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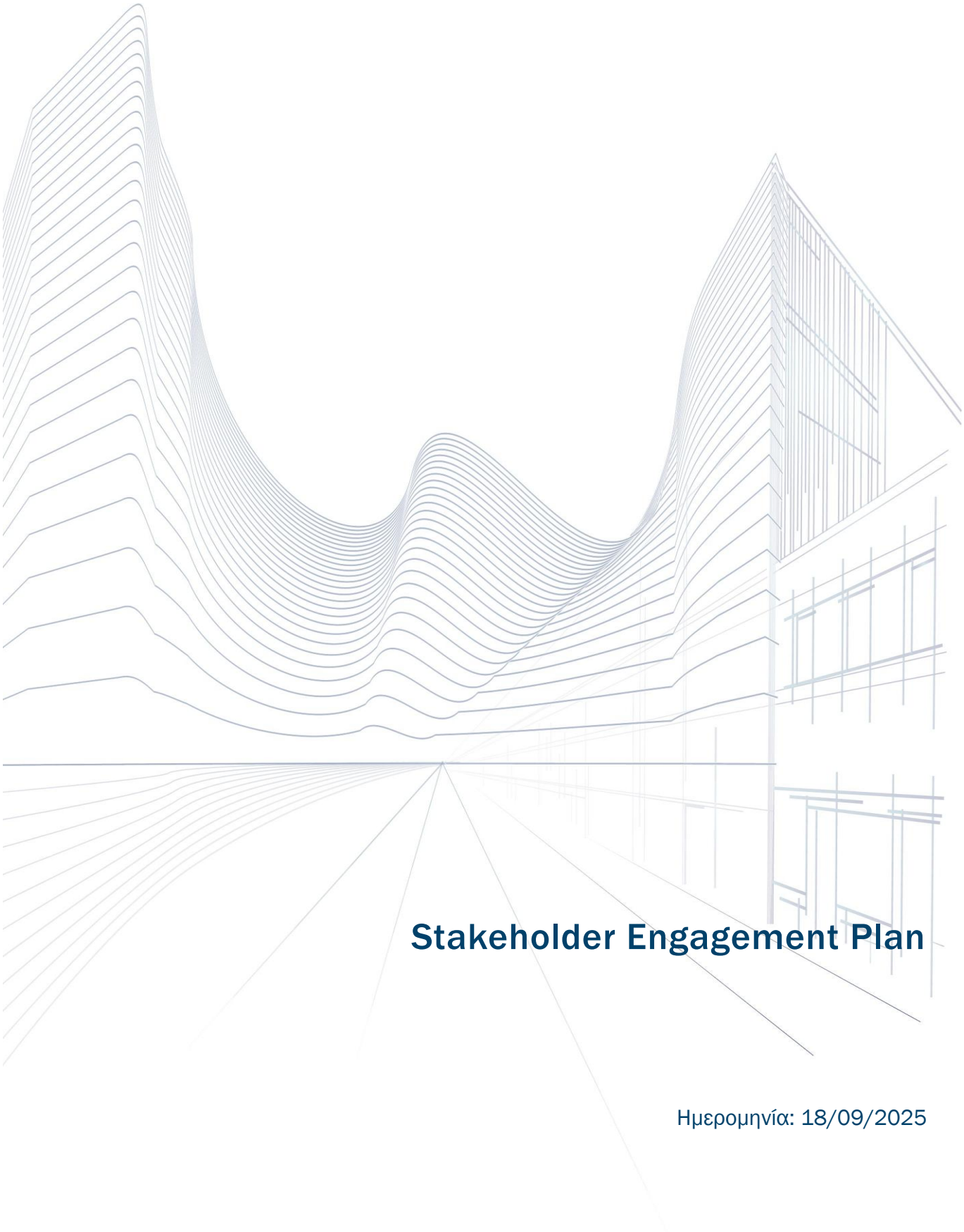

Stakeholder Engagement Plan

Ημερομηνία: 18/09/2025

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Project	CO_2 Storage Unit in Prinos
STUDY STAGE	Stakeholder Engagement Plan
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REVISION	v.01
ENVIRONMENTAL CONSULTANT	LDK CONSULTANTS A.E. – WSP SA
PROJECT ENTITY	ENEARTH GREECE
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1 INTRODUCTION

This document presents the Stakeholder Engagement Plan (SEP) for preconstruction disclosure for EnEarth's project to create a CO_2 storage unit at Prinos. The Project is a full-scale CO_2 storage facility at Prinos (the "Project"). The planned CO_2 storage site is located within the Prinos basin, in the Gulf of Kavala, in the Northern Aegean. The area of interest for CO_2 storage lies within the Prinos Concession, where Energean Oil & Gas S.A. ("Energean"), an affiliated company of EnEarth, has held 100% of the interests and operatorship for oil and gas exploration and production activities since 2007. The planned CO_2 storage location lies within the Prinos structure and the underlying aquifer.

The SEP is developed based on the Stakeholder Engagement Draft Plan (SEDP), which had been prepared within the framework of the Environmental Impact Assessment (EIA, number of application 2016, 03082024) for Phase 1. The development of the SEP is carried out in accordance with Greek and EU legislation and regulations, as well as the requirements of International Financial Institutions, such as Environmental and Social Requirement (ESR) 10 of the Environmental and Social Policy of the European Bank for Reconstruction and Development (EBRD).).

The purpose of the SEP is to guide and support the systematic engagement of stakeholders during the implementation of the Project. The main specific objectives are as follows:

- Contribute to understanding the requirements for stakeholder engagement.
- Identify, map, and prioritize the key stakeholders for the Project, including any vulnerable groups (if applicable).
- Define a technically and culturally appropriate approach to stakeholder engagement, necessary for the effective management of environmental and social risks and impacts.
- Ensure that the SEP is supported with adequate resources, supportive institutional structures, and appropriate procedures.

The SEP now constitutes a stand-alone strategy and implementation document for stakeholder engagement and will be updated, as required, throughout the Project's development and operation.

1.1 BRIEF DESCRIPTION OF THE PROJECT

1.1.1 Project Location

The CO_2 storage site is located within the Prinos basin, in the Gulf of Kavala, in the northern Aegean.

The deposits in this area have been investigated since the 1970s; subsequently, oil production from three fields within the Prinos Concession was developed, as well as natural gas production from the South Kavala Concession, from the 1980s onward. The environmentally licensed onshore installations of the CO_2 storage Project are located within the operating area of Energean's Sigma facilities, at the boundary of the

Municipality of Kavala, approximately 2.4 km east of the settlement of Nea Karvali. The existing environmentally licensed offshore installations of the Prinos complex, as well as the corresponding installations that are proposed under the latest modification are in the Gulf of Kavala, west of Thassos and south of the Kavala shoreline.

The following figure presents a satellite depiction of the project area.

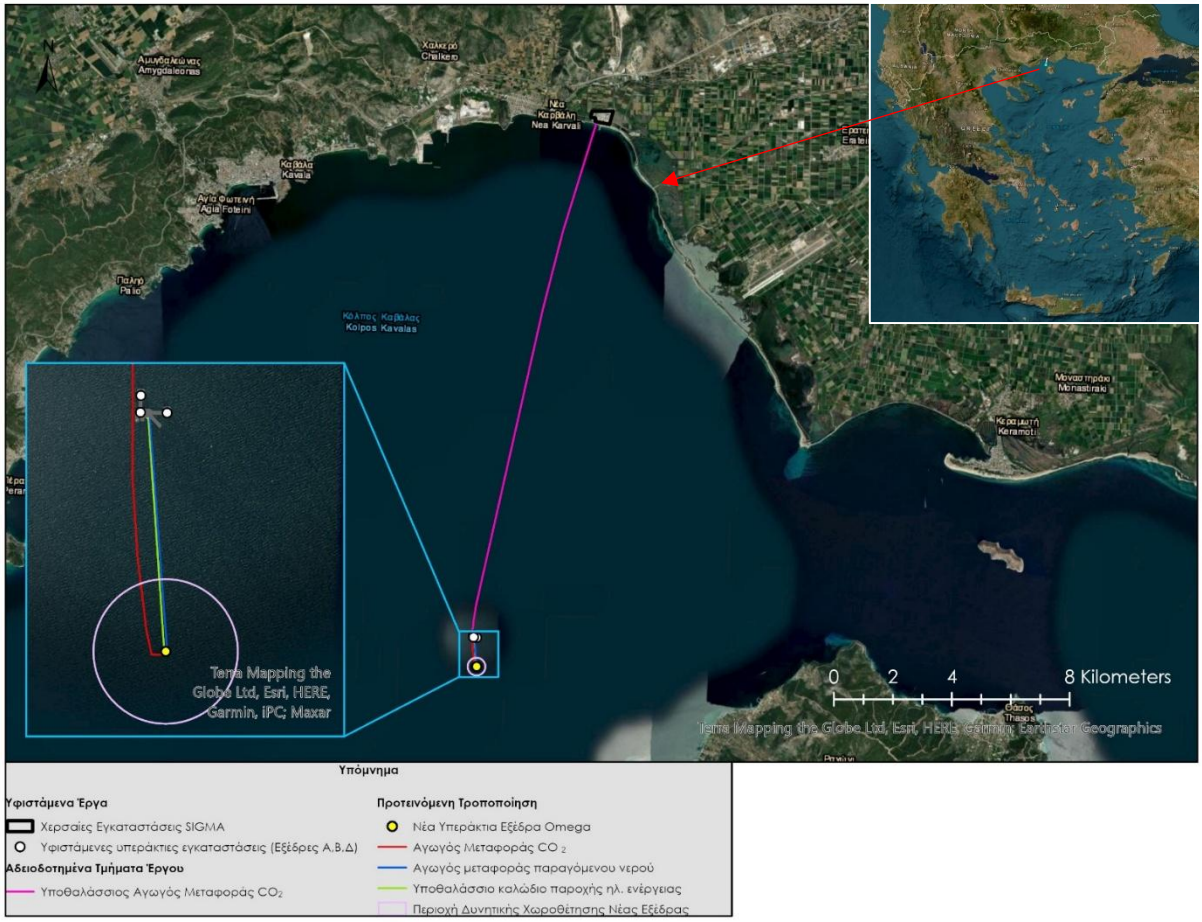


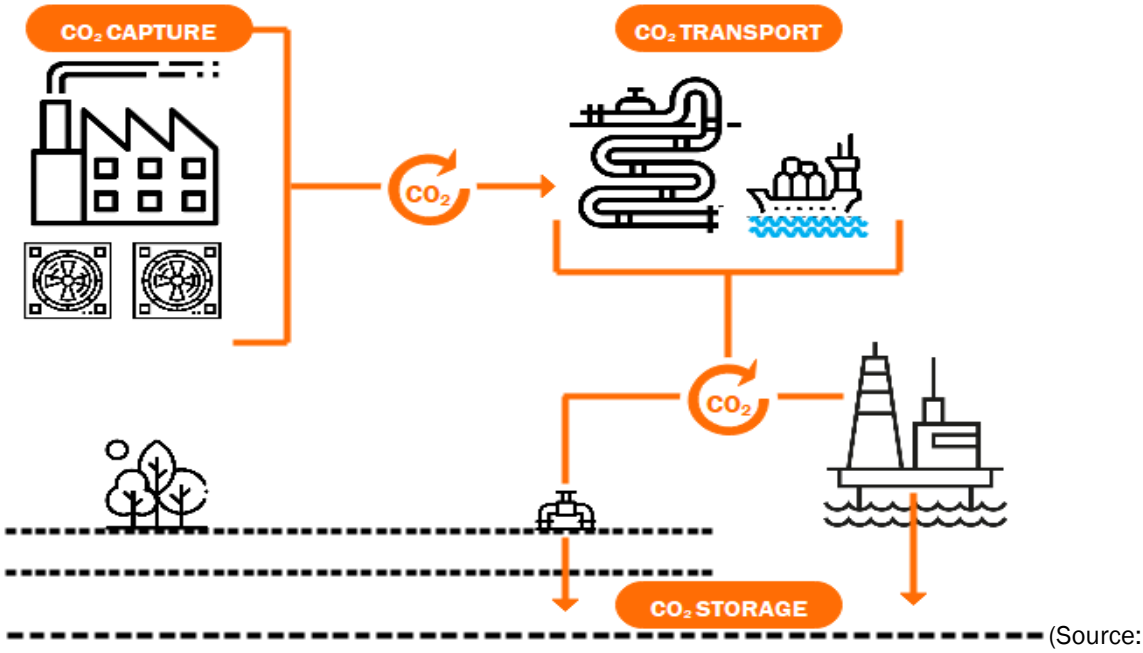
Image 1–1: Satellite view of the Project

1.1.2 General Information about the Project

Carbon Capture and Storage (CCS) refers to the process by which carbon dioxide (CO_2) emitted from large point sources (such as power plants) is captured, treated, and transported to storage sites. CCS is a key technology for the transition to a competitive low-carbon economy by 2050 and for mitigating climate change. The main stages of CO_2 capture, transport, and storage are summarized below:

- CO_2 capture from industrial installations aims to capture CO_2 from the industrial process itself, and several capture technologies exist.

- Transport: Once captured, CO_2 is transported to storage sites—offshore or onshore—via pipelines (primarily by reusing natural gas production pipelines) or, for smaller quantities, by ships, trucks, etc. The logistics chain for moving CO_2 from sources to storage locations requires the development of capital-intensive transport infrastructure (pipelines, liquefaction terminals, etc.).
- CO_2 storage: Injecting CO_2 into geological formations or into depleted natural gas and oil fields enables the safe and permanent underground storage of CO_2, thereby substantially reducing the amounts of CO_2 emissions released to the atmosphere from industrial processes.



(Source: Adapted from https://climate.ec.europa.eu/eu-action/carbon-capture-use-and-storage/overview_en)

Image 1–2: Main stages of CO2 capture and storage

CCS projects are regulated by Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide, as well as by the amendments to Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC, 2008/1/EC of the European Parliament and of the Council, and Regulation (EC) No 1013/2006. The above were transposed into Greek legislation through Joint Ministerial Decision 48416/2037/2011.

In September 2022, Energean obtained a research permit for CO_2 storage in Prinos, Kavala, in accordance with European and Greek legislation. The Project is a critical component of the Mediterranean CCS Strategic Plan, developed by France, Italy, and Greece, aiming to create the first industrial/commercial CO_2 storage hub in the South-Eastern Mediterranean.

The Project is a full-scale CO_2 storage facility at Prinos (the "Project"). The planned CO_2 storage site is located within the Prinos basin, in the Gulf of Kavala, in the Northern Aegean. The area of interest for CO_2 storage lies within the Prinos Concession, where Energean Oil & Gas S.A. ("Energean"), an affiliated company of

EnEarth, has held 100% of the interests and operatorship for oil and gas exploration and production activities since 2007. The planned CO_2 storage location lies within the Prinos structure and the underlying aquifer.

The Project concerns the installation of a carbon dioxide (CO_2) storage unit at Prinos, with a nominal capacity of one million tonnes (1 MTPA) of CO_2 per year. The CO_2 storage formation is located within the Prinos Concession area, in the Prinos basin of the Gulf of Kavala, in the Northern Aegean

The installation will be developed in the following two distinct capacity-based phases (Phase 1 and Phase 2), in order to adapt to demand conditions. The current SEP concerns only Phase 1:

- Phase 1: The Project's initial nominal capacity will be up to one (1) MTPA for 20 years. CO_2 will arrive mainly via third-party pipelines, while some quantities will also be received as CO_2 shipments at the onshore Sigma facilities from trucks through pilot projects.
- Phase 2: A gradual expansion of the Project is envisaged to a final nominal capacity of approximately three (3) MTPA.

The new installations and wells planned for implementing Phase 1 of the CO_2 storage project include:

- Onshore installations: Modification of a designated area within the existing footprint at the Sigma plant for construction of the CO_2 reception manifold and the unloading and compression area.
- Offshore CO_2 transport pipeline: A subsea pipeline connecting the Sigma plant area with the offshore Beta platform, approximately 19 km in length.

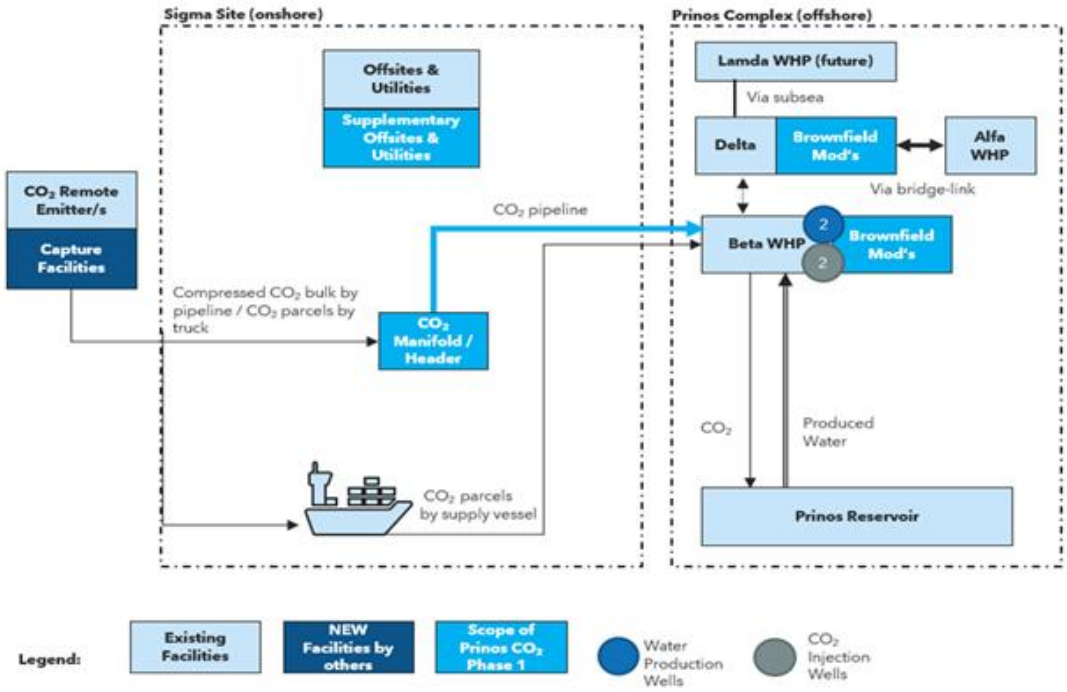
As the project matures, and provided that technical or engineering improvements arise, Phase 1 is expected to be amended with respect to the infrastructure works as follows:

- Offshore platforms: Installation of a new offshore platform (Omega platform) for the reception of CO_2 from a new subsea pipeline and CO_2 cargo in containers, for the injection of CO_2 into the new wells. The new Omega platform is planned to be located within a radius of 300 meters from the indicative siting position, approximately 1 km south of the Prinos platform complex (geographical latitude (N) 40° 47.38327' and geographical longitude (E) 24° 29.92146') (Omega Platform Potential Siting Area). The final siting position of the Omega platform will be determined following the investigation and evaluation of the precise technical and soil characteristics, in order to identify the most technically appropriate solution, which constitutes the first step in the construction methodology of every new platform. The definitive final location of the new Omega platform will be specified in the context of submitting the Final Design Compliance Dossier to the competent environmental authority, as defined in paragraph 7 of Article 11 of Law 4014/2011. A prerequisite for this is that the siting of the Omega platform (for the implementation of the corresponding wells) lies within the 300-meter radius area from the coordinates of the designated central point, which constitutes the indicative siting position of the Omega platform, for which the relevant potential environmental and social impacts have been assessed and evaluated.
- Wells: Two (2) CO_2 injection wells and two (2) water production wells on the new offshore Omega platform.
- Offshore produced-water pipeline: A subsea pipeline connecting the new Omega platform with the existing offshore Delta platform of the Prinos offshore complex, approximately 1 km in length.

- Offshore power supply cable: A subsea power cable from the Delta platform to the new Omega platform.

The CO_2 sources and the main reception processes during operation of the CO_2 storage project will be as follows:

- Supply of a CO_2 stream under suitable conditions for injection via a third-party pipeline to an onshore reception station within the activity area of the Sigma facilities.
- Receipt of CO_2 shipments from trucks carrying ISO containers at the Sigma onshore facilities. The containers will be loaded by crane onto a supply vessel/transport barge, transported, and unloaded offshore. In parallel, direct injection of the CO_2 cargoes into the onshore reception manifold is also envisaged, via a compression station during unloading from the trucks.



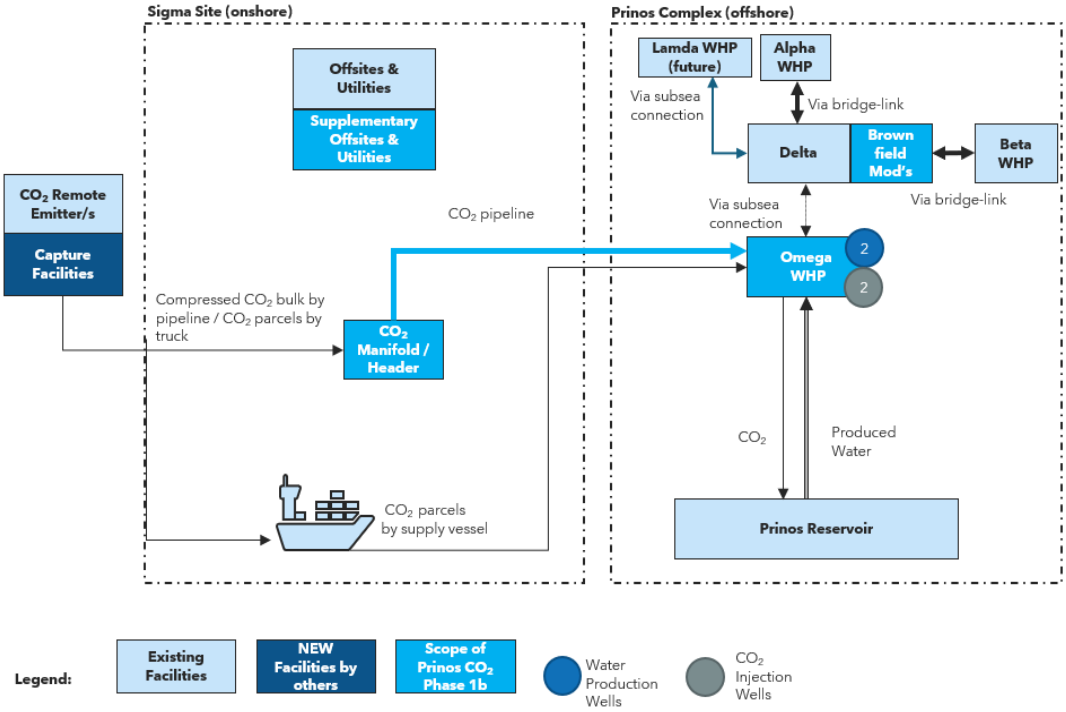


Image 1–3: Schematic representation of Project Phase 1 and the potential proposed amendment

1.1.3 Project Owner

The Project owner (Operator) is EnEarth Greece Single-Member S.A. (Address: 32 Kifisias Ave., 151 25 Marousi, Tel.: 2108174200). EnEarth is a Greek corporation whose primary purpose is to develop CO_2 storage activities in Greece and, in particular, to develop the Project. EnEarth belongs to the Energean group of companies and is an affiliated company of Energean Oil & Gas S.A., which operates the Prinos, North Prinos, and Epsilon fields in the Gulf of Kavala—the country's only hydrocarbon production.

The Energean Group, headquartered in London, is active in hydrocarbon exploration and production and focuses on the sustainable development of the Mediterranean's natural resources, with an emphasis on natural gas. It is committed to net-zero total emissions by 2050 and seeks to implement the 17 UN Sustainable Development Goals through its daily operations and a wide range of corporate social responsibility actions.

The Group is present in seven countries in the Mediterranean and the North Sea and demonstrates an excellent track record in Health, Safety and Environment in hydrocarbon production, development and exploration. It holds over 1 billion barrels of oil equivalent in proved and contingent reserves, of which approximately 80% are gas.

Energean's production comes from Egypt, Italy, Greece, Croatia, and the United Kingdom, exceeding 40,000 barrels of oil equivalent per day in 2021 and targeting 200,000 boe/d on a mid-term basis.

Energean's largest ongoing investment is the development of the Karish, Karish North, and Tanin fields in Israel. The three fields contain about 100 billion cubic meters of natural gas. In parallel, three other major hydrocarbon development programs are underway in Egypt, Italy, and Greece. Total ongoing investments are on the order of USD 3 billion.

In Greece, Energean operates the Prinos, North Prinos, and Epsilon fields in the Gulf of Kavala, which provide the country's only hydrocarbon production. Given market conditions, Energean has implemented a restructuring and modernization program for Prinos, aiming to gradually decouple it from oil-price fluctuations and to further reduce its environmental footprint through CO_2 storage.

In the context of many years of oil operations (exploration and exploitation) within the Prinos Exploitation Area (as defined in the 23.11.1999 Concession Agreement under Law 2779/1999, as amended and in force), Energean has collected geological, geophysical, and drilling data for the Prinos geological basin—and specifically for the Prinos and Epsilon structures—which document that these structures are in principle eligible as CO_2 storage sites.

Accordingly, within the framework of its activities in the area, Energean proceeded with the design and permitting maturation of a CO_2 Storage Unit at Prinos, making use of Article 173 of Law 4964/2022. More specifically, pursuant to Law 4964/2022 (Government Gazette A 150/30.07.2022) entitled "Provisions for the simplification of environmental permitting, establishment of a framework for the development of Offshore Wind Parks, response to the energy crisis, environmental protection and other provisions," and in particular on the basis of Article 173 thereof, entities to which the Hellenic State has granted (under Law 2289/1995 (A' 27)) the right or licence to explore for and exploit hydrocarbons in a specific area, and which possess sufficient data (in particular geological, geophysical and drilling data) to document the preliminary eligibility of a geological formation or formations located in the subsoil of the concession area (onshore or offshore) as a CO_2 storage site, acquire (subject to the conditions of that article) the right to continue and complete the investigation of the specific area in order to determine its suitability for CO_2 storage.

On the basis of the above, on 31.08.2022 Energean applied to HHRM S.A. (EDEYEP) for activation of the right to continue and complete the investigation of the Prinos and Epsilon fields and the underlying aquifer (the "Area") in order to determine their suitability as CO_2 storage sites. This application was accepted by the Decision to Activate the Right to Investigate for CO_2 Storage (as approved by HHRM Decision No. 14577/29.09.2022 (Government Gazette 5247/B/11.10.2022)), which approved the preliminary eligibility of the storage site—located within the boundaries of the Prinos concession and including the Prinos and Epsilon field structures and the underlying aquifer—and also approved the continuation and completion of the investigation of the Area as a storage site for a period of twenty-two (22) months starting 1 October 2022 by Energean.

According to paragraph 5 of Article 173 of Law 4964/2022, after completion of the suitability investigation and before the expiry of the right to complete the investigation, the interested entity submits an application to HHRM in order to ascertain the suitability of the geological formation as a CO_2 storage site and to activate the entity's storage right. The interested entity may be either the holder of the right to continue and complete

the investigation (in this case, Energean) or an affiliated enterprise whose exclusive purpose is the activity of CO_2 storage (in this case, EnEarth).

With the progress and completion of the procedures for investigating the Area as a CO_2 storage site, EnEarth, as an affiliated company of Energean, on 30.06.2024 submitted an application to ascertain the suitability of the geological formation as a CO_2 storage site and to activate the storage right pursuant to paragraph 5 of Article 173 of Law 4964/2022. Energean, as the holder of the right to continue and complete the investigation, co-signed the above application.

Furthermore, according to paragraph 5(e) of Article 173 of Law 4964/2022, facilities used by the operator to support hydrocarbon exploration and exploitation activities may be used within the framework of the CO_2 storage activity. EnEarth and Energean have included in the above application a detailed description of the facilities (existing and new) that are to be used for the purposes of the CO_2 storage activity.

Following the issuance of the decision confirming the suitability of the geological formation as a CO_2 storage site and the activation of EnEarth's storage right pursuant to paragraph 5 of Article 173 of Law 4964/2022, Energean will grant to EnEarth those facilities (onshore and offshore) among the existing installations that are necessary for the development of the CO_2 storage activity. In parallel, Energean will provide EnEarth with technical support through its personnel.

1.2 ENVIRONMENTAL CLASSIFICATION OF THE PROJECT

According to Ministerial Decision DIPA/37674/10-8-2016, as amended by MD 2307/2018 and MD YPEN/DIPA/17185/1069/2022 (Government Gazette 841/B, 24.2.2022) and currently in force, the Project belongs to Category 11 "Transport of energy, fuels and chemical substances," item 6 "Infrastructure for the transport and storage of carbon dioxide streams in geological formations, pursuant to Directive 2009/31/EC," namely:

- Transport pipelines, including associated pressure-boosting stations,
- Storage sites,
- Capture installations for the purpose of storage in geological formations,
- and is classified in Subcategory A1.

Subcategory A1 includes projects that may have significant effects on the environment, and therefore:

- A detailed Environmental Impact Assessment (EIA) is required, in accordance with the specifications set out in Annex 2 of Joint Ministerial Decision (JMD) 170225/2014.
- The competent permitting authority is the Ministry of Environment and Energy (YPEN), specifically the Environmental Permitting Directorate (DIPA), pursuant to Law 4014/2011.
- The permitting procedure for an A1 subcategory project is defined in Article 3 of Law 4014/2011.
- The consultation authorities during the EIA process are defined in JMD 1649/45/2014 ("Specification of the procedures for opinions and the manner of informing the public and participation of the interested public in public consultation during the environmental permitting of Category A projects and activities of Decision 1958/2012 (Government Gazette 21/A) of the

Minister of Environment, Energy and Climate Change, in accordance with Article 19(9) of Law 4014/2011 (Government Gazette 209/A), as well as all other related details").

- The EIA will include Forms T and Y, which define the identity of the activity subject to environmental permitting, as well as information regarding the environmental permitting activity, in accordance with MD 167563 (Government Gazette 964/B/19-04-2013) ("Specification of the procedures and specific criteria for the environmental permitting of projects and activities under Articles 3, 4, 5, 6 and 7 of Law 4014/2011, as defined in Article 2(13), the special forms of the above procedures, as well as any other related matter")

The Project's environmental permitting process is governed by Law 4014/2011, as amended by Law 4685/2020 ("Modernization of environmental legislation, transposition into Greek law of Directives 2018/844 and 2019/692 of the European Parliament and of the Council, and other provisions," Government Gazette 92/A/07.05.2020). The content and level of detail of the Environmental Impact Assessment are defined in Joint Ministerial Decision 170225/2014.

1.3 PURPOSE AND OBJECTIVES OF STAKEHOLDER PARTICIPATION

Stakeholder engagement plays a key role in building strong, constructive, and flexible relationships with stakeholders. In this context, the primary objective of stakeholder engagement is to make the Project and its impacts known and to gather stakeholder views in order to improve the Project's decision-making and build understanding through the active participation of individuals, groups, and organizations in the Project.

The aim of the SEP is to identify and record all potentially affected groups and individuals and to set out the strategy for informing, consulting, engaging, and collaborating with the identified stakeholders. The SEP seeks to contribute to:

- Facilitating access to information and achieving appropriate disclosure of information.
- Ensuring the information about the Project is accurate.
- Identifying issues early in the Project cycle that may pose a risk to the Project or its stakeholders.
- Establishing a system for long-term meaningful consultation and feedback exchange between the Project and its stakeholders.
- The design of a mechanism for addressing and resolving complaints or concerns relevant to the Project.

The figure below illustrates the processes involved in the development and implementation of the SEP:

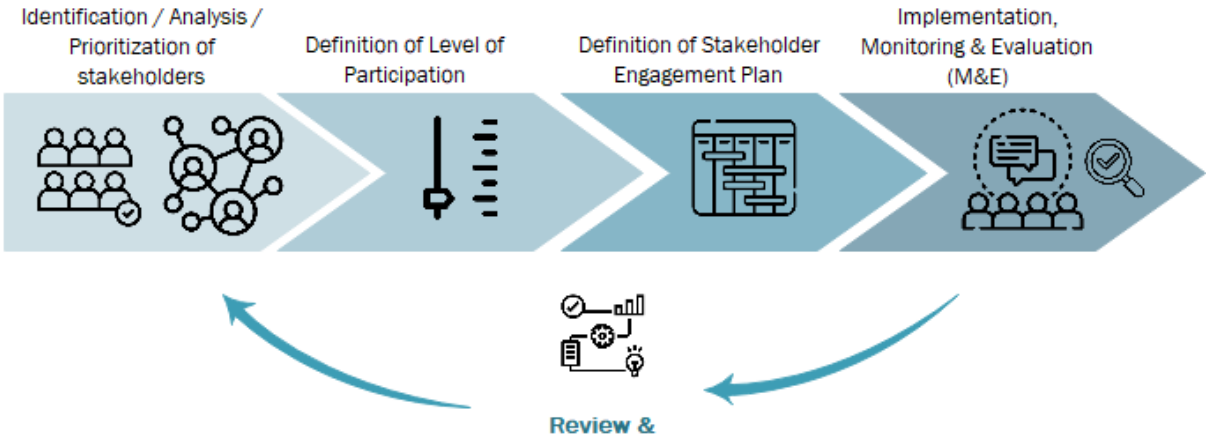


Image 1–4: SEP development and implementation process

The SEP constitutes a comprehensive framework that sets out the core principles of engagement; the identification, description, and prioritization of stakeholders; a set of tools and communication channels to achieve the planned level of engagement; as well as an engagement activity plan. The SEP has been developed in accordance with applicable legislation and EBRD Environmental and Social Requirement 10 and is an independent strategy and implementation document, which will remain in force in subsequent phases of the Project and will be reviewed regularly.

The SEP includes:

- The principles and objectives for stakeholder engagement.
- The key regulatory requirements for stakeholder engagement.
- Existing engagement and the available engagement mechanisms already in place that can be leveraged.
- An updated stakeholder register and an in-depth analysis. The analysis allows determination of how and to what extent stakeholders (1) are or are likely to be affected (directly or indirectly) by the Project, or (2) may have an interest in and/or influence on the Project; it also enables an understanding of their characteristics and needs, as well as the structure of relationships among them.
- A prioritization of stakeholders in order to define the most appropriate engagement approach, the necessary resources, and effective targeting.
- A Stakeholder Engagement Program for both the construction and operation phases—which describes, at a minimum, the form of engagement, the schedule and frequency of activities, the information to be disclosed/the content of engagement, the resources to be allocated, the method of public disclosure, and the process for incorporating comments/feedback.
- The description of a functional Grievance Mechanism

Monitoring and reporting measures to assess the effectiveness of stakeholder engagement and to guide any adjustments and revisions of the SEP.

Relevant institutional arrangements, indicative resources, and responsibilities for SEP implementation, as well as oversight arrangements.

It is important to note that the SEP is a living document and will be reviewed regularly throughout the life of the Project. Reviews will consider project progress and the results of engagement activities already conducted, so that the necessary updates can be made.

2 REGULATORY FRAMEWORK FOR STAKEHOLDER PARTICIPATION

2.1 NATIONAL AND EU REGULATORY FRAMEWORK

Stakeholder engagement for the Project is carried out in accordance with the requirements of the applicable Greek and EU legislation, which is summarized below:

Table 1: Relevant national and EU legislation

Serial No. of Legislative Act & Government Gazette (FEK)	Regulation-Legislative Act
Regulation (EC) No 1367/2006	Regulation **(EC) No 1367/2006** of the European Parliament and of the Council of 6 September 2006 on the application to Community institutions and bodies of the provisions of the **Aarhus Convention** on access to information, public participation in decision-making and access to justice in environmental matters.
Directive 2003/35/EC	• Directive **2003/35/EC** of the European Parliament and of the Council of 26 May 2003 providing for **public participation** in respect of the drawing up of certain plans and programmes relating to the environment and **amending**, as regards public participation and access to justice, **Council Directives 85/337/EEC and 96/61/EC**.
Directive 2014/52/EU	Directive **2014/52/EU** of the European Parliament and of the Council of 16 April 2014 (**EIA Directive**) **amending Directive 2011/92/EU** on the assessment of the effects of certain public and private projects on the environment.
Law 3422/2005 (Government Gazette 303/A, 13.12.2005)	Law **3422/2005** ratifying the **Aarhus Convention** on access to information, public participation in decision-making and access to justice in environmental matters.
Law 4014/2011 (Government Gazette 209/A, 21.9.2011)	• Law 4014/2011, as amended and in force, on the environmental permitting of projects and activities, the regulation of unauthorized constructions in conjunction with creating an environmental balance, and other provisions under the competence of the Ministry of Environment. •
Ministerial Decision oik. 48963/2012 (Government Gazette 2703/B, 5.10.2012)	• Ministerial Decision (MD) oik. 48963/2012 – Content specifications of Environmental Terms Approval (A.E.P.O.) decisions for Category A projects and activities under Decision No. 1598/13.1.2012 of the Minister of Environment, Energy and Climate Change (Government Gazette 21/B), as in force pursuant to Article 2 §7 of Law 4014/11 (209/A).

Serial No. of Legislative Act & Government Gazette (FEK)	Regulation-Legislative Act
Ministerial Decision oik. 167563/EYPE/2013 (Government Gazette 964/B, 19.4.2013)	• MD oik. 167563/EYPE/2013, as amended and in force — Specification of procedures and specific criteria for the environmental permitting of projects and activities under Articles 3, 4, 5, 6 and 7 of Law 4014/2011, pursuant to Article 2(13) thereof, the special forms for the above procedures, and any other matter related to these procedures.
Ministerial Decision oik. 1649/45/2014 (Government Gazette 45/B, 14.1.2014)	• MD oik. 1649/45/2014 — Specification of the procedures for opinions, and the manner of informing the public and participation of the interested public in public consultation during environmental permitting of Category A projects and activities under Decision No. 1958/2012 (Government Gazette 21/A) of the Minister of Environment, Energy and Climate Change, pursuant to Article 19(9) of Law 4014/2011 (Government Gazette 209/A), as well as all other related details.
Ministerial Decision oik. 170225/2014 (Government Gazette 135/B, 27.1.2014)	• MD oik. 170225/2014, as amended and in force — Specification of the contents of environmental permitting dossiers for Category A projects and activities under Decision No. 1958/2012 (Government Gazette 21/B) of the Minister of Environment, Energy and Climate Change, as in force, pursuant to Article 11 of Law 4014/2011 (209/A), and any other related details.
Ministerial Decision 1915/2018 (Government Gazette 304/B, 2.2.2018)	• MD oik. 1915/2018 — Amending MD 48963/2012 (B 2703), MD 167563/2013 (B 964) and MD 170225/2014 (B 135), issued under Law 4014/2011 (A 209), in compliance with Directive 2014/52/EU "amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment" of the European Parliament and of the Council of 16 April 2014.
Law 4685/2020 (Government Gazette 92/A, 07.05.2020)	• Law 4685/2020, as amended and in force — on the modernization of environmental legislation, the transposition into Greek law of Directives 2018/844 and 2019/692 of the European Parliament and of the Council, and other provisions.

Below are the key steps in the process for issuing an Environmental Terms Approval (AEPO) decision, including the requirement for Public Consultation, in accordance with Law 4014/2011, as amended and in force, for A1 subcategory projects and activities, without submission of a Preliminary Determination of Environmental Requirements (PPPA) file.

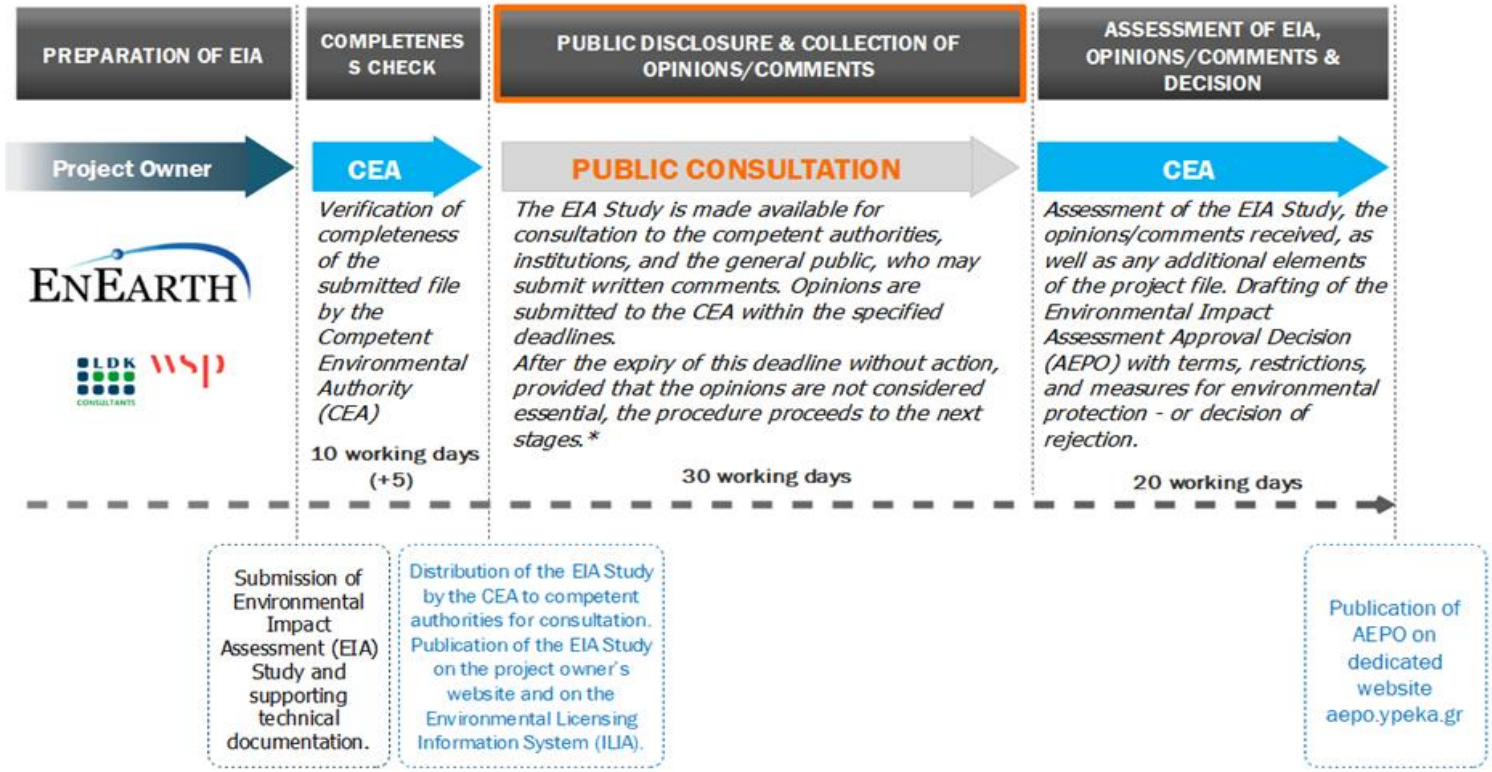


Image 2–1: Procedure for the Issuance of Environmental Terms Approval (A1 subcategory projects, without submission of a Pre-Approval File)

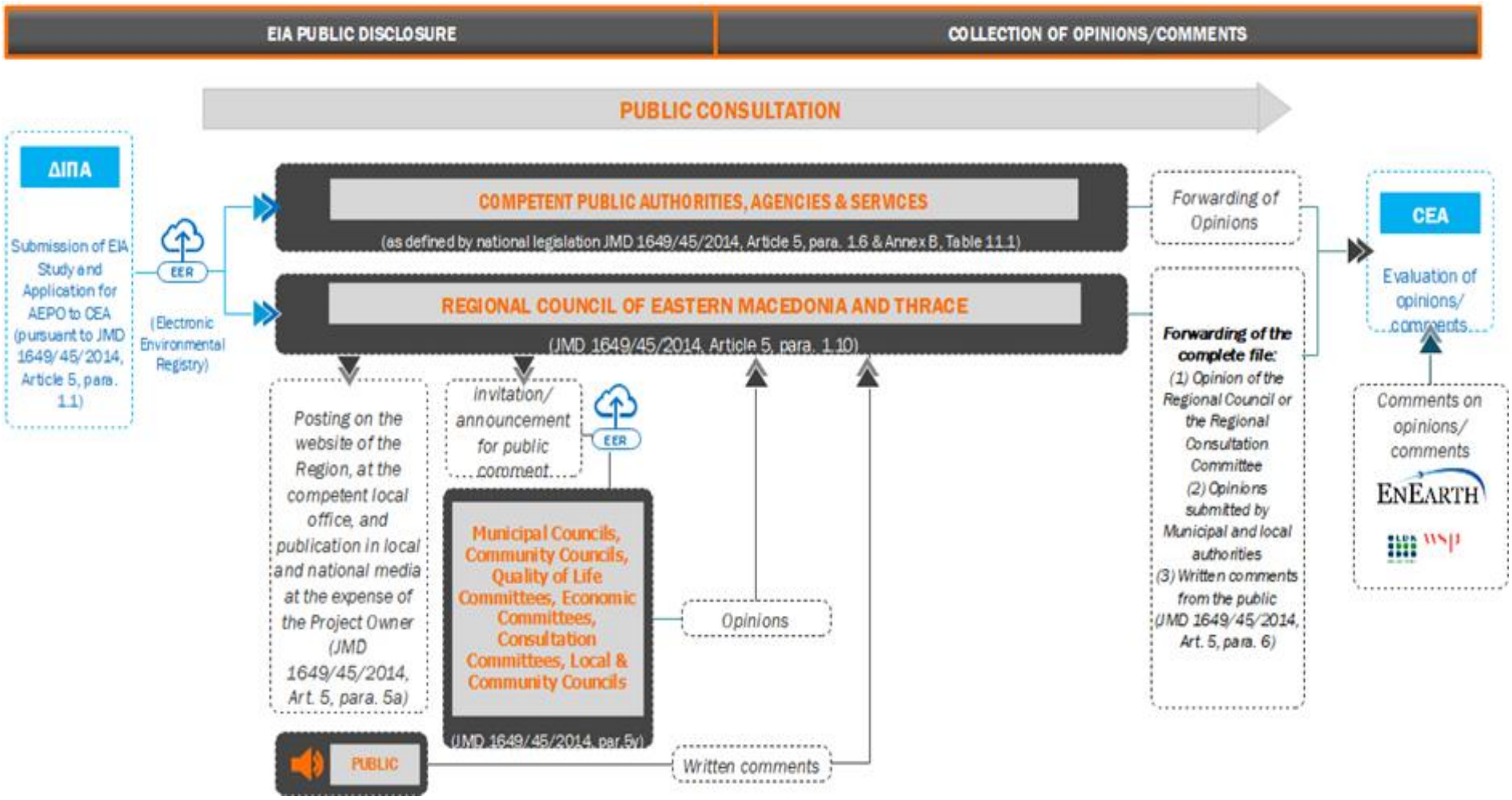


Image 2–2: Procedure of Disclosure and Public Consultation (for projects of subcategory A1, without submission of a Preliminary Determination of Environmental Requirements – PDER)".

2.2 REQUIREMENTS OF INTERNATIONAL FINANCIAL INSTITUTIONS

2.2.1 European Bank for Reconstruction and Development (EBRD)

The SEP for the Prinos CO_2 storage project has been developed in full alignment with the EBRD Environmental and Social Policy (2024), particularly ESR 1: Assessment and management of environmental and social risks and impacts and ESR10: Information Disclosure and Stakeholder Engagement. In accordance with EBRD's commitment to promoting "environmentally sound and sustainable development." and its categorisation of projects based on the nature, scale, sensitivity, and significance of their potential impacts, this project has been classified as a Category A project, reflecting the potential for significant environmental and social impacts that require both comprehensive assessment (ESR1) and robust, participatory stakeholder engagement (ESR10).

The SEP has therefore been designed to fulfil the enhanced requirements applicable to Category A projects, integrating stakeholder engagement as a core component of the overall environmental and social assessment and management process. Consistent with ESR1 and ESR10, the SEP establishes a structured, participatory approach across all project stages. This includes: (i) systematic stakeholder identification and analysis, including vulnerable and potentially affected groups; (ii) timely, accessible, and culturally appropriate disclosure of relevant project information; (iii) meaningful, inclusive, and ongoing consultation to inform project decision-making; and (iv) a transparent and accessible grievance mechanism enabling stakeholders to raise concerns and receive timely responses throughout the project lifecycle. By integrating these elements, the SEP ensures that stakeholder engagement is not only compliant with EBRD's policy framework but also an integral part of impact assessment, risk management, and project design..

The key elements of ESR1 and ESR10 are summarized below:

Table 2: Key elements of Performance Requirements 1 & 10

Environmental and Social Requirement 1	Environmental and Social Requirement 10
Identification **and assessment** of the Project's **adverse and beneficial environmental and social impacts** and related issues.	Identification **of stakeholders** who are affected or may be affected by the Project, including **disadvantaged or vulnerable groups** that may be affected differently or disproportionately by the Project.
Adoption **of measures** to **avoid**—or, where avoidance is not possible, to **minimize, mitigate, or offset**—adverse impacts on workers, affected communities, and the environment.	Ensuring **timely information disclosure** and **meaningful consultation** throughout the Project lifecycle so that stakeholders can participate meaningfully in matters that concern them.
Provision **of relevant information, guidance, and training** to workers and affected communities on **health and safety risks** and the **preventive/protective measures**.	**Establishment and operation of a Grievance Mechanism** that facilitates the submission and effective resolution of concerns or complaints related to the Project.
Identification **of, and where feasible, leveraging opportunities** to improve environmental and social performance.	Ongoing **provision of appropriate information** to stakeholders on the Project's environmental and social performance, including risks, impacts, and issues arising from the Grievance Mechanism.

Environmental and Social Requirement 1	Environmental and Social Requirement 10
Promotion **of improved environmental and social performance** through a **dynamic process of monitoring and evaluating** performance.	Monitoring **changes** in the Project and **updating the SEP accordingly**, so that it remains current and effective

2.2.2 Other Financial Institutions

Beyond the EBRD, other international financial institutions now recognize stakeholder engagement as an essential element of sound business practice and corporate responsibility, as well as a means of improving project quality. In particular, meaningful public participation is recognized as a key factor for the successful management of risks and impacts on communities affected by projects, and for achieving enhanced benefits for society at large. Below is a brief summary of the approaches adopted by major organizations, which constitute good practices that the Project's SEP incorporates to varying degrees.

The World Bank Environmental and Social Framework (ESF) represents the World Bank's commitment to sustainable development, through a dedicated Policy and a set of Environmental and Social Standards (ESS). Projects supported by the Bank are required to meet these standards, including ESS10: Stakeholder Engagement and Information Disclosure.

In summary, ESR10 requires:

- Establishing a systematic approach to stakeholder engagement that enables the identification of stakeholders and the creation and maintenance of a constructive relationship with them, especially with those affected by the project.
- Assessing the level of interest and support of stakeholders for the project and providing opportunities for their views to be taken into account regarding project design and environmental and social performance.
- Supporting effective and inclusive participation of project-affected parties throughout the project lifecycle.
- Ensuring the dissemination of information on the project's environmental and social risks and impacts in a timely, clear, understandable, and accessible manner.
- Developing an accessible and inclusive grievance mechanism that allows project-affected parties to raise issues and complaints and enables financiers to address and manage those issues and complaints.

The UNDP Social and Environmental Standards (SES) ensure, among other things, meaningful, effective, and informed participation of stakeholders in the design and implementation of programmes and projects. Stakeholder engagement is required to be a continuous process that may include, to varying degrees, the following elements: stakeholder analysis; information disclosure and dissemination; consultation and meaningful participation; dispute resolution and grievance processes; and ongoing reporting to affected communities and other stakeholders. The stakeholder engagement process must duly consider the gender dimension and be conducted in a culturally sensitive, non-discriminatory, and inclusive manner, ensuring that potentially affected vulnerable and marginalized groups are identified and provided opportunities to participate

2.3 STANDARDS AND POLICIES

EnEarth belongs to the Energean group of companies, which seeks to implement the 17 United Nations (UN) Sustainable Development Goals through its day-to-day operations and a wide range of corporate social responsibility actions. Engagement with local communities is an integral part of Energean's corporate and social responsibility policy, and cooperation with the communities in which it operates is at the forefront of Energean's corporate values.

In this context, it has a "Health, Safety, Environmental & Social Responsibility Policy," which, among other things, aims to ensure cooperation with local communities and other stakeholders.

stakeholders in a responsible and transparent manner, and a "Code of Conduct," which is guided by Energean's core values, including interaction with local communities to meet their expectations and needs.

3 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

In accordance with legislative requirements in Greece and ESR10 of the EBRD Environmental and Social Policy 2024, stakeholder engagement activities have been conducted as part of the planning and development process of the Prinos CO2 storage project. This section summarizes the previous stakeholder engagement efforts undertaken to ensure meaningful consultation, information disclosure, and participation by stakeholders in line with both national and EBRD standards.

Basic information about the project is available on the EnEarth website (https://www.enearth.earth/el/what-we-do) and the Energean website (https://www.energean.com/el/home/projects/ h-αποθηκευση-co2-στον-πρινο/).

Information has also been disseminated through press releases by Energean and EnEarth concerning the CO_2 storage project in Prinos, available on their websites:

- EnEarth's press releases page (https://www.enearth.earth/press-release) and Energean's news page (https://www.energean.com/el/home/mme/τα-νεα-μασ/) include several updates, such as:
  - Financing of approximately EUR 120 million from the ERDF for the development of a liquefied CO_2 terminal in Prinos.
  - EnEarth's official application for a CO_2 storage permit in Prinos, Kavala.
  - Partnership announcements, such as a significant direct air capture and CO_2 storage agreement.

A list of press releases and media reposts is presented in Annex 2.

Multiple news items, articles, and official announcements have also been published regarding the financing and progress of the Energean and EnEarth CO_2 storage project in Prinos, such as:

- Articles on the first wells planned for 2026.
- Approval of state aid.
- Coverage of Memoranda of Understanding (MoUs) and stakeholder participation.

These press releases and articles published by local, national and international media, including the specialized press (construction, real estate, education, etc.)—provide information about the project and its development. A non-exhaustive list of publications is presented in the table below.

Table 3: Online articles about the Project

Date	Title / Description	Μέσο	Link
2025-09-16	Awaiting the issuance of the Environmental Terms Approval (ΑΕΠΟ) for the Prinos CO_2 storage project	Article	https://ypodomes.com/en-anamoni-tis-aepo-gia-to-project-tis-monadas-apothikeysis-co2-ston-prino/
2025-09-15	The Energy Observer in Prinos for CO2 Storage	Article	https://www.kavalanews.gr/53870-energy-observer-prino-apothikeysi-co2.html
2025-09-14	The Energy Observer in Prinos for CO2 Storage	Article	https://www.newmoney.gr/roh/palmos-oikonomias/epixeiriseis/to-prasino-energy-observer-ston-prasino-prino-gia-tin-apothikefsi-co2/
2025-08-04	Funding Begins for Greece's First Carbon Capture and Storage	Article	https://www.dnews.gr/eidhseis/news-in-english/539929/funding-begins-for-greece-s-first-carbon-capture-and-storage-project
2025-05-22	Energean is bringing a drilling rig to Prinos in 2026 for CO2 storage	Article	https://www.ot.gr/2025/05/23/epixeiriseis/energean-fernei-geotrypano-to-2026-ston-prino-gia-to-project-tis-apothikeysis-co2/
2025-05-22	Prinos CO2 storage site by Energean set for first drilling	Article	https://www.gasworld.com/story/prinos-co2-storage-site-by-energean-set-for-first-drilling-in-2026/2156420.article/
2025-05-17	Energean and EnEarth: The CO2 storage project in Prinos is in progress	Article	https://rawmathub.gr/enimerosi-gia-tin-aksiaki-alysida-proton-ylon-kai-ylikon/epixeirimatika-nea-gia-protes-yles-kai-ylika/energean-kai-enearth-se-ekseliksi-to-ergo-apothikefsis-co2-ston-prino
2025-03-19	CO2 Storage: Energean's €1 billion mega project in Prinos is maturing.	Article	https://www.energymag.gr/energeia/106342_apothikeysi-co2-orimazei-mega-project-1-dis-tis-energean-ston-prino-oi-ekkremotites
2024-10-28	EU approves Greek state aid of EUR 150 million for Prinos CCS	Article	https://balkangreenenergynews.com/eu-approves-greek-state-aid-of-eur-150-million-for-prinos-ccs-facility/
2024-10-27	Approved €150 million support for CO2 storage in Prinos.	Article	https://www.energymag.gr/energeia/101588_komision-enekrine-enishysi-eu150-ekat-gia-tin-apothikeysi-co2-ston-prino
2024-07-01	EnEarth applies for CO2 storage license at Prinos, Greece	Article	https://www.carboncapturejournal.com/ViewNews.aspx?NewsID=6254

As part of the Environmental Impact Assessment (EIA) for Phase 1 of the project, a Public Consultation was carried out in accordance with the requirements of the applicable environmental legislation. Following the

completion of the process, a Consultation Report was prepared, in which all written observations and comments were recorded and reviewed. The observations were presented in consolidated tables, accompanied by the corresponding responses.

In addition, EnEarth has developed a wide range of informational material for the purpose of stakeholder engagement and awareness, which includes:

- Presentations used in briefings and workshops.
- A Q&A Playbook compiling the issues raised and the responses provided during the Public Consultation on the Environmental Impact Study, as well as additional requests for clarifications.
- Videos and audiovisual material published online or presented at events.

These materials are maintained and organized in a dedicated company archive/library, so that they are available for reference and documentation, and reflect the companies' commitment to timely and transparent information. All relevant records of communication and disclosure are maintained and organized by the staff responsible for the implementation of the SEP; examples are provided in Annex 2.

As part of the participation and dialogue activities, meetings have been held and documented in a dedicated Stakeholder Register Log (Annex 1). The meetings include:

- Informational meetings and consultations with institutional and local stakeholders.
- Thematic conferences on technical issues.
- Sessions/participatory forums with involved stakeholders and social partners.

These events are conducted either on a one-to-one basis or in multilateral formats, depending on the stakeholder's profile or the subject of discussion.

An overview of stakeholder engagement activities implemented to date by stakeholder group is presented in the table below:

Table 4: Stakeholder Engagement Completed to Date (with Meeting Dates)

Stakeholder Group	Stakeholder Name	Engagement Activities Completed	Methods Used	Indicative Timing	Meeting Dates
Central Government Authorities	Greek government, Ministry of Economy and Finance, Ministry of Energy, General Secretariat for Energy and Mineral Resources, General Secretariat for Natural Environment and Water	Informative meetings, tailored information materials, ESIA phase 1	Meetings, presentations, Reports	Pre-construction Phase and ongoing	31/07/2025, 11/07/2025
National Institutions /Political Parties	Parliament (Kavala and Drama representatives, Head of the environment for the opposition)	Informative meetings, tailored info materials, ESIA phase 1	Meetings, presentations, Reports	Pre-construction Phase and ongoing	12/07/2024, 07/07/2025, 04/06/2025, 19/03/2025, 20/03/2025 09/07/2024, 29/08/2024

Stakeholder Group	Stakeholder Name	Engagement Activities Completed	Methods Used	Indicative Timing	Meeting Dates
Regional Authorities	Regional Council of Kavala, Region for Environment, Environmental Committee of the Region, Region for Development, East Macedonia & Thrace Region, East Macedonia & Thrace Region (Tourism), East Macedonia & Thrace Region for (Sports and Culture), Kavala Service of Civil Protection, East Macedonia & Thrace (Environmental Directorate), Decentralised Administration (Kavala)	Informative meetings, tailored information materials, ESIA phase 1	Meetings, conferences, Reports	Pre-construction Phase and ongoing	11/07/2025, 10/07/2025, 07/07/2025, 11/06/2025, 01/03/2025, 01/02/2025, 15/10/2024, 12/10/2024, 04/10/2025, 13/09/2024, 29/08/2024, 29/07/2024,
Local Authorities	Municipality of Paggaio, Nea Karvali Community, Municipality of Thassos Municipality of Kavala, Municipality of Nestos, Municipality of Nestos Municipality of Kavala (Development Company), Kavala Central Port Authority, Kavala Port Authority, Kavala fire brigade, Kavala Port Fire brigade	Informative meetings, tailored information materials, ESIA phase 1	Meetings, conferences, Reports	Pre-construction Phase and ongoing	7/7/2025, 17/05/2025, 05/04/2025, 30/03/2025, 01/03/2025, 30/01/2025, 17/09/2024, 14/9/2024, 10/09/2024, 15/10/2024, 13/07/2024, 12/07/2024, 10/07/2024, 09/07/2024
Local Communities	Kavala municipality community, Thassos local community, Kavala Trade Union, Kavala fisheries Association	Informative meetings, press releases, online webpages, ESIA phase 1	Meetings, conferences, media, web, reports	Pre-construction Phase and ongoing	07/07/2025, 30/01/2025, 15/10/2024
Private Sector Organizations	Contractors, subcontractors	Online webpages, ESIA phase 1	media, web, reports	Pre-construction Phase and ongoing	
Employees/Staff	Project Workforce	Informative sessions, tailored materials	Meetings, intranet postings, grievance logs	Continuous	26/04/2025

Stakeholder Group	Stakeholder Name	Engagement Activities Completed	Methods Used	Indicative Timing	Meeting Dates
Civil Society Organizations (CSOs)	Kavala trade association, Thasos Hoteliers Association, Region of Kavala Hoteliers Association, Technical Chamber of East Macedonia, Kavala commercial Chamber, Financial Chamber of Kavala region	Informative meetings, conferences, tailored information materials, ESIA phase 1	Meetings, conferences, media, web, Reports	Pre-construction Phase and ongoing	7/7/2025, 6/4/2025, 30/01/2025, 15/10/2024,
Academia	Chemistry department of Democritus University, MSc Oil and Gas of Democritus University, Society Petroleum Engineers, Institute of oil, gas and renewables	Informative meetings, conferences, tailored information materials, ESIA phase 1	Meetings, conferences, media, web, Reports	Pre-construction Phase and ongoing	7/7/2025, 25/6/2025, 12/5/2025, 15/10/2024,
Media	Local and National Media Outlets	Press releases, public information dissemination	Press events, media interviews, online articles	Continuous	See table above
General Public	Via Media / Civil Society Organizations (CSOs)				

3.1 CONCERNS RAISED BY STAKEHOLDERS

Main concerns raised by local stakeholders are summarize below:

- Safety and technical risks

Safety emerged as one of the foremost concerns. Stakeholders questioned the possibility of leaks in cases of catastrophic incidents, citing examples such as the Lake Nyos disaster in Cameroon and the pipeline rupture in Mississippi, USA. Experts from the State and EnEarth highlighted the significant geological and technical differences between those events and the Prinos site, and explained why a leak is very unlikely and, even if it happens, it will have minor and rapidly reversable consequences, as stated in the ESIA.

Additional questions focused on the risk of CO_2 blowouts, the integrity of existing wells, and whether all outdated infrastructure would be replaced. Concerns were also raised regarding the operator's technical expertise, with the Regional Councilor of Kavala questioning whether the company is adequately equipped to manage such a complex CCS (carbon capture and storage) project. The Opposition Regional Governor of Kavala sought detailed information on the exact composition of the CO_2 stream. Further technical concerns included compliance with certification standards (e.g., ISO, Well Examiner), the use of CO_2-resistant materials, and the management and upgrading of aging facilities.

State and company experts consistently emphasized the project's safety and regulatory compliance and explained why blowouts are not possible. They highlighted the use of new CO_2-resistant wells and pipelines,

adherence to internationally recognized standards (e.g., ISO 27913, OEUK guidance). They also stated that oil & gas operators are the most appropriate entities to operate CO2 Storages, due to the deep knowledge of the reservoirs. They also reply that the composition of CO2 to be injected will be close to 99% of CO2.

- Induced Seismicity

The potential for induced seismic events was another recurring issue. Stakeholders expressed concern that even small tremors could affect public confidence, local infrastructure, or marine ecosystems. These concerns underscored the need for continuous geophysical monitoring and the flexibility to adjust injection rates in real time. They have been informed, though, that, according to relevant study of the Institute oof Geodynamics of the National Observatory of Athens, the area the project has the lowest seismicity factor in Greece and that the Prinos Basin is a tectonically stable area. State and company experts have also reassured that microseismicity will be monitored as per the EIA provisions.

- Environmental Impact

Concerns were raised about the handling of brine and produced water, including whether marine discharges could disrupt local ecosystems. Additional concerns included noise pollution, water turbidity, and habitat disturbance—particularly with respect to fish populations and the broader marine environment of the Kavala Gulf.

Stakeholders also highlighted the issue of fishing zone restrictions, noting that exclusion areas already exist around offshore platforms. They raised potential risks to underground aquifers, especially in sensitive areas such as the Nestos Delta and the Kavala Basin. Possible impacts on archaeological sites—both underwater and onshore—were also mentioned. All of the concerns raised are covered extensively in the ESIA and have been responded accordingly

- Maritime and Coastal Activity

Concerns were also raised regarding maritime operations. The prospect of daily CO_2 carrier vessels docking in Kavala raised fears about interference with ferry routes, local fishing activities, increased maritime traffic, and associated environmental or safety risks. The project developer assured that CO_2 deliveries would occur via already-established shipping routes and would offload at onshore facilities rather than platforms.

- Socioeconomic and Reputational Risks

The socioeconomic implications of the project were significant, particularly for a region heavily reliant on tourism. Stakeholders from the Thassos Island warned that even the perception of industrial risk could damage the area's reputation as a safe and attractive destination. The example of producing oil with high sulfur density with almost 45 years in perfect harmony with local activities, tourism and with absolutely no environmental image, along with the fact that depleted hydrocarbon fields such as Prinos the safest and most technologically advanced solutions available for large-scale CO_2 storage have been brough up by the company and state experts.

- Existing Industrial Emissions

Finally, the issue of current industrial pollution was raised. Residents pointed to existing air quality concerns, particularly emissions from Kavala Solutions, the fertilizer plant in Nea Karvali, and asked whether capturing CO_2 from such facilities could be integrated into the project to improve local environmental conditions. It

should be noted that EnEarth has already signed an MoU with Kavala Solutions, aiming at storing the latter's CO2 emissions in Prinos.

Stakeholder concerns raised to date have been systematically addressed through ongoing engagement processes in line with EBRD ESR 10, which emphasizes meaningful, transparent, and inclusive consultation. All issues, including safety and technical risks, seismicity, maritime activity, environmental impacts, socioeconomic and reputational risks, have been considered in the ESIA and responded to in detail through the consultations process. EnEarth and relevant state authorities have provided evidence-based explanations, prepared information materials, shared study findings, and clarified mitigation and monitoring measures. Going forward, stakeholder engagement will continue throughout the project lifecycle, including regular updates, disclosure of monitoring results, and opportunities for stakeholders to provide feedback, ensuring that evolving concerns are identified early and addressed effectively.

4 IDENTIFICATION AND ANALYSIS OF STAKEHOLDERS

4.1 APPROACH FOR THE IDENTIFICATION AND PRIORITIZATION OF STAKEHOLDERS

The objective of the stakeholder identification and prioritization process is to create a list of organizations and individuals who may be directly or indirectly affected (positively or negatively / permanently or temporarily), have an interest in, and/or influence the Project, including groups that may be differently or disproportionately affected due to their disadvantaged or vulnerable status.

The selection and analysis of stakeholders contribute to their prioritization, ensuring that the appropriate level of participation is defined for each stakeholder; it also helps determine the key parameters of engagement, including timing, location, and method of participation.

The prioritization of stakeholders involves analysing them based on selected parameters and characteristics in order to develop appropriate stakeholder management plans and effectively support the objectives of stakeholder management and engagement.

- While there are various models reflecting different approaches, for this Project the chosen criteria were: the impact on stakeholder interests and their influence on Project outcomes, enabling a better understanding of the following:
- How and to what extent stakeholder interests are expected to be affected by the Project.
- How different stakeholders may influence the Project and the risks or opportunities associated with it.
- The most appropriate level and method of engagement.

The stakeholders identified are classified into three main categories based on their expected involvement with Project activities, as follows:

- Primary stakeholders: Stakeholders whose interests may be directly affected by the Project and who can exert significant influence over it.
- Potentially active (secondary) stakeholders: Stakeholders likely to influence the Project and/or who may experience indirect impacts.
- Other stakeholders: Stakeholders who may express opinions and/or concerns but are unlikely to experience any impact from the Project or influence it

The level of participation takes into account the above prioritization and the purpose of engagement (type of relationship/desired outcome). Four levels of participation are identified: information, consultation, active participation, and collaboration. Each level of participation is linked to a broadly defined purpose, as presented below.

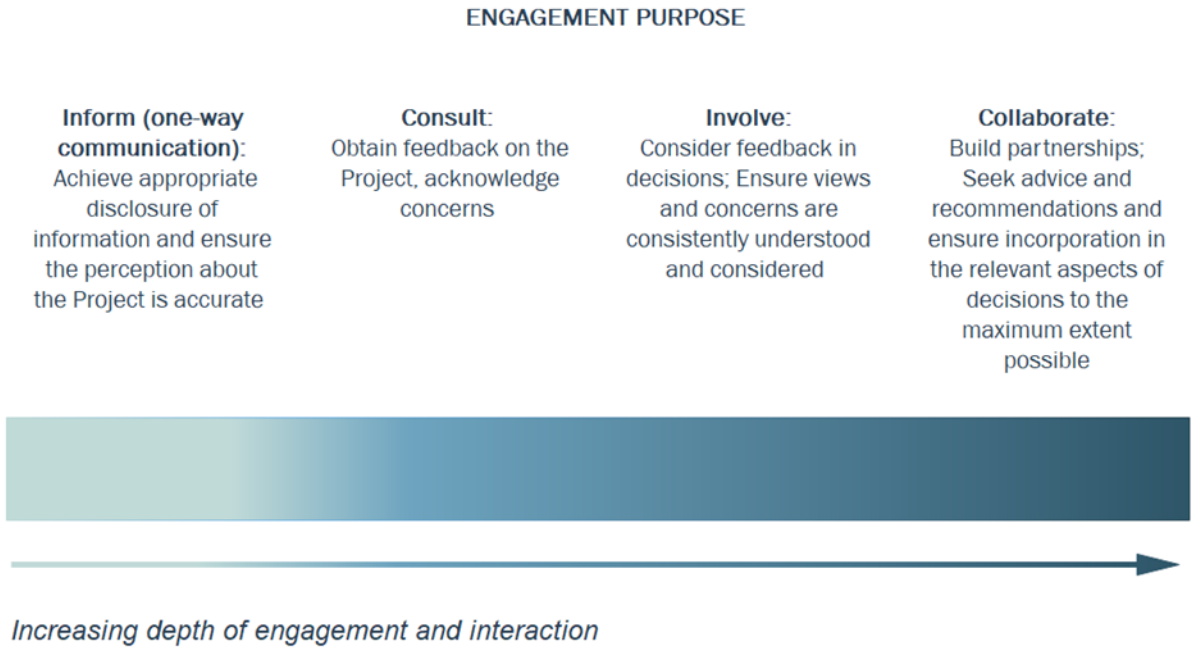


Image 4–1: Engagement Purpose

Table 5: Stakeholder prioritization matrix

Impact on Interests			
High	Inform Consult	Inform Consult Involve	Inform Consult Involve Collaborate
Medium	Inform Consult as needed	Inform Consult Involve as needed	Inform Consult Involve Collaborate as needed
Low	Inform	Inform Consult as needed	Inform Consult Involve as needed
•	Low	Medium	High

Influence on the Project

Primary stakeholders
Potentially active stakeholders
Other interested parties

As the Project progresses, the list will be updated.

4.2 IDENTIFICATION AND PRIORITIZATION OF STAKEHOLDERS

The identification and analysis of stakeholder groups is of decisive importance for the purposes of the SEP, as well as for selecting the appropriate engagement mechanisms. Within the framework of the SEP, an initial exercise of stakeholder identification, analysis, and mapping was carried out, aiming to capture influence relationships and lay the foundation for the development of the SEP.

Energean has been active in the Prinos area since 2007, following its acquisition of Kavala Oil SA, and has therefore developed extensive knowledge of the local stakeholder landscape. Stakeholder identification for this project has been informed by this longstanding engagement, as well as by detailed analyses conducted during the ESIA Phase process. The identification process considers the project's area of influence, including statutory authorities, relevant local and regional actors, and other stakeholders with an interest in social and environmental issues, ensuring a comprehensive understanding of stakeholders potentially affected by or involved in the project.

As the Project progressed, this initial analysis was further developed through the creation of the Stakeholder Register Log. The Stakeholder Register Log is a detailed and dynamic tool in Excel format, which facilitates the understanding of:

- The groups affected by the Project and how they are affected.
- How stakeholders can exert influence on the Project, as well as the risks or opportunities related to this influence.

The stakeholder identification in the Stakeholder Register Log is structured as follows:

- Classification into Macro-Groups – Stakeholders are initially categorized into broad Macro-Groups:
  - National Authorities and Institutions
  - Regional and Local Authorities
  - Local population
  - Employees
  - Private sector organizations involved in Project implementation
  - Mass Media (Media)
  - Civil Society (Chambers, Associations & Professional Bodies)
  - Civil Society (NGOs & Activists)
  - Educational and Scientific Institutions
  - General public
- Definition of stakeholder groups – Further sub-categorization tailored to the local context, aiming to improve engagement strategies (e.g., Central Government Authorities, Public Safety & Order Services, Local Communities, Local Businesses/Professionals, Fishers & Fisher Collectives, Vulnerable Groups, etc.).

- Identification of entity (name) and additional details regarding organizational structure, where required (e.g., relevant departments or specialized units within the entities identified).
- Contact information – Publicly available phone numbers, emails, websites, social media. No personal data was collected or processed, in line with GDPR (Article 4(10), Regulation (EU) 2016/679) and Regulation (EU) 2018/1725.
- Local classification to determine the operational scope and influence of the entity (Local, National, International).

The prioritization of stakeholders follows the approach described in Chapter 3.1 (Impact on interests / Influence on the Project), also taking into account the attitude (general position towards the Project), which is classified as follows.

- Positive
- Negative
- Neutral
- Uncertain

The Log is updated regularly to capture any changes in the composition of stakeholders, the outcomes of their engagement, as well as new information that emerges during the course of the Project.

Beyond its function as a record, the Stakeholder Register Log is used as a key management tool: It supports decision-making regarding the selection of appropriate engagement methods.

- It facilitates monitoring the effectiveness of consultation activities.
- It documents the Project's response to stakeholder comments and concerns.
- It provides a framework for the continuous adaptation and updating of the SEP.

The complete Stakeholder Register Log is attached as an Annex to the SEP.

To support clarity, the table below provides a consolidated overview of stakeholder groups identified to date, together with a prioritisation based on the methodology presented above.

Table 6: Stakeholder identification and prioritization

Group	Stakeholder	Description of potential Impact on Interests/Influence	Impacts	Influence	priority	Engagement Strategy
National Authorities and Bodies	Ministry of Environment and Energy Ministry of Labor and Social Security Ministry of Culture (includes Archaeology and Cultural Heritage) Ministry of Rural Development and Food (General Directorate of Fisheries) Ministry of Tourism Natural Environment and Climate Change Organization (OFYPEKA) - Management Unit of Nestos, Vistonida and Rodopi National Parks Other competent national bodies and services as defined by national legislation for environmental licensing.	Prominent role in the project with direct influence/impact through project decision-making, regulatory and permitting controls, etc. If their views/concerns are not taken into account, they may take actions that may jeopardize the Project	M	H	1	Information • Online/offline dissemination (events, project webpage, media, partner websites) • Press releases, newsletters, presentations, speeches Consultation • Consultation meetings, questionnaires • Tailored information materials • Monitoring/feedback reports (online/offline) Active Participation • Stakeholder meetings, roundtables, direct contacts/calls • Key informant interviews / focus groups • Feedback reports showing how issues raised were addressed Collaboration • Official correspondence and meetings with national government officials • Reports to relevant ministries on project updates • Regular and ad-hoc contacts, meetings, and calls • Monitoring/feedback reports covering all inputs received
Regional and Local Authorities	Decentralized Administration of Macedonia-Thrace (Directorate of Civil Protection, Department of Civil Defense (PAM) – Civil Emergency Planning (PSEA), Directorate of Environment and Spatial Planning of Eastern Macedonia – Thrace, Directorate of Waters of Eastern Macedonia – Thrace, Directorate of	Direct influence/impact on the Project through regulatory enforcement. Interest in the Project's impact on local safety, emergency planning, accident prevention, etc. If their views/concerns are not taken into account, they may	M	H	1	Information • Online/offline dissemination (events, project webpage, media, partner websites) • Press releases, newsletters, presentations, speeches Consultation • Consultation meetings, questionnaires • Tailored information materials • Monitoring/feedback reports (online/offline) Active Participation

Group	Stakeholder	Description of potential impact on interests/influence	Impacts	Influence	priority	Engagement Strategy
	Rural Affairs of Eastern Macedonia-Thrace Region of Eastern Macedonia and Thrace Regional unit of Kavala Municipal Councils of the municipalities of Kavala, Nestos, Pangaio and Thassos and relevant municipal departments (e.g. Directorate of Technical Services) Coast Guard - Hellenic Coast Guard (2nd Regional Administration) Fire Department (Regional Fire Department of Eastern Macedonia and Thrace, Kavala Fire Service) Ephorate of Underwater Antiquities, Ephorate of Antiquities of Kavala, Service of Modern Monuments and TW of EM&T	take actions that could jeopardize the Project				• Stakeholder meetings, roundtables, direct contacts/calls • Key informant interviews / focus groups • Feedback reports showing how issues raised were addressed Collaboration • Official correspondence and meetings with regional and local government officials and representatives • Regular and ad-hoc contacts, meetings, and calls • Monitoring/feedback reports covering all inputs received
Local Population, Local Businesses and Professionals	Residents of the municipalities of Kavala, Nestos, Pangaio and Thassos Residents of the Region of Eastern Macedonia and Thrace Hospitality and retail businesses in the area Local fishermen Local businesses active in the construction sector Professional associations (fishing, aquaculture, tourism, etc.)	Population living near the Project sites and related infrastructure, including local entrepreneurs Residents of communities located near the roads used for the transport of materials during construction Residents of the municipalities with wider economic interests linked to the project activities (e.g. employment, suppliers, etc.) This group has a high interest in the Project, as the majority of the population of the Kavala	H	M	1	Information • Online/offline dissemination (events, project webpage, media, partner websites) • Press releases, newsletters, presentations, speeches Consultation • Consultation meetings, questionnaires • Tailored information materials • Monitoring/feedback reports (online/offline) Active Participation • Stakeholder meetings, roundtables, direct contacts/calls • Key informant interviews / focus groups • Feedback reports showing how issues raised were addressed Collaboration • Regular and ad-hoc contacts, meetings, and calls

Group	Stakeholder	Description of potential impact on interests/influence	Impacts	Influence	priority	Engagement Strategy
		Bay area resides in the city of Kavala and the neighboring coastal suburbs and villages as well as on the island of Thassos and is likely to be affected by the Project. Fishermen are the main users of the sea. Their interest in the Project is high as their only source of income comes from the use of the sea.				• Frequent interactions with CLO and FLO as required throughout construction and operation to resolve grievances raised via the GRM. • Monitoring/feedback reports covering all inputs received
Vulnerable groups	Vulnerable groups refer to individuals who, due to gender identity, ethnicity, age, disability, economic disadvantage or social status, may be more adversely affected by the impacts of the project than others and who may be limited in their ability to claim or benefit from the project's benefits. Such individuals within the context of the Project are categorized as those living below the poverty line; Single-parent households; Households with members with disabilities; Elderly; Children	At this stage, no vulnerable group has been identified as potentially affected by the Project.	-	-		
Employees	Employees employed by EnEarth	The involvement and participation of employees in the implementation of the Project is important for the implementation of the Project Interest in employment Employee rights and working conditions Possible collective mobilizations may negatively	H	H	1	Information • Online/offline dissemination (events, project webpage, media, partner websites) • Press releases, newsletters, presentations, speeches Consultation • Consultation meetings, questionnaires • Tailored information materials • Monitoring/feedback reports (online/offline)

Group	Stakeholder	Description of potential impact on interests/influence	Impacts	Influence	priority	Engagement Strategy
		affect the implementation schedule of the Project				Active Participation • Stakeholder meetings, roundtables, direct contacts/calls • Internal HR and recruitment procedures • Training on social and environmental responsibilities • Worker grievance mechanisms • Monitoring/feedback reports covering all inputs received
Private sector organizations involved in the Project Implementation	Contractors, subcontractors, suppliers and their personnel	Contractors and subcontractors will be involved in the activities to implement the project, as well as ensuring compliance with labor rights and working conditions standards. They are directly involved in the development of each location and have a direct interest in its success They are interested in labor rights, working conditions, health and safety.	H	H	1	Information • Online/offline dissemination (events, project webpage, media, partner websites) • Press releases, newsletters, presentations, speeches Consultation • Consultation meetings, questionnaires • Tailored information materials • Monitoring/feedback reports (online/offline) Active Participation • Stakeholder meetings, roundtables, direct contacts/calls • Contractor control and monitoring of contractor performance and contractual E&S requirements by Enearth and Energean • Risk screening, adherence with EnEarth/Energean Code of Conduct for suppliers. Site visits and due diligence prior to selection of supplier, prior to construction and as needed throughout construction period. • Performance and reporting by contractors • Bulletin updates (via email, SMS, and notice boards) on project developments and Worker Grievance Procedure • Feedback reports showing how issues raised were addressed Collaboration • Regular and ad-hoc contacts, meetings, and calls • Monitoring/feedback reports covering all inputs received
Media	International, national and local media including Print, Radio, Television, Online media (social media, websites, blogs, etc.)	Cover news related to the project on an ongoing basis	L	M	2	Information • Online/offline dissemination (events, project webpage, media, partner websites)

Group	Stakeholder	Description of potential impact on interests/influence	Impacts	Influence	priority	Engagement Strategy
		Inform the public and individual groups about key aspects of the Project Have the ability to exert influence by acting as information transmitters, allowing for the outreach of wider audiences.				• Press releases, newsletters, presentations, speeches Consultation as needed • Consultation meetings, questionnaires • Tailored information materials • Monitoring/feedback reports (online/offline)
Civil Society	Non-Governmental Organizations (NGOs) e.g. Society for the Protection of Nature and Eco-Development, Ecological Movement of Kavala, Greenpeace Greece, WWF Greece, Hellenic Ornithological Society and other possible national and international NGOs that may be interested in the Project Think Tanks e.g. Institute of Energy of South-East Europe (IENE), The Hellenic Association for Energy Economics (HAEE) Professional organizations. Indicatively, these may include the Technical Chamber of Greece/Regional Department of Eastern Macedonia, Chamber of Commerce and Industry of Kavala, Labor Center of Kavala Prefecture, etc.) Other organizations of the Civil Service (e.g. Nautical Club of Kavala, the Kavala Water Sports Club)	Interest in environmental and social issues They can act as information relay agents to disseminate information about the Project Professional organizations may have a financial or other interest in the Project, either as suppliers or as organizations primarily associated (directly or indirectly) with construction materials and other supplies. They also provide expert opinions and advice on specific aspects of the Project that are relevant to their area of expertise.	M	M	2	Information • Online/offline dissemination (events, project webpage, media, partner websites) • Press releases, newsletters, presentations, speeches Consultation • Consultation meetings, questionnaires • Tailored information materials • Monitoring/feedback reports (online/offline) Active Participation as needed • Stakeholder meetings, roundtables, direct contacts/calls • Key informant interviews / focus groups • Feedback reports showing how issues raised were addressed

Group	Stakeholder	Description of potential impact on interests/influence	Impacts	Influence	priority	Engagement Strategy
Educational and Scientific Institutions	Universities and Educational Organizations (e.g. Democritus University of Thrace (DUTH), Fisheries Research Institute)	Possibly have a scientific interest in the project (research, education and training related to the Project)	M	M	2	Information • Online/offline dissemination (events, project webpage, media, partner websites) • Press releases, newsletters, presentations, speeches Consultation • Consultation meetings, questionnaires • Tailored information materials • Monitoring/feedback reports (online/offline) • Active Participation as needed • Stakeholder meetings, roundtables, direct contacts/calls • Key informant interviews / focus groups • Feedback reports showing how issues raised were addressed
General population outside the wider Project area		The general public may be interested in the Project because it can contribute positively to innovation and provide opportunities for building knowledge and expertise.	L	L	3	Information • Online/offline dissemination (events, project webpage, media, partner websites) • Press releases, newsletters, presentations, speeches

Primary stakeholders
Potentially active stakeholders
Other interested parties

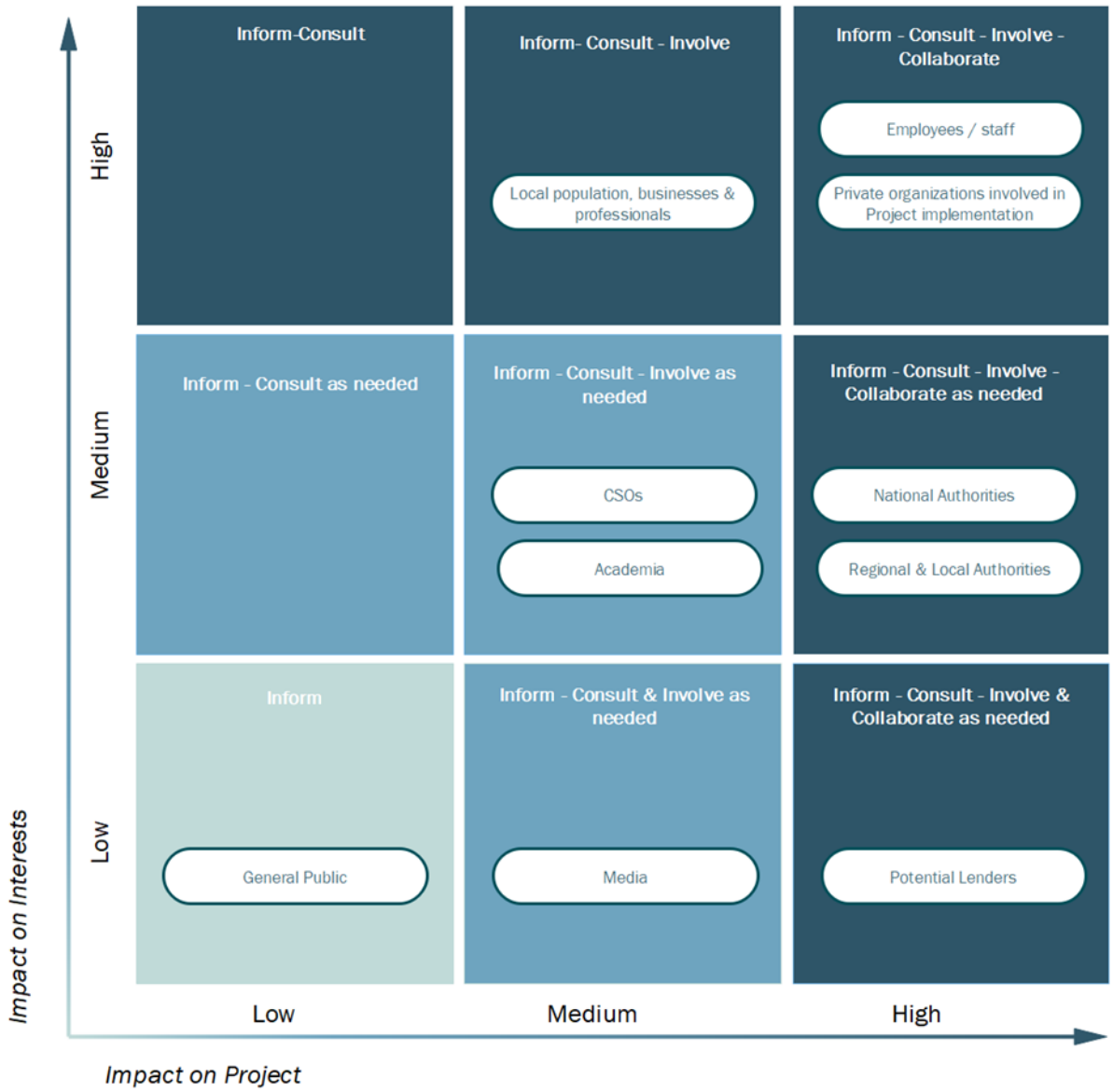


Figure 1: Stakeholder Map (Macro-Groups)

Recognizing the importance of engaging all stakeholders, the specific reference to vulnerable groups is a critical element of the participation process, in line with the requirements of ESR 10. The identification of vulnerable groups enables the proper design and implementation of engagement strategies to ensure that:

- Individuals or groups that may be disproportionately affected by the Project receive special consideration and access to information.
- The participation process is fair, inclusive, and accessible to all stakeholders.
- Potential risks to vulnerable groups are identified in a timely manner and appropriate mitigation measures are taken.

- Decision-making is based on a full understanding of the different needs and impacts across various population groups.

At the current stage of the Project, no vulnerable groups have been identified as being disproportionately affected by it. For the purposes of the Project, vulnerable groups were indicatively defined as:

- People living below the poverty line,
- Single-parent families,
- Families with members with disabilities
- Elderly people,
- Children.

This assessment is based on the fact that the main activities take place offshore, reducing direct exposure for coastal or inland communities, while onshore works are carried out in established industrial areas and port facilities, where public access is already restricted.

5 PREPARATION OF THE STAKEHOLDER ENGAGEMENT PLAN (SEP)

5.1 APPROACH FOR DETERMINING THE METHOD AND FREQUENCY OF ENGAGEMENT

To achieve the desired level of participation and the defined objectives, the right combination of tools and channels must be selected and applied at the appropriate stage of the Project. The following table summarizes the approach regarding the methods that contribute to ensuring information disclosure and meaningful consultation throughout the Project's lifecycle, so that stakeholders can participate appropriately. This list is not exhaustive

Table 7: Purpose and method of participation

	Information	Consultation-Dialogue	Active Participation	Collaboration
Method (Channels & Tools)	• Online - offline dissemination (in-person/online events, dedicated project website/webpage – other stakeholders' websites – media) • • Press releases – project newsletters – project presentations – speeches (key project information, benefits/opportunities, progress, etc.)	• Consultation Meeting • Questionnaires • Tailored materials Monitoring/feedback reports online or offline regarding participation outcomes	• Stakeholder meetings • Roundtables with facilitated sessions • Ad-hoc direct contacts and calls • Key informant interviews / focus groups • Monitoring/feedback reports demonstrating the understanding and consideration of issues	• Regular and ad-hoc direct contacts, discussions, meetings, and phone calls • Monitoring and feedback reports online or offline covering all comments/ inputs received.
GRIEVANCE MECHANISM				

The frequency of interaction is determined based on the stakeholder prioritization, where the higher the levels of impact and influence, the more frequent and personal the interaction, as shown in the figure below:

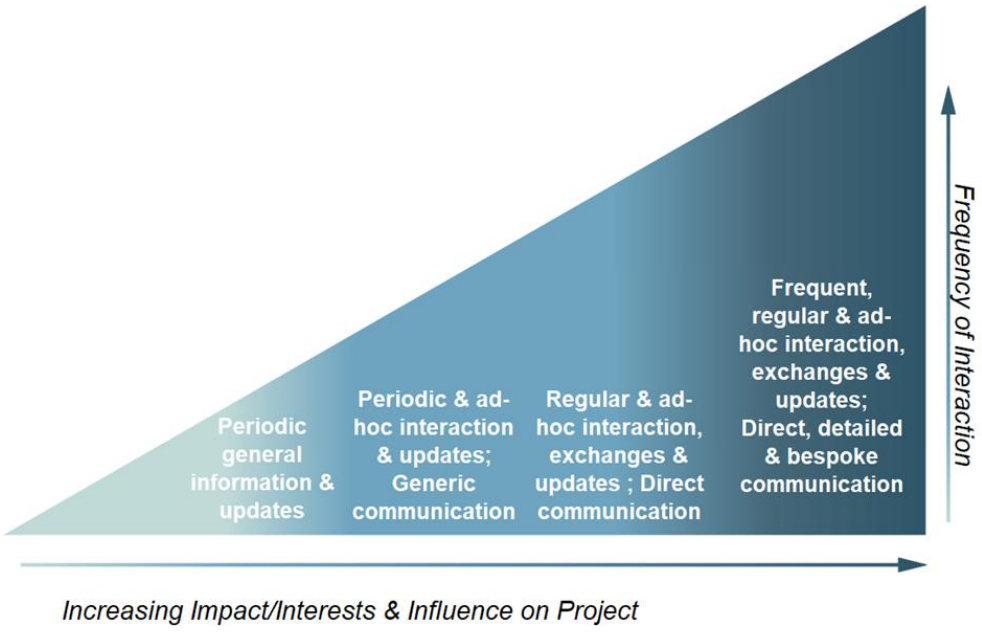


Figure 2: Frequency of Interaction

5.2 APPROACH TO INFORMATION DISCLOSURE AND EXCHANGE

The choice of method and medium for information disclosure/exchange takes into account how stakeholders typically access information and communicate. Therefore, disclosures and communication are carried out mainly in the local language (Greek), in an accessible, free, and appropriate manner, both offline (e.g., newspapers) and online (e.g., websites), taking into account the rules and requirements of specific administrative bodies and authorities. In any case, a variety of communication methods are used to reach all stakeholders. When reaching certain stakeholder groups presents challenges, either due to their nature or size (e.g., the general public), it is necessary to identify appropriate intermediaries who can act as channels to enable meaningful participation of the targeted stakeholders. For some communications/reports, English may also be used to meet the requirements of institutions (e.g., EBRD) and/or other authorities. Finally, depending on the technical knowledge of each stakeholder group, it may be necessary to adapt the presentation of technical information into plain language, making the information more accessible to the audience.

5.3 APPROACH FOR THE MANAGEMENT OF THE SEP

EnEarth is responsible for managing the SEP, with specific responsibilities assigned to designated staff positions, as presented in the table below. The table outlines the main positions involved in managing the SEP and the responsibilities of each position. The implementation of the SEP is systematically monitored and evaluated throughout the duration of the Project to ensure the effectiveness of stakeholder engagement; the deliverables/tools used for monitoring and documenting activities, as well as the reporting and updating schedule can be found in Section 7.

Table 8: Staff structure and responsibilities for SEP management

Position / Role	Key Responsibilities
(Stakeholder Engagement Manager) Sotiris Chiotakis, Head of Corporate Communications & Corporate Affairs, Greece, the Balkans, and Southeast Europe	• Oversight of SEP implementation • Coordination of SEP management staff • Monitoring performance and feedback indicators
(Monitoring & Reporting Officer) Artemis Barbounis, Corporate Affairs Manager, Greece	• Recording and analysis of engagement activities • Updating the Stakeholder Register Log • Contribution to the preparation of progress reports and revisions
(Grievance Mechanism Officer) Panos Karatokis, HSE Manager, Greece	• Management and documentation of grievances, monitoring responses • Providing feedback into the SEP
Community Liaison Officer (CLO) Artemis Barbounis, Corporate Affairs Manager, Greece	• Liaison with local communities • Collecting comments and concerns and informing the public about Project activities
Fisheries Liaison Officer (FLO) Artemis Barbounis, Corporate Affairs Manager, Greece	• Liaison with fishing communities and associations • Collection of feedback on marine activities • Support for impact mitigation measures

5.4 DISCLOSURE STRATEGY AND STAKEHOLDER ENGAGEMENT ACTION PLAN (DSEP)

The Project's disclosure strategy aims to ensure timely, transparent, and reliable information for all stakeholders, as well as to facilitate their meaningful participation in the decision-making process.

It is based on the following principles:

- Accessibility: All Project information will be available in an understandable format, using clear and simple language tailored to the needs of different groups.
- Transparency: The information disclosed will be complete, accurate, and up to date, in order to strengthen stakeholder trust
- Consistency and systematization: Disclosure actions will follow a predefined schedule, as described in the relevant columns of the Stakeholder Register Log, with provisions for additional actions where needed.
- Two-way communication: Disclosure will not be limited to one-way information sharing but will include consultation, dialogue, and active participation, depending on the stakeholder category.

In this context, disclosure is organized into three main levels:

General information for the wider public through postings on official websites, press releases, media publications, and regular updates on Project progress.

Targeted information and dialogue with national, regional, and local authorities, professional and scientific bodies, NGOs, and civil society representatives, through presentations, technical meetings, and thematic sessions.

Consultation and collaboration with primary stakeholders, particularly in cases where environmental or social issues arise that affect specific groups, ensuring that their views are incorporated into Project design and environmental permitting.

The SEP included a Stakeholder Engagement Action Plan (SEAP) for Phases 1 and 2. As the Project progresses, both stakeholder analysis and engagement activities are integrated into and reflected in the Stakeholder Register Log, which contains a dedicated "Stakeholder Engagement Action Plan" section with the following information:

- Purpose of Engagement (Information, Dialogue, Active Participation, Collaboration)
- Action
- Indicative timing and frequency
- Indicators for monitoring and evaluation

In this way, the effectiveness of activities is monitored, and continuous adaptation is made possible. The disclosure strategy is supported by the Grievance Mechanism, which is a key tool for enhancing transparency, identifying concerns in a timely manner, and fairly managing disputes. All planned activities of the Project are included in the Stakeholder Register Log (Annex 1), with implemented actions incorporated as the project progresses. The tables below provide an overview of planned stakeholder engagement activities by project phase.

Table 9: Pre-construction Phase Engagement

Stakeholder Group	Actions	Description	Proposed Performance Indicators
All stakeholders	Disclosure of the project description and rationale, along with relevant environmental and social documentation detailing project timeline, activities, potential risks and impacts, and proposed mitigation measures, in line with EBRD disclosure requirements.	As part of the pre-construction stakeholder engagement, EnEarth will undertake formal disclosure of key project information and documentation. All disclosure documents will be made available on the project website (https://www.enearth.earth/what-we-do, https://www.enearth.earth/el/what-we-do) by 3 October 2025. A hard copy version of the ESIA documents in English and Greek will also be made available by 17 October 2025 at the following locations: • Kavala Chamber of Commerce • Project office (to be designated) The disclosure package will include the following documents: 1 Non-Technical Summary (NTS) 2 Stakeholder Engagement Plan (SEP) and Annexes	• Number of meetings, consultations, and information events held • Attendance and participation rates • Stakeholder feedback and integration into project decisions

Stakeholder Group	Actions	Description	Proposed Performance Indicators
		3 Supplementary Environmental & Social (E&S) Report 4 Environmental and Social Action Plan (ESAP) – prepared by ERM 5 Environmental and Social Management and Monitoring Plan (ESMMP) 6 Phase 1 ESIA Report 7 Phase 1 ESIA Maps and Drawings 8 Phase 1 ESIA Key Annexes (Chemical Use Plan, CO_2 Monitoring and Mitigation Plan, Construction Management Plan, Waste Management Plan, Appropriate Assessment (SEA)) 9 Phase 1 ESIA Other Annexes 10 Phase 1 Amendment ESIA 11 Phase 1 Amendment ESIA Maps and Drawings 12 Phase 1 Amendment ESIA Key Annexes (Chemical Use Plan, CO_2 Monitoring and Mitigation Plan, Construction Management Plan, Waste Management Plan, Appropriate Assessment (SEA)) 13 Phase 1 Amendment ESIA Other Annexes EnEarth will inform all stakeholders of the availability of these documents, as set out in the Stakeholder Engagement Plan, and provide details of the mechanisms through which stakeholders can submit feedback to the project. A public meeting (or similar event) will be hosted in Kavala during the EBRD's 60-day disclosure period to present the findings of the ESIA.	
National Government Authorities	Collaboration, regulatory submissions, information sharing, and compliance monitoring. Implemented: Informative meetings, tailored information materials, ESIA phase 1	During the preconstruction phase, EnEarth is engaging with national authorities through official submissions of the ESIA Phase 1 and related documentation to the competent authorities (e.g., DIPA) in accordance with national legislation. Meetings are conducted to ensure regulatory requirements, address requests for additional information, and ensure alignment with national environmental and social standards. Key actions include sharing the project scope, planned schedule, and anticipated impacts, as well as providing updates on ESIA progress and responding to official feedback.	• Number of meetings, consultations, and information events held • Number of press releases/publications Attendance and participation rates • Stakeholder feedback and integration into project decisions

Stakeholder Group	Actions	Description	Proposed Performance Indicators
Regional & Local Authorities	Information sharing, dialogue/consultation, and coordination on permitting, impacts, and mitigation Implemented: Informative meetings, tailored info materials, ESIA phase 1	Engagement includes one-to-one meetings and briefings with regional and municipal authorities to present the project, ESIA, and permitting procedure. Discussions focus on potential local impacts, mitigation measures, and integration of feedback into project design. Key documents (NTS, SEP, ESAP) will be made available.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Stakeholder feedback and integration into project decisions
Local Communities	Information dissemination, consultation meetings, feedback integration, and grievance handling. Implemented: Informative meetings, press releases, online webpages, ESIA phase 1	Project information disclosure through official websites and ESIA Phase 1. This includes the scope, schedule, anticipated impacts and benefits, employment opportunities. Organization of public consultation meetings on the ESIA phase 1, opportunities and impacts Responses to FAQs are updated regularly, and feedback from communities will be incorporated into project planning.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Employees	Internal communication, induction, safety training, and grievance procedures. Implemented: Informative sessions, tailored materials	Prior to construction, EnEarth informs (future) project employees about the scope, schedule, expected roles, grievance procedures, and health and safety protocols. Introductory briefings and information materials will be shared. Channels will be established for employees to raise questions or concerns even before project activities begin.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Private sector organizations (involved in the Project Implementation)	Information sharing, business opportunity engagement Implemented: Online webpages, ESIA phase 1	Contractors and suppliers will receive early briefings on the project scope, schedule, ESIA phase 1 findings, and environmental and social standards. Meetings will outline procurement processes, reporting obligations, and grievance procedures. Engagement will ensure alignment with EnEarth's policies and expectations from the outset.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Stakeholder feedback and integration into project decisions

Stakeholder Group	Actions	Description	Proposed Performance Indicators
Media	Press releases, briefings, and interviews for public information dissemination. Implemented: Press releases; briefings	Press releases were disseminated, media briefings, and interviews will be organized to disseminate project information, including scope, schedule, benefits, and ESIA phase 1 highlights. Media is encouraged to report accurately on consultations and stakeholder engagement processes.	• Number of meetings, consultations, and information events held Number of press releases/publications • Attendance and participation rates
Civil Society	Information sharing, consultation, dialogue on environmental and social issues Implemented: Informative meetings, conferences, tailored information materials, ESIA phase 1	Civil society organizations will be informed of the project objectives, ESIA phase1, and expected impacts through targeted consultations and presentations. Opportunities for input on environmental and social issues will be provided during public consultation meetings.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Educational and Scientific Institutions	Information sharing, collaboration on monitoring and research, and knowledge transfer. Implemented: Informative meetings, conferences, tailored information materials, ESIA phase 1	Universities and research institutes will be engaged to present project objectives and ESIA content. Potential areas of collaboration, such as environmental monitoring or social research, will be explored. Relevant documentation will be shared with these institutions.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
General Public (outside project area)	Via Media / CSOs		

Table 10: Construction Phase Engagement

Stakeholder Group	Actions	Description	Proposed Performance Indicators
National Government Authorities	Collaboration, regulatory submissions, information sharing, and compliance monitoring.	Regular reporting on construction progress, compliance with permitting conditions, and any changes in project scope will be shared with national authorities. Requests for inspections or clarifications will be promptly addressed. Official correspondence will continue throughout the phase.	• Number of meetings, consultations, and information events held • Number of press releases/publications Attendance and participation rates • Stakeholder feedback and integration into project decisions
Regional & Local Authorities	Information sharing, dialogue/consultation, and coordination on permitting, impacts, and mitigation	Engagement includes one-to-one meetings and briefings with regional and municipal authorities to present permitting procedures. Communication will include construction updates, schedules, and mitigation measures. Meetings will be held to address local concerns and coordinate on community impacts. Authorities will be informed of major construction milestones and incidents.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Stakeholder feedback and integration into project decisions
Local Communities	Information dissemination, consultation meetings, feedback integration, and grievance handling.	Community meetings will present updated construction schedules, workforce plans, and mitigation measures. Webpage will display construction updates; on the website and at site entrances grievance contacts, and contractor details will be accessible. Feedback from affected communities will guide adjustments in project activities.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Employees	Internal communication, induction, safety training, and grievance procedures.	Induction trainings on environmental and social management plans, health and safety procedures, and grievance mechanisms will be held. Regular meetings will ensure employees are informed of project progress, safety updates, and changes in working conditions.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions

Stakeholder Group	Actions	Description	Proposed Performance Indicators
Private sector organizations involved in the Project Implementation	Coordination, reporting, compliance monitoring, and grievance resolution.	Regular coordination meetings with contractors and suppliers will review construction schedules, performance expectations, and compliance with E&S standards. Reporting on incidents, grievances, and mitigation actions.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Media	Press releases, briefings, and interviews for public information dissemination.	Construction updates, milestone announcements, and responses to emerging issues will be shared with media through press releases and briefings. Accurate public communication will be encouraged to build understanding and trust.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates
Civil Society	Information sharing, consultation, dialogue on environmental and social issues	Civil society organizations will be updated on construction progress and mitigation measures. Targeted discussions will be held on issues of social or environmental concern, and their input will inform ongoing project adjustments.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Educational and Scientific Institutions	Information sharing, collaboration on monitoring and research, and knowledge transfer.	Opportunities for collaboration in environmental and social monitoring during construction will be explored. Updates on project performance and monitoring data will be shared with academic and scientific partners.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
General Public (outside project area)	Via Media / CSOs		

Table 11: Operation Phase Engagement

Stakeholder Group	Actions	Description	Proposed Performance Indicators
National Government Authorities	Collaboration, regulatory submissions, information sharing, and compliance monitoring.	Periodic reporting on operational performance, compliance with permit conditions, and monitoring data will be submitted. Meetings will be held to review performance and address any regulatory updates.	• Number of meetings, consultations, and information events held • Number of press releases/publications Attendance and participation rates • Stakeholder feedback and integration into project decisions
Regional & Local Authorities	Information sharing, dialogue/consultation, and coordination on permitting, impacts, and mitigation	Annual or biennial meetings to discuss issues or challenges identified during operations, and collaborative solutions will be sought. Ongoing communication will include updates on performance, incidents, and mitigation actions.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Stakeholder feedback and integration into project decisions
Local Communities	Information dissemination, consultation meetings, feedback integration, and grievance handling.	Focus groups and/or community meetings will monitor impacts, inform stakeholders about available support services, and seek feedback on operational performance. Information on grievance handling and updates on project performance will be shared.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Employees	Internal communication, induction, safety training, and grievance procedures.	Continuous training, internal communication, and grievance handling will ensure workforce engagement. Updates on operational changes and safety protocols will be shared regularly.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions

Stakeholder Group	Actions	Description	Proposed Performance Indicators
Private sector organizations involved in the Project Implementation	Coordination, reporting, compliance monitoring, and grievance resolution.	Coordination on performance reporting, compliance monitoring, and corrective actions will continue. Meetings will address operational challenges and continuous improvement measures.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Media	Press releases, briefings, and interviews for public information dissemination.	Operational performance updates, key milestones will be shared. Media engagement will focus on transparent communication and addressing public concerns.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates
Civil Society	Information sharing, consultation, dialogue on environmental and social issues	Civil society input on ongoing environmental and social impacts will be sought through consultations.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Educational and Scientific Institutions	Information sharing, collaboration on monitoring and research, and knowledge transfer.	Partnerships on monitoring, research, and knowledge-sharing will continue. Results of environmental and social performance will be shared for academic and research purposes.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
General Public (outside project area)	Via Media / CSOs		

Table 12: Decommissioning Phase Engagement

Stakeholder Group	Actions	Description	Proposed Performance Indicators
National Government Authorities	Collaboration, regulatory submissions, information sharing, and compliance monitoring.	Engagement will focus on regulatory approvals, decommissioning plans, and post-closure monitoring requirements. Reporting obligations will be fulfilled and feedback from authorities will guide final decommissioning activities.	• Number of meetings, consultations, and information events held • Number of press releases/publications Attendance and participation rates • Stakeholder feedback and integration into project decisions
Regional & Local Authorities	Information sharing, dialogue/consultation, and coordination on permitting, impacts, and mitigation	Meetings will outline decommissioning schedules, impacts, and mitigation measures. Collaboration will ensure smooth transition and alignment with regional and local plans.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Stakeholder feedback and integration into project decisions
Local Communities	Information dissemination, consultation meetings, feedback integration, and grievance handling.	Consultations will inform communities of decommissioning timelines, plans, and post-closure activities.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Employees	Internal communication, induction, safety training, and grievance procedures.	Information on workforce transitions, support, and grievance procedures will be shared. Support will be provided for employees affected by project closure.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Private sector organizations involved in the Project Implementation	Coordination, reporting, compliance monitoring, and grievance resolution.	Contractors and suppliers will be engaged on decommissioning schedules, performance expectations, and compliance requirements.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
Media	Press releases, briefings, and interviews for public information dissemination.	Press releases and briefings will communicate the decommissioning schedule, objectives, and outcomes. Media will be used to inform the public about post-closure site conditions.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates
Civil Society	Information sharing, consultation, dialogue on environmental and social issues	Consultations will focus on social and environmental implications of decommissioning.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions

Stakeholder Group	Actions	Description	Proposed Performance Indicators
Educational and Scientific Institutions	Information sharing, collaboration on monitoring and research, and knowledge transfer.	Partnerships on post-closure monitoring and relevant research will be explored. Results will be shared for knowledge transfer.	• Number of meetings, consultations, and information events held • Number of press releases/publications • Attendance and participation rates • Number and resolution rate of grievances • Stakeholder feedback and integration into project decisions
General Public (outside project area)	Via Media / CSOs		

6 GRIEVANCE MECHANISM[1]

6.1 MANAGEMENT AND TIMELINE FOR THE ACKNOWLEDGMENT AND SUBSEQUENT RESOLUTION OF GRIEVANCES

The grievance mechanism has been designed by EnEarth for the Co2 storage project in Prinos to ensure that all stakeholders will have the opportunity to submit their comments or complaints freely and transparently. The objective of the Grievance Mechanism process is to review and ensure an appropriate response to potential comments, complaints and appeals from external stakeholders, including the local population affected by the Project. Stakeholders will be able to raise concerns through multiple channels, including online contact forms, in-person submissions, post, and email. This grievance mechanism will be accessible in both English and Greek to facilitate inclusivity and is intended to serve as a vital tool in fostering trust and constructive dialogue with affected communities and interested parties as it becomes fully operational.

EnEarth holds responsibility for managing and handling grievances and appeals. The designated staff member, the Grievance Mechanism Officer, receives and records grievances, communicates with the relevant departments, and oversees responses to stakeholder complaints and requests.

At present, stakeholders can submit their comments or complaints through the existing online contact forms available on every page of the Company's website, with a clear note stating: "You can write your message or complaint here." On each page of the website https://www.enearth.earth/ . The Grievance Form is available in Section 6.3 below and is available in English and Greek. Any person or organisation may send comments or complaints in person, via post, by email, or through using this contact form.

Once selected, the contact details of the construction contractor will also be made available in the local municipality. Contractors are required to manage grievances in alignment with EnEarth Prinos CO2's grievance process.

[1] This grievance mechanism has been developed specifically for the Prinos CO_2 Storage Unit project in accordance with the requirements of EBRD ESR10 on stakeholder engagement. It is intended for use by external stakeholders to submit feedback, concerns, or complaints related to the Prinos CO_2 Storage Unit project. It is separate and distinct from (i) the workers' grievance mechanism required under EBRD ESR2, which addresses employment-related matters and workplace concerns raised by project workers, and (ii) the grievance mechanism established for the Prinos oil and gas operations, which pertains to a different project. This project-specific grievance mechanism applies exclusively to the Prinos CO_2 Storage Unit project.

All complaints, views, and appeals—without exception—will be entered and recorded in the Project's grievance database and assigned a tracking identification number. The grievance mechanism explicitly allows anonymous submissions to ensure safe and confidential access for all stakeholders, in line with EBRD ESR 10 requirements. However, an acknowledgment of receipt and registration of the complaint/appeal will be sent to the submitter within seven days only if contact information is provided. For anonymous complaints without contact details, while direct responses or acknowledgments are not possible, they will be treated with equal seriousness, duly investigated, and corrective actions will be taken where necessary. The acknowledgment will include information about the follow-up process and specify the expected resolution date.

Responses will be provided for all stakeholder complaints and appeals within 30 days. Complainants will be free to choose their preferred method of communication, including in person, by phone, email, post, or other accessible means. If the complainant is not satisfied with the response and the proposed solution, the right of appeal will be granted to a secondary grievance resolution committee, which will include, among others, the Stakeholder Engagement Manager. Stakeholders who remain unsatisfied with this internal process will still have the right to escalate their grievance to state supervisory bodies or the courts for resolution.

- Under this procedure, all complaints received within the framework of the Project from third-party stakeholders will fall under the responsibility of the Grievance Mechanism Officer. The Officer will be responsible for:
- Recording and documenting all grievances in the database,
- Monitoring the progress of resolution,
- Communicating with stakeholders and providing written responses within the specified timeframes
- Coordinating any supportive roles (e.g., Community Liaison Officer for local community matters or Fisheries Liaison Officer for fisheries-related issues).
- Preparing semi-annual reports and feeding into the SEP review process.

The Stakeholder Engagement Manager will maintain an oversight role, ensuring that the grievance process is consistently followed (including by contractors) and that all grievances are handled discreetly and carefully, maintaining confidentiality and sensitivity. The manager will ensure that the non-retaliation policy is upheld and investigate any allegations of retaliation related to the grievance process. Additionally, the lessons learned from grievance management will be incorporated into the overall stakeholder engagement framework.

Details of the Grievance Mechanism Officer:

Panos Karatokis, Head of HSE Greece, pkaratokis@energean.com / pkaratokis@enearth.earth

Artemis Barbounis, Corporate Affairs Manager, Greece abarbounis@energean.com / abarbounis@enearth.earth

The Grievance Mechanism will be directly accessible through the official website: https://www.enearth.earth/el and https://www.enearth.earth/.

Anonymity will be possible for all complaints, and the principles of confidentiality, transparency, and non-retaliation provided in the Grievance Mechanism will be guaranteed.

As the Project progresses, any additional access channels to the Grievance Mechanism will be identified and utilized.

6.2 STAGES OF THE GRIEVANCE MANAGEMENT PROCESS

Effective management and handling of complaints and appeals is ensured through the following steps:

- Identification of the issue
- Registration of the grievance
- Acknowledgement of receipt to the stakeholder
- Investigation of the grievance
- Communication of the resolution to the complainant and request for feedback
- Completion – closing the grievance and implementing the resolution
- he Grievance Database will include the following information:
    - Issue
    - Contact details of the complainant
    - Person/department responsible for addressing the issue
    - Actions to be taken
    - Deadline
    - Proposed resolution
    - Comments from the complainant*
    - Results
    - Date of issue resolution

*If the complainant is not satisfied with the initial response:

- Right to appeal (secondary grievance resolution committee, including the Stakeholder Engagement Manager).
- Committee Review: The secondary committee reviews the grievance and all relevant documentation in the Grievance Database.
- Information considered includes:
    - Original grievance description
    - Person/department responsible for addressing the issue
    - Actions taken and deadlines
    - Proposed resolution
    - Complainant comments
- Proposed resolution
- Comments from the complainant.
- Completion (Grievance is closed, and the date of resolution is recorded in the Grievance Database) or further escalation (Complainants who remain unsatisfied retain the right to escalate the grievance to state supervisory authorities or courts)

Appropriate measures will always be taken to ensure that the procedures for collecting and processing personal data comply with the General Data Protection Regulation (EU) 2016/679.

6.3 GRIEVANCE FORM

Complaints and appeals may be submitted either in free written form or using the special Grievance Form presented below, which will soon be available both in specifically designated public locations and in digital format on the official Project website. In this way, all stakeholders will be able to submit complaints and appeals in person, by mail, email, phone, or fax, as well as through the website. Contact details will be provided on the website.

The proposed Grievance Form is presented below.

Ref. No.	
Name (State if you wish to remain anonymous or request that your identity not be disclosed to third parties without your consent)	
Relation to the Project:	
Tel.: optional	
E-mail: optional	
Fax: optional	
Address: optional	
Preferred method of communication (in person, by phone, email, post, or other):	
Preferred language:	
Description of the reason for submitting the complaint/appeal:	
Source, date, frequency, and duration of the problem:	
Your suggestions for resolving the issue:	
Date of submission:	
Please return the form to the address:	

In the event of financing by the EBRD, and in cases where the above mechanism proves unsuccessful, individuals and organizations may seek to address their concerns through the EBRD's Independent Project Accountability Mechanism (IPAM).

6.4 MONITORING THE FUNCTIONING OF THE GRIEVANCE MECHANISM

A database of complaints and responses (Grievance Log) will be developed by the Project entity. In addition, a report on the handling of complaints and appeals will be prepared on a regular basis (quarterly). The report will outline the substance of each complaint/appeal received, its validity, and the measures taken.

The Project will actively monitor the functioning of the grievance mechanism to ensure that grievances are being addressed effectively and that timelines for resolution are respected. This monitoring includes reviewing the status of each grievance, identifying delays or bottlenecks, and implementing corrective actions as needed to improve responsiveness and stakeholder satisfaction.

7 MONITORING, EVALUATION AND REPORTING

EnEarth is responsible for monitoring all stakeholder engagement activities related to the Project, including grievance handling, and for ensuring that stakeholder engagement activities are implemented as planned, are effective in meeting their objectives, and remain aligned with the evolving context of the Prinos CO_2 Storage Unit project. .

In accordance with EBRD ESR10, EnEarth has established a structured system for monitoring, evaluating, and reporting on stakeholder engagement and grievance management throughout the life of the project. The section below consolidates all monitoring and reporting activities, including KPIs previously referenced in the SEP tables, to provide a clear, systematic framework for assessing engagement effectiveness and timely grievance resolution.

Monitoring and Reporting activities will be led by the Stakeholder Engagement Manager in collaboration with the Grievance Mechanism Officer, Community Liaison Officer (CLO), and Fisheries Liaison Officer (FLO). Monitoring will be conducted quarterly, balancing the need for regular oversight with the project's anticipated low community impact.

7.1 MONITORING AND REPORTING

Engagement activities will be monitored at predetermined intervals (at least quarterly) and on an ad-hoc basis in response to urgent needs, new issues, or emerging stakeholder concerns.

The key objectives of monitoring and evaluation are to:

- Track implementation of planned engagement activities against commitments in the SEP.
- Assess the quality and effectiveness of engagement activities and disclosure processes.
- Identify recurring themes or emerging issues raised by stakeholders and adapt engagement accordingly.
- Evaluate the effectiveness of the grievance mechanism.
- Support continuous improvement of the SEP, ensuring that engagement remains inclusive, appropriate, and responsive to stakeholder needs.

7.1.1 Performance Indicators

Performance indicators are essential for assessing the effectiveness of stakeholder engagement and ensuring compliance with ESR10. EnEarth will monitor and report on the following indicators, consolidating them across all phases of the project:

- Engagement and disclosure Indicators
  - Number of meetings, consultations, and information events held.
  - Number of press releases, publications, and media communications issued by type of media (local, national, international, specialized press) and stance (positive, neutral, negative)
  - Attendance and participation rates (disaggregated by stakeholder group and gender where possible).

- Evidence of stakeholder feedback integrated into project decisions – including examples of how feedback influenced project design, mitigation measures, or engagement activities.

- Grievance mechanism indicators
  - Total number of grievances received, (disaggregated by category, stakeholder group and gender where possible).
  - Percentage of grievances resolved and percentage resolved within defined timeframes.
  - Number of recurring grievances by category.
  - Qualitative trends in grievance content and recurrence.
- Evaluation and Continuous Improvement Indicators
  - Number of SEP reviews and updates conducted.
  - Frequency and accuracy of updates to the stakeholder register.
  - Adequacy of allocated resources for stakeholder engagement.
  - Summary of key grievance themes and resolution approaches disclosed in annual external reports.

7.1.2 Monitoring Activities

Monitoring will include the systematic recording and review of:

- All stakeholder engagement activities conducted.
- Stakeholder feedback and comments received.
- Actions taken to respond to stakeholder concerns.
- The management and resolution of grievances.

Monitoring activities will be led by the Community Liaison Officer (CLO) or Grievance Mechanism Officer as required, and will include:

- Stakeholder Engagement Monitoring
  - Quarterly review of the Stakeholder Register Log, meeting minutes, disclosure records, and engagement documentation.
  - Tracking the completion rate of commitments made to stakeholders during engagement.
  - Verification that all engagement activities and related outcomes have been documented appropriately and systematically filed.
- Grievance Mechanism Monitoring
  - Quarterly analysis of grievance logs to identify trends in stakeholder feedback and emerging issues.
  - Analysis of grievances by category, gender, and resolution status, including:
    - *Total number of grievances received.*
    - *Percentage resolved.*
    - *Percentage resolved within established timeframes.*

- Effectiveness analysis of the grievance mechanism by monitoring recurring grievances by category (e.g. dust, noise, traffic), which may indicate systemic issues requiring targeted management action.
- Ensuring that all grievances are recorded, acknowledged, investigated, and responded to within defined timelines.

- Media and Public Perception Monitoring
  - Quarterly review of media, press, radio, and online sources to identify news, commentary, or public sentiment relevant to the project.
  - Documentation and analysis of media trends to inform communication strategies and proactive engagement.
- Stakeholder Feedback Analysis
  - Regular review of stakeholder feedback to detect recurring themes or concerns and assess whether additional engagement, information, or mitigation measures are required.

Monitoring results will directly inform the ongoing implementation and improvement of the SEP and the overall stakeholder engagement strategy.

7.1.3 Evaluation of SEP Effectiveness

At least annually, EnEarth will conduct a structured review of the effectiveness of the SEP. This review will assess:

- Whether the stakeholder register remains accurate and comprehensive.
- The adequacy and appropriateness of engagement methods and frequency for each stakeholder group.
- The relevance and accessibility of disclosed information.
- The adequacy of the grievance mechanism, including accessibility, functionality, and resolution effectiveness.
- Whether sufficient resources (staffing, budget, tools) are in place to implement engagement activities effectively.
- Where required, the SEP will be updated based on the outcomes of this review.

7.2 REPORTING

Stakeholder engagement activities and outcomes will be systematically documented and reported, forming an essential feedback loop into project decision-making. Documentation will include:

- The updated Stakeholder Register Log, recording meetings held, participants invited and present, information shared, feedback received, responses provided, and any commitments made.
- The Grievance Log, tracking receipt, categorisation, and resolution of grievances, including resolution timeframes.
- Meeting minutes, monitoring reports, and simplified feedback summaries.

- A list of publications, press releases, and republications related to the Project, with sources and dissemination channels.

Monitoring results and engagement outcomes will be compiled into progress reports on at least a quarterly basis and integrated into annual external reports, which will include anonymised summaries of key grievance themes and how they have been addressed.

7.3 UPDATING THE SEP

The SEP is a living document. It will be updated at least annually, or more frequently as needed, based on:

- Project changes that affect stakeholder engagement.
- Results of monitoring and evaluation activities.
- Stakeholder feedback and evolving expectations.
- Performance review outcomes.

The updating process ensures that the SEP remains dynamic, responsive, and aligned with both ESR10 and the realities of project implementation. Updates will include revisions to the stakeholder register, engagement methods and frequency, grievance procedures, and allocated resources.

7.4 ROLES AND RESPONSIBILITIES

Effective monitoring, reporting, and updating require clear roles and responsibilities within EnEarth's stakeholder engagement team. The table below presents key personnel and their main responsibilities, deliverables, and reporting schedules.

Table 13: Roles and Responsibilities for Monitoring and Reporting

Position / Role	Deliverables / Tools	Frequency / Schedule
Stakeholder Engagement Manager – Sotiris Chiotakis, Head of Corporate Communications & Corporate Affairs, Greece, the Balkans, and Southeast Europe	Progress reports; revised SEPs	Quarterly; annual revisions/ad hoc
Monitoring & Reporting Officer – Artemis Barbounis, Corporate Affairs Manager, Greece	Stakeholder Register Log; progress reports; SEP revisions	Quarterly; annual revisions/ad hoc
Grievance Mechanism Officer – Panos Karatokis, HSE Manager, Greece	Grievance log; grievance handling reports; SEP revisions	Continuous monitoring; semi-annual reports; annual revisions/ad hoc
Community Liaison Officer (CLO) – Artemis Barbounis, Corporate Affairs Manager, Greece	Community engagement reports; SEP update proposals	Ad hoc; annual revisions
Fisheries Liaison Officer (FLO) – Artemis Barbounis, Corporate Affairs Manager, Greece	Fisheries community communication reports; SEP update proposals	Ad hoc; annual revisions

7.5 DATA PROTECTION AND CONFIDENTIALITY

All stakeholder engagement and grievance-related activities will be carried out in compliance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and applicable national legislation. Stakeholders' consent will be sought for any collection or processing of personal data. All reporting will use anonymised or aggregated data to protect individual privacy.

8 APPENDICES

8.1 IMPLEMENTED STAKEHOLDER ENGAGEMENT ACTIVITIES

Media Report

Date	Media Report	Reposting
EnEarth		
15-09-2025	https://www.enearth.earth/el/_files/ugd/ea191a_35d86a54798c4fe3abc8871ba8d9e68e.pdf	https://www.youtube.com/watch?v=WFxSdj31AzM https://www.youtube.com/watch?v=-TN0Rtf5CBI https://www.kavalapoint.gr/to-prasino-energy-observer-ston-prasino-prino-gia-tin-apothikefsi-co2/
01-07-2024	https://www.enearth.earth/el/_files/ugd/a147f3_0a12af6d84d64c409cd2ded7de456a74.pdf	https://www.enanews.gr/enearth-katatethike-i-aitisi-gia-adeia-apothikefsis-co2-ston-prino/ https://kavalawebnews.gr/eidiseis/energeia/enearth-katatethike-i-aitisi-gia-adeia-apothikefsis-co2-ston-prino/ https://nownews.gr/enearth-%CE%BA%CE%B1%CF%84%CE%B1%CF%84%CE%AD%CE%B8%CE%B7%CE%BA%CE%B5-%CE%B7-%CE%B1%CE%AF%CF%84%CE%B7%CF%83%CE%B7-%CE%B3%CE%B9%CE%B1-%CE%AC%CE%B4%CE%B5%CE%B9%CE%B1-%CE%B1%CF%80%CE%BF%CE%B8%CE%AE%CE%BA/
05-06-2025	https://www.enearth.earth/el/_files/ugd/a147f3_5ceb8afd81994d06a7a163c58f200d70.pdf	https://www.youtube.com/watch?v=V0yYeUVdg8k https://www.kavalapost.gr/energia-perivallon/318466/enearth-apo-tin-energean-gia-enan-kosmo-me-midenikes-ekpompes-co2/ https://www.proininews.gr/enearth-apo-tin-energean-stin-kavala-to-proto-pilotiko-ergo-desmefsis-dioxeidiou-tou-anthraka/
Energean		
15-09-2025	https://www.energean.com/media/6126/20250915-%CF%84%CE%BF-energy-observer-%CF%83%CF%84%CE%BF%CE%BD-%CF%80%CF%81%CE%AF%CE%BD%CE%BF.pdf	https://www.youtube.com/watch?v=-TN0Rtf5CBI https://www.youtube.com/watch?v=WFxSdj31AzM https://www.proininews.gr/to-prasino-energy-observer-ston-prasino-prino-gia-tin-apothikefsi-co2/
22-04-2025	https://www.energean.com/media/6016/20250321-%CF%84%CE%B5%CF%81%CE%BC%CE%B1%CF%84%CE%B9%CF%83%CE%BC%CF%8C%CF%82-%CF%83%CF%85%CE%BC%CF%86%CF%89%CE%BD%CE%AF%CE%B1%CF%82-%CE%BC%CE%B5-carlyle.pdf	https://www.youtube.com/watch?v=znB_TmUOdBc https://www.kavala-portal.gr/imera-tis-gis-mnimonio-enearth-kavala-solutions-tin-y/ https://www.kavalapost.gr/energia-perivallon/331601/imera-tis-gis-mnimonio-enearth-kavala-solutions-gia-tin-ypogeia-apothikeysi-co-ston-prino/

Date	Media Report	Reposting
14-11-2024	https://www.energean.com/media/5925/20241114-cop-29-%CE%B5%CE%BD%CE%B7%CE%BC%CE%B5%CF%81%CF%89%CF%84%CE%B9%CE%BA%CF%8C-%CF%83%CE%B7%CE%BC%CE%B5%CE%AF%CF%89%CE%BC%CE%B1-enearth-%CE%BD-%CF%81%CE%AE%CE%B3%CE%B1%CF%82.pdf	https://www.youtube.com/watch?v=NednIBxTXBo https://www.kavalapoint.gr/n-rigas-enearth-apo-tapio-proothimena-erga-stin-eyropi-to-prinos-co2-storage-krisimi-i-oikonomiki-viosimotita-olis-tisalysidas/ https://www.kavalapoint.gr/n-rigas-enearth-apo-tapio-proothimena-erga-stin-eyropi-to-prinos-co2-storage-krisimi-i-oikonomiki-viosimotita-olis-tisalysidas/
30-09-2024	https://www.energean.com/media/5879/20240930-enearth-%CE%BC%CE%BF%CE%BD%CF%8C%CE%B4%CF%81%CE%BF%CE%BC%CE%BF%CF%82-%CF%84%CE%BF-ccs-%CE%B3%CE%B9%CE%B1-%CF%84%CE%B9%CF%82-%CE%B2%CE%B9%CE%BF%CE%BC%CE%B7%CF%87%CE%B1%CE%BD%CE%AF%CE%B5%CF%82-final.pdf	https://www.kavalapost.gr/energia-perivallon/323310/nikolas-rigas-i-apothikeysi-co2-ston-prino-kathoristiki-gia-to-mellon-tis-viomichanias-stin-ellada/ https://www.kavalanews.gr/44655-n-rigas-enearth-kathoristiki-mellon-viomihanias-ellada-i-apothikeysi-co2-prino.html https://www.youtube.com/watch?v=k7Sj5wn1fLc
05-08-2024	https://www.energean.com/media/5855/20240805-%CE%BC%CE%B5%CE%BB%CE%AD%CF%84%CE%B5%CF%82-%CE%B3%CE%B9%CE%B1-%CF%84%CE%B7%CE%BD-%CE%B1%CF%8D%CE%BE%CE%B7%CF%83%CE%B7-%CF%84%CE%B7-%CE%B1%CF%80%CE%BF%CE%B8%CE%B7%CE%BA%CE%B5%CF%85%CF%84%CE%B9%CE%BA%CE%AE%CF%82-%CE%B4%CF%85%CE%BD%CE%B1%CE%BC%CE%B9%CE%BA%CF%8C%CF%84%CE%B7%CF%84%CE%B1%CF%82-%CF%84%CE%BF%CF%85-%CF%80%CF%81%CE%AF%CE%BD%CE%BF%CF%85-%CF%83%CE%B5-co2.pdf	https://www.kavalapost.gr/energia-perivallon/321087/energean-dromologoyntai-oi-meletes-gia-tin-ayxisi-tis-dynamikotitas-apothikeysis-co2-ston-prino/ https://www.xronometro.com/dromologountai-oi-meletes-gia-tin-afksisi-tis-dynamikotitas-apothikefsis-co2-ston-prino/ https://www.enanews.gr/dromologountai-oi-meletes-gia-tin-afxisi-tis-dynamikotitas-apothikefsis-co2-ston-prino/
01-07-2024	https://www.energean.com/media/5841/20240701-enearth-%CE%B1%CE%AF%CF%84%CE%B7%CF%83%CE%B7-%CE%B3%CE%B9%CE%B1-%CE%AC%CE%B4%CE%B5%CE%B9%CE%B1-%CE%B1%CF%80%CE%BF%CE%B8%CE%AE%CE%BA%CE%B5%CF%85%CF%83%CE%B7%CF%82.pdf	https://www.kavala-portal.gr/enearth-katatethike-aitisi-adeia-apothik/ https://www.proininews.gr/enearth-katatethike-i-aitisi-gia-adeia-apothikefsis-co2-ston-prino/ https://kavalawebnews.gr/eidiseis/energeia/enearth-katatethike-i-aitisi-gia-adeia-apothikefsis-co2-ston-prino/
05-06-2024	https://www.energean.com/media/5829/20240605-enearth.pdf	https://www.enanews.gr/enearth-apo-tin-energean-gia-enan-kosmo-me-midenikes-ekpobes-co2-stin-kavala-to-proto-pilotiko-ergo-desmefsis-dioxeidiou-tou-anthraka/ https://www.youtube.com/watch?v=V0yYeUVdg8k https://www.xronometro.com/1energeanstin-kavala-to-proto-pilotiko-ergo-desmefsis-diokseidiou-tou-anthraka-enearth-apo-tin-energean-gia-enan-kosmo-me-midenikes-ekpompes-co2/
01-04-2024	https://www.energean.com/media/5777/20240329-prinos-co2-storage-power-gas-forum.pdf	https://www.kavala-portal.gr/energean-se-pliri-anaptyxi-to-project-apothikeysis-co2/ https://www.youtube.com/watch?v=VsqXLpD-x_4 https://www.kavalanews.gr/40972-energean-se-pliri-anaptyxi-project-apothikeysis-co2-prino-provlima-i-grafeiokratia.html

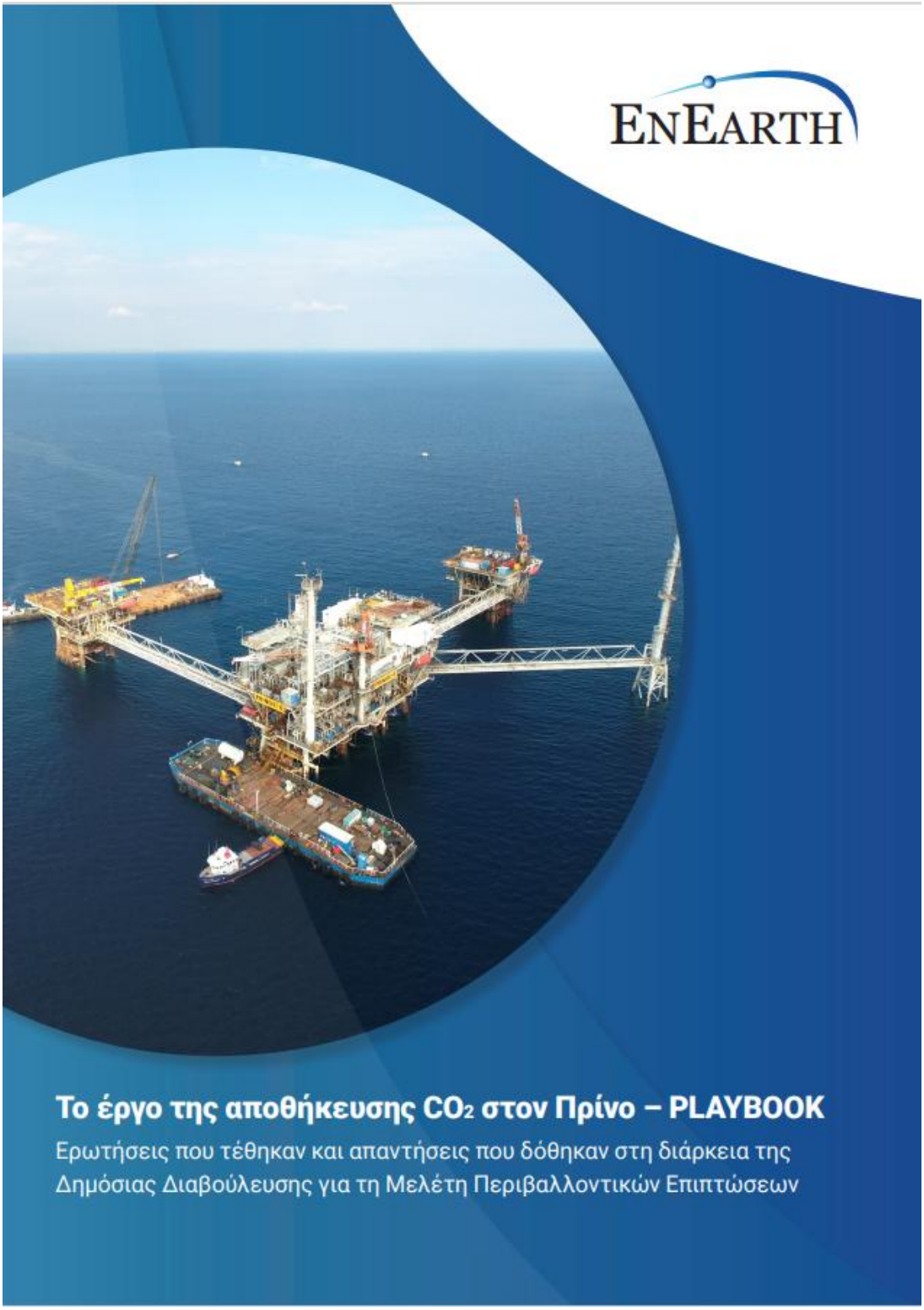
Date	Media Report	Reposting
06-11-2023	https://www.energean.com/media/5573/20231116-%CE%BC%CE%B5%CE%B3%CE%AC%CE%BB%CE%B7-%CE%B1%CF%8D%CE%BE%CE%B7%CF%83%CE%B7-%CF%80%CE%B1%CF%81%CE%B1%CE%B3%CF%89%CE%B3%CE%AE%CF%82-%CE%BA%CE%B1%CE%B9-%CF%80%CF%81%CF%8C%CE%BF%CE%B4%CE%BF%CF%82-%CF%83%CF%84%CE%B7%CE%BD-%CE%B1%CF%80%CE%BF%CE%B8%CE%AE%CE%BA%CE%B5%CF%85%CF%83%CE%B7-co2.pdf	https://www.youtube.com/watch?v=AFg2YyEJeQQ https://www.kavalapost.gr/energia-perivallon/325996/energean-simantiki-anodos-se-paragogi-kai-oikonomika-megethi-kai-meiosi-sto-anthrakiko-tis-apotypoma-sto-9mino-toy-2024/ https://www.proininews.gr/energean-nea-megali-ayxisi-tis-paragogis-kai-proodos-gia-to-project-apothikeysis-co2-ston-prino/
8-03-2022	https://www.energean.com/media/5167/20220328-halliburton-ccs.pdf	https://www.youtube.com/watch?v=35nTlYOK_48 https://www.kavalapoint.gr/i-energean-anethese-stin-halliburton-ti-meleti-ypedafoys-gia-tin-apothikeysi-dioxeidioy-toy-anthraka-ston-prino/ https://www.proininews.gr/i-energean-anethese-sti-halliburton-ti-meleti-ypedafoys-gia-tin-apothikeysi-dioxeidioy-toy-anthraka-ston-prino/

Additional links to articles related to publications in local media are provided in the separate SEP Annex folder

8.2 SAMPLE INFORMATION MATERIALS

Presentation to stakeholders, cover

Playbook (draft) to be distributed to stakeholders (cover)



Links to informative One Pagers in English and Greek uploaded on EnEarth's website and distributed to stakeholders.

Links to videos about the pilot project COREu in English and Greek

Consultation Report on the Project's Environmental Impact Assessment:

CO2 Storage Unit in Prinos

Date:2 Οκτωβρίου 2025

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As part of the Environmental Impact Assessment (EIA) for the project **"CO_2Storage Unit in Prinos" (PET: 2408001614)**, and following the completion of the consultation process in accordance with current legislation, the following Consultation Report has been drawn up.

We note that in this Report we have taken into account and processed all the comments and observations made in writing, which are presented in tabular form together with the corresponding responses.

No	Sender	Ref. No. Incoming	Date sent	Opinion	**Document comments** (the following comments are exact excerpts from the corresponding documents)	LDK comments
1	Rita	HMP	11/02/2025	Positive	Finally, something new and innovative in our city and in our country in general. We should really be proud that such a project is moving forward alongside dozens of other similar projects in much more advanced and environmentally sensitive countries such as Norway, the Netherlands, Denmark, the United Kingdom, Italy, France, etc. I hope it doesn't get bogged down in the interests that stuck the natural gas storage facility and leave us balancing without reserves with everything that is happening around us. Although I do not believe this will happen, as it is a project that industries are eager to see implemented so that they do not have to close down due to the enormous costs of CO2 emission rights. Projects of this kind must be implemented.	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be answered in the context of this Memorandum.
2	CHRISTOS	HIM	13/02/2025	Positive	This project will put our region on the global map of sustainable development. We must consider that this project protects thousands of jobs not only in the Kavala region but also more broadly in the industrial sector, whose plants would be forced to gradually close without carbonisation. Finally, a company (with proven experience in environmental protection) is trying to bring this investment to our region. This is perhaps the largest investment in Eastern Macedonia in the last 30 years. This comment is the author's position in favour of the project's implementation.	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be addressed in this Memorandum.
3	Alex	HIM	13/02/2025	Neutral/Unclear	If I were a regional governor, mayor or member of parliament, I would publicly ask the fertiliser companies to get involved in the project and donate their carbon dioxide for storage. It would clear the area of smoke... OK, cement and oil companies, but let's also see environmental benefits in Chalkero and N. Karvali.	This comment is the opinion of the author and does not relate to the content or scope of the EIA. Therefore, it cannot be addressed in this Memorandum. In any case, it should be noted that access is open to any interested company, provided that the latter chooses/decides to develop/install the technologies and infrastructure needed to capture carbon dioxide at its plant.
4	Alexandros	HPM	13/02/2025	Positive	A CO_2storage facility in Kavala: An investment for the future! This is not just an environmental initiative, but an opportunity for growth and progress. Carbon dioxide storage will contribute significantly to reducing greenhouse gases, protecting the environment and our health. It is a safe and technologically advanced solution. The plant will operate to high safety standards, ensuring the protection of the environment and the health of residents. Innovation: Investing in a technologically advanced solution to tackle climate change. At the same time, the creation of the plant will also mean the creation of new, highly skilled jobs in Kavala, boosting the local economy and attracting new investment. It will offer employment opportunities to engineers, technicians, scientists and other specialists, boosting the region's development. Let us embrace this initiative for a better future for Kavala and future generations. Let us act now for a greener tomorrow!	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
5	Viki	HCM	13/02/2025	Positive	I am keeping a close eye on the project and staying informed, and I believe that there will be some open briefings – although with the conspiracy theorists among us, you can hear anything. But what impresses me most is how detailed the environmental impact study is. At around 1,000 pages, it demonstrates excellent knowledge of the wider area. Secondly, it touches on the last issue that could concern public opinion in a large-scale project. In fact, if I have not miscounted, although any possible impacts from the operation of the project are characterised as fully compatible and immediately remediable, I found about fifty preventive measures to avoid them and about a hundred interventions to deal with them. This is perfectly logical when the project is run by a company that produces hydrocarbons and whose primary concern is safety.	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be addressed in this Memorandum.
6	Vasilis	HIM	15/02/2025	Neutral / Positive	The main characteristics that make the Prinos basin suitable for carbon dioxideCO_2 storage include: Defined rock porosity that ensures sufficient storage capacity for carbon dioxide CO_2. Defined permeability, which indicates that the rock pores are connected, allowing carbon dioxide $CO_{(2)}$to be injected at a good rate and diffused into the formation. A proven seal cap over the reservoir that prevents carbon dioxide leakage. $CO_{(2)}$ Significant reservoir volume for carbon dioxide $CO_{(2)}$ storage,with sufficient thickness and area to create a large storage volume. Reservoir depth: Carbon dioxide $CO_{(2)}$ must be stored as a supercritical liquid at a depth of more than 800 m below the earth's surface. The carbon dioxide $CO_{(2)}$ storage area in the Prinos basin is located at a depth of more than 2 km. Existence of hypersaline aquifers below and above the oil zones within the Prinos basin. The Prinos basin is tectonically stable, as required for carbon dioxide CO_2 storage areas in terms of seismic activity. The Prinos structure already contains carbon dioxide CO_2 dissolved in the oil of the deposit for millions of years, on a geological time scale	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be addressed in this Memorandum.

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7	THASOS ISLAND ENVIRONMENTAL ASSOCIATION	HEM	15/02/2025	Neutral/Unclear	ISLAND ENVIRONMENTAL ASSOCIATION OF THASOS We request: A. Publication of the full, unabridged decision in accordance with the law. B. Extension of the consultation period for the legal period from the posting of the full and unabridged decision. Thank you	It is not clear which decision this comment refers to. In the case of the EIA for the project under evaluation, it should be noted that it has been drafted (and published for consultation) on the basis of all the requirements of national and Community legislation, as well as the specifications and standards of international industry and international financial institutions, as described in detail in **Chapter "5** PROJECT COMPATIBILITY WITH THE APPLICABLE INSTITUTIONAL PROVISIONS OF THE AREA" of the EIA. The issue of extending the consultation period is not within the scope or competence of the EIA. However, it should be noted that during the public consultation process of the EIA in the Electronic Environmental Registry (https://eprm.ypen.gr/), the deadlines and time intervals provided for by the relevant legislation were applied More specifically, the Environmental Impact Assessment (EIA) for the project "*CO_2storage facility in* Prinos" was duly forwarded by the Environmental Licensing Directorate (DIPA) on 23December 2024 for publication and consultation to **the Regional Council of Eastern Macedonia - Thrace** and **other public bodies and services,** for publication in the context of the start **of the consultation and public information process,** while at the same time the EIA has been made available (open access) in the Electronic Environmental Registry (EER) (this public consultation was completed on 25 February 2025). Furthermore, the President of the Regional Council, in a letter dated 14 January 2025, sent a notice to the website of the Region of Eastern Macedonia and Thrace (https://www.pamt h.gov.gr/m-p-e-toy-ergoy-monada-apothikeysis-co2-ston-prino/) and invited the interested public to take note and submit written comments in the context of the launch of the public consultation on the content of the EIA file for the project "$CO_{(2)}$storage unit in Prinos" by 14 February 2025. The above actions and measures show that the applicable procedure and actions required to inform the local community and allow it to express its views have been followed.
8	THEOFILOS	HIM	15/02/2025	Positive	Old hydrocarbon reservoirs are initially considered suitable sites for CO_2 storage, as these geological formations have proven storage capacity, their cap rock prevents leakage, they have suitable porosity for CO_2 storage and are located in tectonically stable areas. Thus, the Prinos basin is also considered suitable for CO_2 storage,as it will only have positive effects on the environment!	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
9	Tilemaxos	HEM	16/02/2025	Negative	Leader of the Opposition KALAFATIS TELEMACHOS "NEW BEGINNING for Thasos". We disagree with this project because it involves uncertainty without guarantees, and no such project has ever been carried out within 4 miles of the beaches. The area is prone to earthquakes, as yesterday we had earthquakes opposite Mount Athos measuring 5 on the Richter scale.	This comment is the author's position **against the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum. For the issue of the project's distance from the coast, please refer to **Comment 32.11**. For the issue of seismicity in the project area from the coast, please refer to **Comment 19.2**.
10	Yannis	HPM	16/02/2025	Negative	This is a project that will degrade the area, turning it into the rubbish dump of the Mediterranean. Located 4.5 miles from the island of Thasos and 7.5 miles from Kavala, this project is not a development project as it is presented, but rather a project for the transport and management of industrial waste. It is a project with many risks of causing a major accident, as the watertightness of the storage facility is not guaranteed and the area is prone to earthquakes (we saw this yesterday, 15/A leak in the marine area will destroy the fishing industry, which is an important source of income for the region. A leak into the air creates a toxic cloud with many environmental consequences for the region. We already have fertilisers in the region that pollute uncontrollablyand uncontrolled, significantly affecting tourism in the area. In an area where the inhabitants make their living from tourism and fishing, it will destroy the economy of the inhabitants, not the opposite. I am totally opposed to this project in the wider area of Thasos and Kavala	This comment is inaccurate in stating that the project concerns the transport and management of waste (and even more so 'industrial waste' as mentioned in the comment), as CO_2 is not waste, but a product of all fossil fuel combustion (coal, oil, petrol, natural gas, etc.), but also of wood, plastics and other organic compounds, as well as from a number of natural processes (decomposition of organic substances, volcanic activity, dissolution of carbonate rocks). It is also produced during the respiration of all plants and animals and by fungi and microorganisms that depend directly or indirectly on plants for their food. Finally, $CO_{(2)}$is not only found throughout the natural environment, but also in popular commercial products. $CO_2$is not a waste product but a greenhouse gas, i.e. it contributes to the retention of solar radiation in the atmosphere, resulting in an increase in temperature. However, this property does not make it a waste product. The greenhouse gases with the highest concentration in the atmosphere are pure water ($H_{(2)}$ o) and SF6 (sulphur hexafluoride), a colourless, odourless, non-toxic and very stable gas with excellent insulating properties, which is used in particular in high-voltage power management equipment (such as circuit breakers, transformers, circuit breakers). Consequently, AtMs cannot be defined as 'waste'. In fact, it is important to note that the CO_2 to be stored under the proposed project must meet specific requirements as set out in the relevant EU Directives (for example, DIRECTIVE 2009/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC and 2008/1/EC, and Regulation (EC) No 1013/2006) and Quality Standards (indicatively ISO 27913:2024 'Carbon dioxide capture, transportation and geological storage — Pipeline transportation systems'). According to EU Directive 2009/31/EC, the CO_2stream consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies that emit carbon dioxide and the company that receives it for storage to ensure that this requirement is met. The study and assessment of the potential risks of the construction and operation of the project, the injection of CO_2into the ground and proof of the integrity of the CO(2) storage facilities are included in the studies prepared

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						and submitted to the competent state agency (EDEYEP) as part of the "Application for CO(2) Storage in the Prinos Reservoir. The findings and conclusions of these technical studies and simulations, concerning the potential risks of CO(2)injection into the ground and proof of the integrity of the CO(2)storage facilities,are included in the project's EIA. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. Based on the documentation in this section and in accordance with the risk studies and simulations carried out in the context of the proposed project, it is estimated that the toxic effects of CO_2 that could potentially cause adverse H&S impacts in the event of a serious project-related accident or disaster extend to: • ~780 m from the CO_2 receiving point of the onshore pipeline (or approximately 300-350 m from the boundaries of the Sigma industrial facility), in areas that include neighbouring crops, the adjacent fish farm and the pier, but will not reach residential areas or public facilities. • ~1,000 m in the area above sea level and a few metres into the sea from the point of the underwater CO_2transport pipeline that may rupture or from the location of the offshore facilities. It is therefore clear that even in the unlikely event of a serious accident, any impact would be limited to the facility area and would not affect residential areas and human activities. Furthermore, according to data collected by Energean over a number of years, it has been proven that depleted hydrocarbon fields and related structures have proven storage capacity, a proven impermeable cap to prevent potential leakage of stored fluids, a defined volume of resources suitable for CO(2)storage,and are tectonically stable areas. Furthermore, it should be noted that the Prinos basin is a tectonically stable area, as required for CO(2)storage areas in terms of tectonic (seismic) activity. Therefore, the scenario of CO(2)leakage from the reservoir itself during the operation of the Project is unlikely. As for a possible leak from the pipeline, this can be prevented by the planned inspection of the pipeline using a smart tool (pigging), which measures the thickness of the pipeline wall (every 5 years or in other cases of system shutdown) and by the planned monitoring system. **In particular, it is recommended that the company proceed with the specification of the CO(2)leak monitoring programme,in accordance with its obligations, to ensure that any leaks that may occur can be immediately detected and addressed.** For the issue of seismicity in the project area off the coast, please refer to **Comment 19.2**. For the issue of the potential impact of the project on tourism and fishing, please refer to **Comment 19.12**.
11	VASILIS	HMP	17/02/2025	Positive / Unclear	With a question from the new left-wing MPs in Parliament against the project, the masks came off. The Turks have set their sights on Prinos as they prepare their own project in eastern Thrace and tell you that we are right next door, so why come to Prinos when Hercules and Titan are right next door... Not to mention that the cement companies and every businessman have nothing to lose. If a country like Greece, with strict European climate regulations, cannot function, they have nothing to lose by going elsewhere, and Turkey is right next door, gentlemen. Let those who react, at least those who are not motivated by expediency, wake up and think. Finally, and most importantly, as confirmed by the relevant scientists, the CO(2)will be stored at a depth of 3 km in a geological structure that has not leaked anything for millions of years. What more do we want? I wonder...	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum.
12	Charalambos	HPM	17/02/2025	Neutral / Positive	There is no greater mistake than what some Thassians say and the fuss they make that this project will destroy the sea and the environment. It's a huge blunder! If there is, say, an island that competes with Thassos, it could campaign on exactly that: (Don't go there, they themselves say they have problems with their sea). Have they been saying something about oil for years? If oil leaks and escapes, the problems will indeed be significant. Did the platforms prevent them from doing anything? Why are they now making such a fuss that could harm their own product? Could there be other interests behind this that prefer Thasos as something different rather than a tourist destination?	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be answered in the context of this Memorandum.
13	APOSTOLIA	HCM	17/02/2025	Neutral / Positive	I will speak a little technically, but I will try to simplify it, because some things that are being said are not correct: The critical temperature of carbon dioxide is 31 °C. This means that it easily liquefies at normal ambient temperatures. The liquefaction of carbon dioxide is only accelerated naturally as a result of an increase in its pressure (by compression to 7 MPa at ambient temperature). Also, by adding oxygen to the combustion process, the exhaust gases produced are compressed and cooled under suitable pressure and temperature conditions, allowing the carbon dioxide to liquefy, while the other components of the exhaust gases remain in a gaseous state, as they have a different	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum.

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					critical temperature. The addition of chemicals (such as amines) is NOT REQUIRED to separate the carbon dioxide, as the process is cryogenic and not catalytic adsorption. The liquid carbon dioxide produced has a purity of over 99.8%. Therefore, what will be stored in the underground tank will be pure $CO_{(2)}$ .Nothing else. It is slightly soluble in water, so it will not remain in the water at all times. It will escape into the atmosphere. Locally.	
14	BASILIA	HMP	17/02/2025	Neutral/Unclear	The decision of the Minister of National Economy and Finance dated 23/12 24, with ref. no. 195829, on the inclusion of the CO_2storage project in Prinos with European funding, which was posted on the internet, is incomplete (!). Specifically, on page 6, where the milestones and objectives of the project are described, item no. 52 is missing and item no. 51. Consultation is not possible without the publication of the complete file without omissions, so an extension of the consultation period is obviously required. We request a. The publication of the complete decision, without omissions, in accordance with the law b. An extension of the consultation period for the legal period from the publication of the complete decision, without omissions	The decision of 23 December 2024 (AP 195829) of the Minister of National Economy and Finance states: *"Based on the Executive Decision of 13 July 2021 [.....] and the Executive Decision of the Council of the European Union of 9 July 2024 approving the targeted revision of the ESRF for Greece (ST 11858/24, ADD 1)".* In other words, the decision of the Minister of National Economy is based on Executive Decision ST 11858/24, ADD 1 of the Council of Europe. This executive decision (ST 11858/24, ADD 1) is publicly available at https://greece20.gov.gr/wp-content/uploads/2024/07/st11858-ad01.el24.pdf. The Actions and milestones relating to **CO_2storage,** as contained in the relevant EU Council Implementing Decisions, are **numbered 51 and 53**. Action 52 concerns the electrification of buses and taxis and has no connection with $CO_{(2)}$storage. The omission of the last sentence of point 51 is probably due to a typographical error in the publication of the decision and the missing part reads *'returned for permanent storage*'. The full wording of this last sentence in the EU implementing decision is *'The $CO_{(2)}$ with any oil or gas that may be extracted shall be separated and fed back for permanent storage'*, i.e. *"$CO_{(2)}$,together with any oil or natural gas that may be extracted, shall be separated and fed back for permanent storage".* From the above, it is clear that, on the one hand, the omission of Action No. 52 in the decision of 23 December 2024 (AP 195829) of the Minister of National Economy and Finance is in no way related to the project under consideration, nor does the deletion of the last sentence of item 51, which has no impact on the project, the EIA under evaluation and the evaluation and approval process. Therefore, there is no question of extending the consultation period for the EIA. Furthermore, it should be noted that during the public consultation process for the EIA in the Electronic Environmental Registry (https://eprm.ypen.gr/), the deadlines and time intervals provided for in the relevant legislation were applied More specifically, the Environmental Impact Assessment (EIA) for the project "CO^2storage facility in Prinos" was duly forwarded by the Environmental Licensing Directorate (DIPA) on 23December 2024 for publication and consultation to the Regional Council of Eastern Macedonia - Thrace and other public bodies and services, for publication in the context of the start of the consultation and public information process, while at the same time the EIA has been made available (open access) in the Electronic Environmental Registry (EER) (this public consultation was completed on 25.02.2025). Furthermore, the President of the Regional Council, in a letter dated 14 January 2025, sent a notice to the website of the Region of Eastern Macedonia and Thrace (https://www.pamt h.gov.gr/m-p-e-toy-ergoy-monada-apothikeysis-co2-ston-prino/) and invited the interested public to take note and submit written comments in the context of the launch of the public consultation on the content of the EIA file for the project "$CO_{(2)}$storage unit in Prinos" by 14 February 2025. The above actions and measures show that the applicable procedure and actions required to inform the local community and allow it to express its views have been followed.
15	Anastasios	H.P.M.	17/02/2025	Neutral / Positive	To "VASILIA": Don't talk nonsense, and don't repeat what people who can't read (even though they claim to be university professors) tell you! Decision AP 195829 of the Minister of National Economy and Finance explicitly states (before the tables with the milestones, on page 5) that: "Based on the Executive Decision of 13 July 2021 [.....] and the Executive Decision of the Council of the European Union of 9 July 2024, approving the targeted revision of the ESRF for Greece (ST 11858/24, ADD 1)" In simple terms, the decision of the Minister of National Economy is based on Executive Decision ST 11858/24, ADD 1 of the Council of Europe... which you obviously haven't read (and unfortunately neither have those who "discovered" the "omission")! The executive decision in question (ST 11858/24, ADD 1) can be found at https://greece20.gov.gr/wp-content/uploads/2024/07/st11858-ad01.el24.pdf Here you can see (if you go to pages 40 to 42) that serial numbers 51 and 53 relate to "Carbon storage and sequestration — issue of operating certificate", but serial number 52 relates to the project "Buses and taxis — replacement with electric vehicles"!!! This executive decision, for those who have not understood, concerns MANY projects! The decision of the Minister of Finance concerns ONLY ONE of the MANY projects described in the executive decision, and only the milestones related to the CO2 project have been included in it — unless you want them to include the milestone for buses and taxis as well, so that you are satisfied!!! Thank you!!!	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum.

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16	THANOS	HPM	18/02/2025	Positive	It is clear from the extensive environmental impact study that this large investment will not have any adverse effects on the sustainability of the tourism sector and, consequently, on the communities in the region that depend on this sector. Even in the unlikely event of a carbon dioxide $_{CO_2}$ leak, the impact would be limited to a very small area within the facilities and would dissipate within that area. In other words, it would not affect the beaches and residential areas of the Gulf of Kavala, as the carbon dioxide would dissipate and dissolve.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
17	MARIA	HIM	18/02/2025	Neutral / Positive	As a resident of Kavala, three things concern me. Firstly, that the factory in Prinos continues to operate, providing jobs for the local population. Secondly, that the natural gas pipeline, which causes significant visual pollution, is removed from the beach at some point. Thirdly, and most importantly, emissions from fertilisers should be stored so that we can all breathe. These are the things we should be fighting for, rather than witch-hunting like some others...	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be addressed in this Memorandum.
18	Evangelia	HPM	18/02/2025	Neutral/Unclear	The decision of the Minister of National Economy and Finance dated 23/12 24, with ref. no. 195829, on the inclusion of the CO_2storage project in Prinos with European funding, which was posted on the internet, is incomplete (!). Specifically, on page 6, where the milestones and objectives of the project are described, item no. 52 is missing and item no. 51. Consultation is not possible without the publication of the complete file without omissions, so an extension of the consultation period is obviously required. We request a. The publication of the complete decision, without omissions, in accordance with the law b. An extension of the consultation period for the legal period from the publication of the complete decision, without omissions	For the answer to this specific issue, please refer to **Comment 14.**
19.1	MARIA	HIM	18/02/2025	Negative	- This is not a development project as presented, but a project for the transport and management of industrial waste, which will turn the area into a landfill site for Europe. - It is a project that could cause a large-scale industrial accident because: a. The impermeability of the storage facility is not guaranteed.	As mentioned above, this comment is inaccurate in stating that the project concerns the transport and management of waste (and even more so 'industrial waste' as mentioned in this comment), as CO_2 is not waste, but a product of all fossil fuel combustion (coal, oil, petrol, natural gas, etc.), but also of wood, plastics and other organic compounds, as well as from a number of natural processes (decomposition of organic substances, volcanic activity, dissolution of carbonate rocks). It is also produced during the respiration of all plants and animals and by fungi and microorganisms that depend directly or indirectly on plants for their food. Finally, $CO_{(2)}$is not only found throughout the natural environment, but also in popular commercial products. $CO_2$is not a waste product but a greenhouse gas, meaning that it contributes to the retention of solar radiation within the atmosphere, resulting in an increase in temperature. However, this property does not make it a waste product. The greenhouse gases with the highest concentration in the atmosphere are pure water ($H_{(2)}$ $_{0}$) and SF6 (sulphur hexafluoride), a colourless, odourless, non-toxic and very stable gas with excellent insulating properties, which is used in particular in high-voltage power management equipment (such as circuit breakers, transformers, circuit breakers). Consequently, AtMs cannot be defined as ' ' waste.In fact, it is important to note that the CO2 to be stored under the proposed project must meet specific requirements as set out in the relevant EU Directives (for example, DIRECTIVE 2009/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC and 2008/1/EC, and Regulation (EC) No 1013/2006) and Quality Standards (indicatively ISO 27913:2024 'Carbon dioxide capture, transportation and geological storage — Pipeline transportation systems'). According to EU Directive 2009/31/EC, the CO2 stream consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies that emit carbon dioxide and the company that receives it for storage to ensure this requirement is met. The study and assessment of the potential risks of CO2 injection into the ground and proof of the integrity of the CO2 storage facilities are included in the studies prepared and submitted to the competent state body (EDEYEP) as part of the "Application for CO2 Storage in the Prinos Reservoir." The findings and conclusions of these technical studies and simulations, concerning the potential risks of CO2 injection into the ground and the proof of the integrity of the CO2 storage facilities, are included in the project's EIA. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT' of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. As already emphasised, even in the unlikely event of a serious accident, any impacts

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						would be limited to the site of the facilities and would not affect residential areas and human activities in the region.
19.2	MARIA	HMP	18/02/2025	Negative	b. The area is prone to earthquakes, as has been clearly demonstrated in recent days.	The seismicity of the area under study has been thoroughly examined in the study entitled ***"Seismotectonic Investigation of the Kavala Area - Geometry and Kinematics of Active Structures based on Seismological, Geological and Geodetic Data"*** conducted by the **Geodynamic Institute of the National Observatory of Athens**. According to the seismotectonic investigation of the Kavala-Prinos area by the Geodynamic Institute, National Observatory of Athens (NOA), there are five (5) active faults. Based on the available data on the most significant seismic events recorded in the wider area, within a radius of approximately 50 km (or more) from the Project under study during the years 2016-2023, the closest earthquake to the activity under study occurred on 08/12/2017 with an epicentre 28.3 m northwest of Serres and a magnitude of 3.8 on the Richter scale. In summary, the above study examined the historical and instrumental seismicity of the Prinos basin and the surrounding areas (Orfanos basin, Thasos, wider Kavala area). According to the study's conclusions, the Prinos basin, in relation to its surrounding areas (Northern Aegean, Chalkidiki, etc.), is characterised by **reduced seismicity.**
19.3	MARIA	HPM	18/02/2025	Negative	c. No one can guarantee how the storage site will react to CO_2compression (the argument that it is safe because it was previously used for mining is refuted).	Through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos deposit", the historical development of the reservoir pressure is presented in detail. These studies also calculate the future change in pressure due to the injected quantities of carbon dioxide, as well as the safe limit above which cracks may open. Consequently, the behaviour of the reservoir in response to pressure changes that could lead to induced microseismicity has been thoroughly studied and the safe limit has been taken into account in the project design. Furthermore, it is unclear to the authors of this Memorandum what the author of the comment means by the statement *"the argument that it is safe because there has been mining activity is refuted"*. The above is not part of the project's EIA argumentation. However, the EIA states that the P&K characteristics of the study area are well known to the project operator (and the respective researchers) due to its long-term activity in the area as a result of mining activities, which has facilitated both the proper design of the project and a more accurate assessment of the relevant potential P&K impacts.
19.4	MARIA	HMP	18/02/2025	Negative	d. Not all safety guarantees for operation and potential accidents are met.	It is unclear what the author of the comment means by the statement *"Not all safety guarantees for operation and potential accidents are met"*. The comment does not mention what the safety guarantees for operation and potential accidents are, where they come from and why they are not met. It should be noted that with regard to safety and environmental issues, in the 17 years that Energean has been managing the Prinos deposits, and even before that, there has not been a single incident with serious consequences for people or the environment. The fire at the facilities on 9 April was extinguished within a few hours thanks to the immediate intervention of the company's firefighting team and the fire brigade, without causing any injuries or environmental damage, clear evidence of the excellent functioning of Energean's **Emergency Response Plan**. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure.
19.5	MARIA	EIA	18/02/2025	Negative	e. Accident at sea: CO_2leakage will make the water more acidic, with unpredictable consequences for the marine environment and, of course, for fishing.	The possibility of a CO_2leak and the potential **acidification of seawater** has been thoroughly examined in the project's EIA. More specifically, the potential impacts of seawater acidification have been examined: • As part of the assessment of the potential impacts arising from the vulnerability of the project under study to **the risk of serious accidents or disasters** (**Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'**). The potential P&C from seawater acidification are examined for all P&C parameters in the study area (indicatively **Sections 10.4.5.5 Impact on the Aquatic Environment, 10.4.5.8 Impact on the Biotic Environment,** etc.). • As part of **the Sensitivity, Exposure and Vulnerability to Climate Change analysis** (**Section '10.5** IMPACTS FROM EXPECTED CLIMATE RISKS'). **It is also recommended that the company proceed with the specification of the CO_2leakage monitoring programme, in accordance with its obligations, to ensure that any leakage that may occur can be immediately detected and addressed.** Furthermore, the potential P&K from seawater acidification are examined in detail in the Special Ecological Assessment Study (SEAS), which forms an integral part of the project's EIA. This analysis, both in the context of the EIA and the SEA of the project, shows that no significant adverse effects are expected in the event of seawater acidification (an event that is extremely unlikely to occur and would have a limited spread if it did occur). Furthermore, under no circumstances are 'unpredictable consequences for the marine environment and, of course, for fishing' to be expected, as claimed by the author of this comment.

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19.6	MARIA	HIM	18/02/2025	Negative	f. An accident in the air means that the CO_2cloud can have fatal consequences	The study and assessment of the potential risks of the construction and operation of the project, the injection of CO_2 into the ground and the proof of the integrity of the CO_2 storage facilities are included in the studies prepared and submitted to the competent state body (EDEYEP) as part of the "Application for CO_2 storage in the Prinos reservoir". The findings and conclusions of these technical studies and simulations, concerning the potential risks of $CO_{(2)}$injection into the ground and proof of the integrity of the $CO_{(2)}$storage facilities,are included in the project's EIA. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. Based on the documentation in this section and in accordance with the risk studies and simulations carried out in the context of the proposed project, it is estimated that the toxic effects of CO_2 that could potentially cause adverse H&S impacts in the event of a serious accident related to the project or disaster extend to: • ~780 m from the CO_2 receiving point of the onshore pipeline (or approximately 300-350 m from the boundaries of the Sigma industrial facility), in areas that include neighbouring crops, the adjacent fish farm and the pier, but will not reach residential areas or public facilities. • ~1000 m in the area above sea level and a few metres into the sea from the point of the underwater CO^2transport pipeline that may rupture or from the location of the offshore facilities. It is therefore clear that even in the unlikely event of a serious accident, any impact would be limited to the facility area and would not affect residential areas and human activities in the region. Furthermore, according to data collected by Energean over a number of years, it has been proven that depleted hydrocarbon fields and related structures have proven storage capacity, a proven impermeable cap to prevent potential leakage of stored fluids , a defined volume of resources suitable for $CO_{(2)}$storage,and are tectonically stable areas. Furthermore, it should be noted that the Prinos basin is a tectonically stable area, as required for $CO_{(2)}$storage areas in terms of tectonic (seismic) activity. Therefore, the scenario of $CO_{(2)}$leakage from the reservoir itself during the operation of the Project is unlikely. As for a possible leak from the pipeline, this can be prevented by the planned inspection of the pipeline using a smart tool (pigging), which measures the thickness of the pipeline wall (every 5 years or in other cases of system shutdown) and by the planned monitoring system. **In particular, it is recommended that the company proceed with the specification of the CO_2leak monitoring programme, in accordance with its obligations, to ensure that any leaks that may occur can be immediately detected and addressed.** Based on an Impact Modelling study to assess the risks associated with CO_2leakage from CO_2 storage facilities in Prinos (as mentioned above), it was found that the maximum risk distance for **1% mortality in the terrestrial environment** is estimated to be 782 m, which could result from a large leak from the CO_2 pipeline. These results show that land leaks cannot affect settlements, individual residences outside the project area or other public facilities. They concern risks to human resources employed during the operational phase of the Project, which, however, are adequately prepared to take immediate measures in case of emergencies (e.g. gas supply interruption). With regard to offshore facilities, the results show that the risk distances from the specified mortality levels are limited to the immediate vicinity of the Beta platform. The maximum risk distance for 1% mortality is estimated to be 80 m at the deck level of the Beta platform, resulting from a leak due to a rupture in the $CO_{(2)}$pipeline (scenario FC04). However, only the aforementioned FC04 rupture scenario can affect the adjacent Delta platform at the altitude of its decks. Since CO_2 is heavier than air, a leak at an altitude above the surface moves towards sea level and an underwater leak remains close to the surface and disperses, creating a potential hazard for support vessels. At sea level, the maximum distance in the direction of the wind where the concentration is equivalent to a 1% mortality level is approximately 1 km for the subsea pipeline rupture scenario (FC08). In the early stages of the spill (t = <60 s), a high plume is predicted that may exceed the deck levels of the platform for a short period of time, but the distances in the wind direction at these heights are limited. As the pipeline decompresses, the plume height decreases significantly and disperses over significant distances in the wind direction. The height of the dispersion plume is less than 2 m above sea level for distances in the direction of the wind greater than ~100 m, which means that the risk to ship personnel is reduced in these scenarios. However, with the implementation of preventive measures (e.g. pipeline inspection), this scenario becomes extremely rare. It follows from the above that both the probabilities and the geographical spread of potential impacts with fatalities are relatively limited and in most cases smaller than those that may occur in the event of accidents in normal industrial structures and facilities. **In the context of monitoring and early warning, it is recommended that the company proceed with the specification of the CO_2 , in accordance with its obligations, to ensure that any leaks that may occur can be immediately detected and addressed.**

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19.7	MARIA	HPM	18/02/2025	Negative	g. No one can guarantee that CO_2will be properly separated from the highly toxic compounds in industrial pollutants and that these will not also be transferred to Prinos.	It is important to note that the CO_2 to be stored under the proposed project must meet specific requirements as set out in the relevant EU Directives (for example, DIRECTIVE 2009/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 2[3] April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC and 2008/1/EC, and Regulation (EC) No 1013/2006) and Quality Standards (indicatively ISO 27913:2024 'Carbon dioxide capture, transportation and geological storage — Pipeline transportation systems'). According to EU Directive 2009/31/EC, the CO_2stream consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies that emit carbon dioxide and the company that receives it for storage to ensure that this requirement is met. It is therefore ensured that the $CO_2$to be stored under the proposed project will not contain *'extremely toxic compounds of industrial pollutants'*, which *'will not be transferred to Prinos either'.*
19.8	MARIA	HMP	18/02/2025	Negative	Many similar projects have been discontinued during construction due to unforeseen costs, but since they have already caused damage to the environment/	Cases where *'similar projects have been halted during construction due to unforeseen* costs' are not known and are not mentioned by the author of the comment. Therefore, it is not possible to respond to this comment in the context of this Memorandum. It is worth noting that there are currently more than 50 carbon dioxide storage projects in operation worldwide, with over 600 under development. However, it should be noted that any project (even one that has been granted an environmental permit) may be abandoned during the construction phase (for a wide range of reasons) after having already caused adverse environmental impacts. For this reason, the EIA under evaluation includes all provisions for the actions required in the event of decommissioning -Cessation of Project Operation (for this phase, a detailed assessment of potential P&C Impacts has been carried out in **Chapter 10** of the EIA).
19.9	MARIA	EIA	18/02/2025	Negative	Furthermore, there is no guarantee that after the transfer of pollutants, the contractors will continue to operate the project. Literally, the island and the opposite area are becoming hostages to unknown forces. A time bomb is being planted in the area. Recent criminal negligence in many of our country's infrastructures makes the project even more uncertain in terms of compliance with the necessary safety conditions.	It is unclear what the author of the comment means by the statement *"there is no guarantee that after the transfer of pollutants, contractors will continue to operate the project*". The operating conditions of the project are clearly defined by the existing national and EU legal framework, as are the obligations of the project operator after the end of the $CO_{(2)}$storage process.At the end of a CCS project's operation, the **operator** is responsible for monitoring, taking preventive and corrective measures, and sealing the storage site. The transfer of responsibility to the competent authority is only possible under specific conditions that ensure that the stored carbon dioxide remains completely and permanently isolated (see EU Directive 2009/31/EC, Articles 18, 19 and 20). The entire project (not just the drilling) is monitored during operation, at closure and after closure. There are clear European laws, regulations, and obligations (see EU Directive 2009/31/EC on the underground storage of $_{CO_2)}$. A strict measurement-monitoring-verification (MMV) plan is implemented from the start of operation until closure and beyond. In accordance with existing EU and national legislation, the risk, i.e. the liability, of an 'accident' (whatever this general term may include) is borne both during the operation of the facility (i.e. for up to 25 years initially, years, but also for any extension, if the capacity of the storage site allows it) and for a period of 20 years after the closure of the facility. After 20 years have elapsed since closure and provided that all available data indicate that the stored CO_2 will be kept completely and permanently isolated (Article 18 of the relevant Directive 2009/31 of the European Parliament and Article 19 of the existing national legislation), the storage facility shall be handed over to **the competent authority (the Greek State)**. Furthermore, it should be noted that under no circumstances does the operator consist of 'unknown persons', as claimed in the comment, since it is a legal company with official institutional representation, shareholder structure and procedures that are subject to the relevant procedures of the national and EU legal framework. Finally, it is not clear what the author of the comment means by the statement "Recent criminal oversights in many of our country's infrastructures make the project even more uncertain in terms of compliance with the necessary safety conditions." In other words, according to the logic of the comment, all airports, ports and other sensitive infrastructure in the country should be closed due to "recent criminal oversights in many of the country's infrastructure", which is obviously neither useful nor realistic. Overall, based on the available data and studies, there is no direct link between these claims and the specific project, which incorporates the necessary safety measures to protect infrastructure and the environment.
19.10	MARIA	HPP	18/02/2025	Negative	The project is not as environmentally "green" as it is presented. On the contrary: Environmental sciences and the ecological movement consider it unacceptable. The CCS method cannot contribute positively to tackling the climate crisis as it does not address the quantities of CO_2 but indirectly supports the continuation of its emission. (The scientific community recommends the DAC method). It is no coincidence that the largest CCS projects on the planet have failed.	The comments' assertions that "*Environmental sciences and the ecological movement consider it (the CCS project)* unacceptable" and that "The scientific community recommends the DAC method" are not correct. By way of illustration, the following excerpts from the revised ESEK (Revised Edition, August 2024) are provided: "...The selection of solutions that are as sustainable as possible in the long term. This requires a strategy that leads to ultimate independence from fossil fuels, as solutions such as maintaining fossil fuels with carbon capture and storage (CCS) (CCS) or carbon capture and storage from the air (DAC) are not sustainable in the long term due to limited storage capacity. Thus, **carbon capture and storage is primarily preferred (and subject to the following point) as a transitional solution for sectors that have no other viable alternative (such as the cement**

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						industry and refineries until alternative products are developed). At the same time, in order to achieve the net zero target in the shortest possible time (just 26 years) and by 2050, the use of carbon dioxide capture from the air (**DAC**) will also be introduced **after 2045.** This is because it is not expected that the available technologies will mature sufficiently within this timeframe to allow for the complete elimination of fossil fuel use (especially in transport). This choice is combined with the reasonable expectation that DAC costs will have come down by then. "...Furthermore, for those industries or industrial processes for which electrification is not a solution, resulting in continued $CO_{(2)\ emissions}$from them, measures are being taken to **promote carbon capture and storage (CCS) technologies.** Greece is already developing the first geological formation for long-term $CO_{(2)}$ storage in the (almost) depleted offshore oil fields in **Prinos, Kavala.** The development of this infrastructure is being supported by a grant from the Recovery and Resilience Fund and it is estimated that, when fully developed, it will allow the injection of up to 3 million tonnes of CO_2per year... "...the development of CCS technologies and their possible expansion into other areas beyond those mentioned above increase the need for more storage space. Indeed, while dozens of new carbon storage facilities are currently being developed in Northern Europe, in the Mediterranean there are few new projects and they are insufficient to cover even a small part of the carbon emissions of industries that cannot mitigate their emissions. For this reason, **Greece is focusing on identifying new geological formations that are considered suitable for permanent $CO_{(2)}$storage**,with the competent Greek authorities, on the one hand, the Hellenic Hydrocarbon Resources Management Company (EDEYP) and the Greek Geological and Mining Research Authority (EAGME) to carry out the relevant research. Given that suitable geological formations are also found in other countries in the region, Greece will propose the reform of the relevant framework at European level so as to allow the development of storage facilities in non-EU countries, while ensuring the necessary safety, environmental protection, monitoring and certification...". Furthermore, it should be noted that the implementation of **Carbon Capture and Storage (CCS)** projects is a technical/regulatory/economic measure with code **"M38 - Decarbonisation of industry through the promotion of carbon capture and storage (CCS) technologies,** with the aim of "Reducing emissions in the industrial sector" of the revised NECP. Finally, it should be noted that the European Parliament has included investments in carbon capture and storage in the EU list of "green" investments, known as **the EU Taxonomy,** while on the other hand it has included the relevant technologies in the Strategic Technologies for Europe Platform (STEP). More specifically, on 1 March 2024, Regulation (EU) 2024/795 of the European Parliament and of the Council establishing the **Strategic Technologies for Europe Platform** (**STRATEGIC TECHNOLOGIES FOR EUROPE PLATFORM - STEP).** To ensure European sovereignty and security of the Union, reduce the Union's strategic dependencies in strategic areas, enhancing the Union's competitiveness by strengthening its resilience and productivity and by mobilising funding, promoting a level playing field for investments in the single market, promoting cross-border participation, including of SMEs, strengthening economic, social and territorial cohesion and solidarity between Member States and regions, and promoting inclusive access to attractive, quality jobs through investment in the skills of the future and measures to make its economic, industrial and technological base fit for the green and digital transitions, STEP shall pursue the following objectives: **(a)** Supporting the development or production in the Union of critical technologies, or securing and strengthening their respective value chains, in the following areas: **(i)** Digital technologies, including those contributing to the aspirations and objectives of the Digital Decade 2030 policy agenda, multi-country projects, as defined in Article 2(2) of Decision (EU) 2022/2481, and innovation in the field of cutting-edge technology; **(ii) Clean and resource-efficient technologies, including zero net emission technologies as defined in the Regulation on the zero net emission industry;.** **(iii)** Biotechnologies, including medicinal products on the Union list of critical medicines and their ingredients;. **(b)** Addressing labour and skills shortages that are critical for all types of quality jobs in support of the above objective, in particular through lifelong learning, education and training projects, including European net-zero industry academies established in accordance with the relevant provision of the Net-Zero Industry Regulation, and in close cooperation with social partners and existing education and training initiatives. In accordance with Article 2(1) of the STEP Regulation, clean and resource-efficient technologies include net-zero emission technologies as defined in Article 4 of **the NZIA**. The **NZIA** Regulation is Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13June 2024, establishing a framework for measures to strengthen Europe's net-zero emission technology ecosystem and amending Regulation (EU) 2018/1724'. Article 4 of **the NZIA,** which presents the **"List of net-zero emission technologies",** also includes **"Carbon capture and storage technologies".**

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						It follows from the above that the comment's assertion that "Environmental sciences and the ecological movement consider it (the CCS project) unacceptable" is in no way valid. **On the contrary, the international scientific community and the relevant institutional authorities evaluate CCS projects as "green investments" using clean and resource-efficient technologies.** It should be noted that, although it is not the subject of this EIA, the project contractor has officially announced that it plans to implement a pilot application of the DAC method at the Nea Karvali land facilities.
19.11	MARIA	HIM	18/02/2025	Negative	In addition, scientists emphasised that this particular project in Prinos raises suspicions of covert mining.	The project under consideration is in no way related to hydrocarbon extraction, as clearly described in the EIA, which states that the project under evaluation is aimed exclusively at CO(2)storage and is not related in any way to hydrocarbon extraction. In the CO_2 injection project in Prinos, there are no plans for simultaneous CO_2 injection/storage and hydrocarbon extraction in the same geological horizon. The only period with possible simultaneous hydrocarbon production and CO(2)injection/storage concerns **different deposits** and refers to the first stage of the project, where CO_2 will be injected and stored in reservoirs B and C, and oil production will take place from reservoir A. The fact that reservoir A continues to produce for some time while CO_2 is injected into B and C does not create any interaction between the two activities, as there is no communication between the different reservoirs. Therefore, **CO_2 injection always takes place in areas where oil production has ceased.**
19.12	MARIA	HMP	18/02/2025	Negative	The location of such a project in the Gulf of Kavala is unacceptable because: a. It conflicts with the character of the area as a protected area oriented towards tourism development, with irreparable consequences for the economic, cultural and social life of the area.	The potential adverse effects on marine and terrestrial animal and plant organisms in the area, on habitats and on institutionally protected areas of ecological interest are examined in detail in **Section '10.2.4 Impacts on the Natural Environment"** of the EIA, as well as in **the MEIA** included in Annex 17.1 of the EIA. More specifically, as the project is located within institutionally protected areas of ecological interest (Natura network areas), a "Special Ecological Assessment Study of the CO_2Storage Unit in Prinos in SPA & SAC GR1150014, SPA GR1150001, SAC GR1150010 and SPA GR1150012 of the Natura 2000 Network" has been drawn up, which forms an integral and inseparable part of the EIA. The SEA analysis took into account all available bibliographic data for the Natura network areas in question, the long-term environmental monitoring data applied by ENERGEAN in the area, and extensive seasonal fieldwork has been carried out by a large multidisciplinary team, as described in the SEA itself. The conclusions of this study indicate that no significant impact is expected on the natural habitat of the study area, and even less so on the protected areas, their species classification and their ecological characteristics. Furthermore, **Chapter 10** of the EIA thoroughly examines and assesses the potential impact of the project on tourism in the area during the construction phase (**Section 10.2.5.4.1.2**), the operational phase (**Section 10.2.5.4.2.2**) and the decommissioning phase (**Section 10.2.5.4.3.2**). The conclusions of this EIA process are summarised as follows: • *In conclusion, during the construction phase, taking into account the results of the environmental impact assessment in this section of the EIA, it is estimated that the proposed Project **will not cause any significant adverse changes** to the sustainability of the tourism sector and, consequently, to the communities in the area that depend on this sector.* • *In conclusion, during the operational phase, taking into account the results of the environmental impact assessment in this section of the EIA, it is estimated that the proposed Project **will not cause any significant adverse changes** to the sustainability of the tourism sector and, consequently, to the communities in the area that depend on this sector.* • *In conclusion, during the decommissioning/cessation of operation phase, taking into account the results of the environmental impact assessment in this section of the EIA, it is estimated that the proposed Project **will not cause any significant adverse changes** to the sustainability of the tourism sector and, consequently, to the communities in the area that depend on this sector.* Finally, it should be noted that tourists still visit Thasos today, despite the fact that hydrocarbon extraction activities are already taking place in the area where the proposed project is planned, mainly from facilities that will also be used for the proposed project (Sigma facility, offshore platforms). Therefore, the operation of the CCS project, which is worth noting as it is characterised by a significantly lower volume of activities compared to extraction activities, does not appear to be a deterrent to tourists.
19.13	MARIA	HUM	18/02/2025	Negative	b. Not provided for or permitted by the General Spatial Plan for the area.	The compatibility of the proposed project with the spatial and urban planning regulations in force in the project area is examined and presented in detail in **Section 5.7** of the EIA. Furthermore, for further details, please refer to **Comments 38.3** and **38.4**.
19.14	MARIA	HMP	18/02/2025	Negative	c. The case of Ravenna, which is used as a model in the case of Prinos, has a different size and design, while its platform is 14 miles away from the Italian coast.	The eligibility and suitability of a CO_2storage site is not determined by its distance from the coast, but by its geological, petrophysical and geomechanical characteristics, its impermeability and its storage capacity. There are CCS projects, such as those operating or under development in Norway, that are more than 100 km from the coast. This distance was not chosen at random, but is due to the fact that there were many depleted hydrocarbon deposits in the area, due to the large-scale production of oil in the North Sea since the 1970s. The

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						abundance of data from their production history provided more reliable and technically proven options for implementing such projects in a short period of time. There are also similar projects in Europe that are much closer to the coast, as well as projects on land, close to residential areas. Indicative projects are mentioned in **Comment 32.11.**
19.15	MARIA	HPM	18/02/2025	Negative	This is in fact a huge profiteering operation, using the climate crisis as a pretext, from which the companies involved will earn huge amounts at the expense of taxpayers and consumers, who will bear the brunt of the increased cost of products. The amounts 'invested' by the recovery fund are enormous, as are those that are being eaten up, while the project may be abandoned by 2028. This money could be invested in essential infrastructure in the local community.	This part of the comment is the author's position **against the implementation of the project** and does not concern the contents of the EIA under evaluation. Therefore, it does not need to be answered in the context of this Memorandum.
19.16	MARIA	HIM	18/02/2025	Negative	The argument regarding the "national interest" of the investment cannot be upheld because: a. Under no circumstances can the transformation of a country into a landfill site be considered to be in the national interest.	This part of the comment is the author's opinion **against the implementation of the project** and does not concern the contents of the EIA under evaluation. Therefore, it does not need to be answered in the context of this Memorandum.
20	Lia	HIM	18/02/2025	Positive	To "Maria" to read... Over the last decade, a series of scientific publications and public documents have recognised the Prinos basin as a CO_2 storage site in Greece, including an HHRM study on CO_2 storage. Indicative publications are listed below: • Underground Geological Storage of CO_2 and Natural Gas in Greece, EDEY, 2020. • Hatziyannis G. Country updates: Greece. In: Vangkilde-Pedersen T, editor. WP2 Report – Storage capacity. EU Geo Capacity – Assessing European Capacity for Geological storage of Carbon Dioxide. Project no. SE6-518318. 2009: p. 144-147. • Koukouzas, N. et al., Energy Procedia 4 (2011) 2978–2983, https://doi.org/10.1016/j.egypro.2011.02.207, “Cost of pipeline-based $CO_{(2)}$transport and geological storage in saline aquifers in Greece”. • Koukouzas, N. et al., Energies 2021, 14(11), 3321; https://doi.org/10.3390/en14113321, “Carbon Capture, Utilisation and Storage as a Defence Tool against Climate Change: Current Developments in West Macedonia (Greece)”. • Koukouzas, N., Lymperopoulos, P., & Tasianas, A. (2016). Safety issues when monitoring $CO_{(2)}$ storage in the Prinos area, Greece. Bulletin of the Geological Society of Greece, 50(4), 2304–2313. https://doi.org/10.12681/bgsg.14296 • Rütters H, CGS Europe partners. State of play on CO_2geological storage in 28 European countries. CGS Europe report. 2013. No. D2.10: p.89. • Tasianas, A., Koukouzas, N., Energy Procedia 86 (2016) 334 – 341, http://creativecommons.org/licenses/by-nc-nd/4.0/, “$CO_{(2)}$ storage capacity estimate in the lithology of the Mesohellenic Trough, Greece”. -Carbon dioxide ($CO_{(2)}$) emissions are NOT waste... Read... Article 12 of European Directive 2009/31/EC stipulates that the CO2 stream to be stored must consist of carbon dioxide, as well as international standards and guidelines, such as ISO 27913....(Carbon dioxide CO_2 is contained in orangeade with carbonated water...) -According to the risk studies and simulations carried out in the context of this project, it is estimated that the effects of CO_2 that could potentially cause adverse H&S impacts in the event of a major accident related to the project or a disaster extend to: • ~780 m from the $CO_{(2)}$ receiving point of the onshore pipeline (or approximately 300-350 m from the boundaries of the Sigma industrial facility), in areas that include neighbouring crops, the adjacent fish farm and the pier, but will not reach residential areas or public facilities. • ~1000 m in the area above sea level and within a few metres radius in the sea from the point of the underwater $CO_{(2)}$transport pipeline that may rupture or from the location of the offshore facilities. READ..... https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2050-long-term-strategy_el....Τα Huge sums of money are not given without control or without commitments and obligations.... https://climate.ec.europa.eu/eu-action/industrial-carbon-management_en Read what will happen to Greek industry if these projects do not go ahead: https://climate.ec.europa.eu/eu-action/eu-emissions-trading-system-eu-ets_en Read.... MAJOR ENVIRONMENTAL ORGANISATIONS that are IN FAVOUR of $CO_{(2)}$storage: World Resources Institute (WRI) Environmental Defense Fund (EDF) The Nature Conservancy...	
21	KYNIGETIKOST HASSOS	HIM	18/02/2025	Negative/Unclear	The decision of the Minister of National Economy and Finance dated 23/12 24, with ref. no. 195829, on the inclusion of the CO_2storage project in Prinos with European funding, which was posted on the internet, is incomplete (!). Specifically, on page 6, where the milestones and objectives of the project are described, item no. 52 is missing and item no. 51. Consultation is not possible without the publication of the complete file without omissions, so an extension of the consultation period is obviously required. We request a. The publication of the complete decision, without omissions, in accordance with the	For the answer to this specific issue, please refer to **Comment 14.**

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					law b. An extension of the consultation period for the legal period from the publication of the complete decision, without omissions	
22	Ioannis	HIM	18/02/2025	Negative/Unclear	Consultation is not possible without the publication of the complete file and without cuts, so an extension of the consultation period is obviously required. The following is required: a. Publication of the full decision without omissions, in accordance with the law b. Extension of the consultation period for the legal period from the publication of the full decision without omissions	For the answer to this specific issue, please refer to **Comment 14.**
23	ELENI	HIM	19/02/2025	Negative/Unclear	The decision of the Minister of National Economy and Finance dated 23/12/24, with reference number 195829, regarding the inclusion of the CO_2 storage project in Prinos with European funding, which was posted on the internet, is incomplete (!). Specifically, on page 6, where the milestones and objectives of the project are described, item no. 52 is missing and item no. 51. Consultation is not possible without the publication of the complete file without omissions, so an extension of the consultation period is obviously required. We request a. The publication of the complete decision, without omissions, in accordance with the law b. An extension of the consultation period for the legal period from the publication of the complete decision, without omissions	For the answer to this specific issue, please refer to **Comment 14.**
24	ILIAS VASILEIOS Municipal Councillor of Thasos	HIM	19/02/2025	Negative	This project is contrary to the type of development we want for our island. We have a duty to leave future generations an island with as little environmental damage as possible. There is a high risk of leakage. We live in an earthquake-prone area. Similar projects have failed in the past. The carbon dioxide storage project is not included in the spatial planning study for the region of Eastern Macedonia and Thrace. It is very close to our coastline. The study has not been published in its entirety for consultation.	This comment is the author's position **against the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS ARISING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. For the issue of seismicity in the project area from the coast, please refer to **Comment 19.2**. For the issue of the project's compatibility with the Spatial Planning of the area, please refer to **Comment 19.3**. The EIA has been submitted in full for consultation, as documented by the completeness check carried out by the supervising authority. In the event that the author of the comment mistakenly refers to "the study" while referring to the decision of 23.12.24 (AP 195829) of the Minister of National Economy and Finance, the issue is examined in detail in the response to **Comment 14.**
25	NIKOLAOS	HIM	19/02/2025	Negative/Unclear	The decision of the Minister of National Economy and Finance dated 23/12 24, with ref. no. 195829, on the inclusion of the CO_2storage project in Prinos with European funding, which was posted on the internet, is incomplete (!). Specifically, on page 6, where the milestones and objectives of the project are described, item no. 52 is missing and item no. 51. Consultation is not possible without the publication of the complete file without omissions, so an extension of the consultation period is obviously required. We request a. The publication of the complete decision, without omissions, in accordance with the law b. An extension of the consultation period for the legal period from the publication of the complete decision, without omissions	For the answer to this specific issue, please refer to **Comment 14.**
26	Sotirios	HIM	20/02/2025	Positive	Two studies have been conducted in the last decade on the environment in our region. The first was in 2016 by the Department of Biology of the University of Athens, which concerned the area around the platforms and concluded that there has been no disruption to biodiversity – on the contrary, populations have grown since fishing around the platforms has been banned. Take a look here: https://ecozen.gr/2016/11/otan-oi-eksedres-paragogis-petrelaiou-afksanoun-tin-thalassia-zoi/ The second was in 2022 by the International University of Greece, as part of the MONITOX programme funded by the European Union, which concluded that the Nestos River wetland, located a few kilometres away from the land facilities in Nea Karvali, was completely free of hydrocarbons. See this characteristic publication: https://www.protothema.gr/environment/article/1215144/apoluta-katharos-o-ugroviotopos-tou-potamou-nestou/ What does this show us? That, at least in our country, the hydrocarbon industry is operating as it should in relation to environmental regulations. And what does the Environmental Impact Study now say? In short, that the impact on fauna (amphibians and reptiles) is neutral, on marine habitats negligible (there are also positive effects as populations are increasing due to the existing fishing ban),), for marine mammals they are minor, with a series of protective measures (but also a positive effect, due to the zone of restrictions on anchoring and fishing that is already in force at the facilities). Something similar to the sea also applies to Natura areas. Gerasimos	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum.

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27	Sotirios	H.P.M.	20/02/2025	Positive	My friend Gerasimos, who works in Chrysoupoli, agreed with my positive comment about the project, as he does not have a Greek identity card or certification codes.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
28	ATHANASIOS	HIM	20/02/2025	Negative	What also concerns me is the aftercare of the project! That is, the ongoing care, continuous monitoring and maintenance of the tanks to prevent corrosion. The company is released from its responsibility after a certain period of time (in Germany it is 40 years). The question is who takes over the responsibility afterwards. Can the community of Thasos take on such a responsibility? Another issue is the visual image of Thasos. I wonder if the island can still be considered a tourist destination when all these tanker trucks are waiting off the coast of Kallirachi to dump CO_2 pollutants into the wells of Prinos. We are now talking about an industrial area, which will result in a fall in the purchase value of property on the island.	The operating conditions of the project are clearly defined by the existing national and EU legal framework, as are the obligations of the project operator after the end of the CO_2 storage process.Upon completion of a CCS project, the **operator** is responsible for monitoring, taking preventive and corrective measures, and sealing the storage site. The transfer of responsibility to the competent authority is only possible under specific conditions that ensure that the stored carbon dioxide remains completely and permanently isolated (see EU Directive 2009/31/EC, Articles 18, 19 and 20). The entire project (not just the drilling) is monitored during operation, at closure and after closure. There are clear European laws, regulations, and obligations (see EU Directive 2009/31/EC on the underground storage of CO_2). A strict measurement-monitoring-verification (MMV) plan is implemented from the start of operation until closure and beyond. In accordance with existing EU and national legislation, the risk, i.e. the liability, of an 'accident' (whatever this general term may include) is borne both during the operation of the facility (i.e. for up to 25 years initially, years, but also for any extension, if the capacity of the storage site allows it) and for a period of 20 years after the closure of the facility. After 20 years have elapsed since closure and provided that all available data indicate that the stored CO_2 will be kept completely and permanently isolated (Article 18 of the relevant Directive 2009/31 of the European Parliament and Article 19 of the existing national legislation), the storage facility shall be handed over to **the competent authority (Greek State)**. As repeatedly mentioned in the project's EIA, Phase 1 of the project (which is also the subject of the project's EIA) includes the following CO_2sources: • Supply of bulk CO_2 via a pipeline reaching the boundaries of the onshore facility under suitable conditions for injection. • Receipt of CO_2 loads at the land-based facilities from trucks through pilot CO_2 capture projects. **In other words, the project under consideration does not include the receipt of CO_2 by ship**. However, even if the reference in the comment to *'tanker trucks'* refers to the receipt of CO_2 cargoes in containers (CO_2parcels), as described in **Section 6.5.1.1.2** of the EIA under evaluation, the wording of the comment is not accurate. As described in that Section, $CO_{(2)}$ cargoes from pilot projects will be transported to the Sigma plant dock by ISO container trucks. The containers will be picked up by a 50-tonne crane, loaded onto the ship's deck (supply ship/transport barge) and transported to the offshore facilities at the Beta platform. High-pressure containers can store CO_2 at ambient temperatures without energy losses associated with liquefaction and cryogenic storage. The following assumptions are made regarding the quantities of CO_2 expected to be received in shipments and the frequency of deliveries: **1** Considering a quantity of 400 tonnes from Pilot Programme 1[1] in the context of the EU's Horizon Europe programme, 19 trips will need to be made by a truck with a capacity of 21,375 kg (indicatively, 18 trips with 100% load capacity, 1 trip with 71% load capacity) to deliver the total quantity of $CO_{(2)}$cargo. A frequency of 1 truck per week is assumed for a period of almost 5 months (19 weeks). **2** Considering a quantity of 40 tonnes from Pilot Programme 2[2] in the context of the EU's Horizon Europe programme, 2 trips will need to be made by a truck with a capacity of 21,375 kg (indicatively, 1 trip with 100% load capacity, 1 trip with 87% load capacity) to deliver the total quantity of $CO_{(2)}$cargo. A frequency of 1 truck every 3 months is considered. As is obvious, the above quantities of CO_2 expected to be received by means other than the pipeline reaching the boundaries of the onshore facility are **negligible**, and if it were decided to transport them by ship, this would require one or two trips. In other words, under no circumstances will there be "tanker trucks waiting offshore at Kallerachi to discharge $CO_{(2)}$pollutants into the Prinos wells." Finally, it should be noted that no impact whatsoever is expected on property values in Thasos due to the construction and operation of the proposed project. This assessment is based on the fact that the project is not expected to have any significant negative impact on the human environment. Furthermore, the area has already hosted other development activities without any significant impact on property values being observed, which further reinforces this assessment.
29	DEMETRA	HIM	20/02/2025	Positive	The paranoia and lies continue... Unfortunately, Thanasis... The ships will not dock at Kallirachi or at the platforms...It was one of the first questions asked by the regional authority and especially the Deputy Regional Governor for Tourism... Read the EIA that is	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum.

[1] HERCCULES/HORIZON-CL5-2022-D3-01 Call (Project no. 101096691)
[2] COREU/ HORIZON-CL5-2023-D3-01 (Project No. 101136217)

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					being discussed... The ships will emit carbon dioxide (CO_2) present in the orange grove with carbonate, and it is not pollution, but rather an EMISSION in the area where tankers currently load oil... that is, next to the industrial oil facility in N. Karvali, where the land facilities are located. I am also attaching copies of the statements made by reputable academics and studies. -Prinos is a completely safe choice for $CO_{(2)}$storage.-The project is designed to operate at lower pressures than those originally found in the reservoir, which has been hosting hydrocarbons in complete safety for millions of years. -The operation of the project has no negative impact on any other activity, such as tourism and fishing. A $CO_{(2)}$storage project is already operating in Ravenna, Italy, on the Adriatic coast, in an area with particularly high tourist activity, while major projects are planned in countries such as Norway, Denmark, the Netherlands, the United Kingdom, etc. -The implementation of the investment will enable domestic industries to remain in operation by storing $CO_{(2)}$,as required by EU directives, and avoiding a significant blow to their competitiveness from the cost of emissions -Industrial activity in the Gulf of Kavala will be guaranteed for at least another 25 years. -New know-how and direct and indirect jobs with added value will be created. -The prospects for the younger generation to study and work in the region will be significantly enhanced. -Prinos will become a model in the Mediterranean, increasing the geopolitical importance and recognition of Thasos, Kavala and the wider region. -Even in the unlikely event of a leak, the impact would be limited to the site and could be remedied very quickly. $CO_{(2)}$is NOT flammable and dissolves in air and water. I wonder how tourists have been coming to Thasos for 40 years... where oil is produced...	
30	Thodoris	HIM	20/02/2025	Positive	We must understand that at this moment there is no other way to lighten the atmosphere than to store carbon dioxide (CO_2) Unless we say that we will shut down industries and return to stone and straw houses and burn logs for heating. If a technology is found that allows carbon dioxide ($CO_{(2)}$)to be captured in the chimney and used for some purpose, we will no longer need storage. As for why Prinos: the answer is easy. Because the ideal way to store it is in hydrocarbon deposits, which have been exhausted or are close to exhaustion. Let the conspiracy theorists be, there is a frenzy for these projects all over Europe, even in residential areas. The jobs of 180 employees must be preserved... Here we have an investment of over €1 billion that is setting a precedent for the Mediterranean, and the usual interests are fighting it... https://www.kavalapost.gr/top-news/329253/edeyep-odigos-o-prinos-sti-synergasia-elladas-aigyptoy-sto-ccs/#	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be addressed in this Memorandum.
31	Greek Network of Naturefriends/ Naturefriends Greece	HEM	20/02/2025	Negative	This is not a development project as presented, but a project for the transport and management of industrial waste, which will turn the area into a landfill site for Europe. It is a project that could cause a large-scale industrial accident because: a. The impermeability of the storage facility is not guaranteed. b. The area is earthquake-prone, as has been clearly demonstrated in recent days. c. No one can guarantee how the storage site will react to CO2 compression (the argument that it is safe because it was previously used for mining is invalid). d. Not all safety guarantees for operation and potential accidents are met. e. Accident at sea: CO2 leakage will make the water more acidic, with unpredictable consequences for the marine environment and, of course, for fishing. f. An accident in the air means that the CO2 cloud could have fatal consequences. g. No one can guarantee that the CO2 will be properly separated from the extremely toxic compounds of factory pollutants and that these will not also be transferred to Prinos. h. Many similar projects have been halted during construction due to unforeseen costs, but not before causing damage to the environment. Furthermore, there is no guarantee that the contractors will continue to operate the project after the pollutants have been transferred. Literally, the island and the opposite area are becoming hostages to unknown forces. A time bomb is being planted in the area. Recent criminal negligence in many of our country's infrastructure projects makes this project even more uncertain in terms of compliance with the necessary safety requirements. The project is not as environmentally "green" as it is presented. On the contrary: environmental scientists and the ecological movement consider it unacceptable. The CCS method cannot contribute positively to tackling the climate crisis as it does not address the CO2 already emitted but indirectly supports its continued emission. (The scientific community recommends the DAC method). It is no coincidence that the largest CCS projects on the planet have failed. In addition, scientists have pointed out that this particular project in Prinos raises suspicions of hidden mining. The location of such a project in the Gulf of Kavala is unacceptable because: a. It conflicts with the character of the area as a protected area oriented towards tourism development, with irreparable consequences for the economic, cultural and	For answers to these questions, please refer to **Comments 19.1** to **19.16.**

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					social life of the area. b. It is not provided for or permitted by the General Spatial Plan for the area. c. The case of Ravenna, which is used as a model in the case of Prinos, is of a different size and design, and its platform is 14 miles from the Italian coast. This is in fact a huge speculative venture, using the climate crisis as a pretext, from which the companies involved will earn huge amounts at the expense of taxpayers and consumers, who will bear the brunt of the increase in product costs. The amounts 'invested' by the recovery fund are enormous, as are those being wasted, while the project may be abandoned by 2028. This money could be invested in essential infrastructure in the local community. The argument that the investment is in the 'national interest' does not hold water because: a. Under no circumstances can turning a country into a dumping ground for pollutants be considered in the national interest.	
32.1	Lampros	HMP	20/02/2025	Negative	I. Position on the project "Environmental Impact Assessment (EIA) of the Project: $CO_{(2)}$Storage Unit in Prinos by LDK Consultants on behalf of EnEarth" https://www.tourism-network-thassos.com/library/thassos/2024/prinos/Prinos_my_Bericht_2025_01_28.pdf The news that the "wells" of Prinos will be used as a final landfill site for CO_2 pollutants for hundreds to thousands of years has alarmed many residents of Thasos and the wider area, especially those involved in tourism or living within walking distance of the wells. The plan of EnEarth, a subsidiary of Energeani, is to store up to three million tonnes of $CO_{(2)}$ pollutants per year in Prinos. The pollutants will come from power stations, waste incineration plants, refineries, plastic, fertiliser and cement production facilities, etc. The $CO_{(2)}$pollutants captured from the chimneys of the facilities/factories will end up in Prinos via pipelines from Bulgaria, ships from Croatia and Italy, and trucks from nearby areas. This will create the largest $CO_{(2)}$pollutant landfill site in Southeast Europe, which will have a huge negative impact on the future tourism landscape of the island and the surrounding area. The degradation of Thassos as a tourist destination can no longer be avoided. From a leisure destination, we are becoming an industrial zone for the collection of pollutants, a cheap tourist destination, thereby jeopardising hundreds of investments, large and small, that have been made or are being made across the island. The Environmental Impact Assessment (EIA) focuses more on the construction phase of the facilities and much less on the long-term impact that the project will have on the area, an impact which, as similar studies show, may be active for over 1,000 years.	As has been repeatedly stated, **$CO_2$is not a waste product**, but a product of all fossil fuel combustion (coal, oil, petrol, natural gas, etc.), but also of wood, plastics and other organic compounds, as well as from a number of natural processes (decomposition of organic substances, volcanic activity, dissolution of carbonate rocks). It is also produced during the respiration of all plants and animals and by fungi and microorganisms that depend directly or indirectly on plants for their food. Finally, $CO_{(2)}$is not only found throughout the natural environment, but also in popular commercial products. $CO_2$is not a waste product but a greenhouse gas, i.e. it contributes to the retention of solar radiation in the atmosphere, resulting in an increase in temperature. However, this property does not make it a waste product. The greenhouse gases with the highest concentration in the atmosphere are pure water ($H_{(2)}O$) and SF6 (sulphur hexafluoride), a colourless, odourless, non-toxic and very stable gas with excellent insulating properties ( ), which is used in particular in high-voltage power equipment (such as circuit breakers, transformers, circuit breakers). Consequently, AtMs cannot be defined as 'waste'. In fact, it is important to note that the CO_2 to be stored under the proposed project must meet specific requirements as set out in the relevant EU Directives (for example, DIRECTIVE 2009/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 2³ April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC and 2008/1/EC, and Regulation (EC) No 1013/2006) and Quality Standards (indicatively ISO 27913:2024 'Carbon dioxide capture, transportation and geological storage — Pipeline transportation systems'). According to EU Directive 2009/31/EC, the CO_2stream consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies that emit carbon dioxide and the company that receives it for storage to ensure that this requirement is met. This section of the comment contains a number of inaccuracies, which add to the confusion surrounding the proposed project and the EIA under evaluation. More specifically, the operation of the facility is expected to be developed in two distinct phases (Phase 1 & Phase 2) for reasons of scalability and adaptability to market conditions, each of which has synergistic potential to achieve significant $CO_{(2)}$reductions. • Phase 1: initial nominal capacity of up to 1 MTPA. • Phase 2: expansion to a final nominal capacity of up to 3 MTPA. This EIA concerns exclusively phase 1 of the installation, therefore the nominal capacity is 1 MTPA and not 3 MTPA, as claimed by the author of the comment. As repeatedly stated in the EIA for the project, Phase 1 of the project (which is also the subject of the EIA for the project) includes the following CO_2sources: • Supply of bulk CO_2 via pipeline reaching the boundaries of the onshore facility under suitable conditions for injection. • Receipt of CO_2 loads at the onshore facilities from trucks through pilot CO_2 capture projects Therefore, as described in detail in Section 6.5.1.1 of the EIA, the project will not be supplied by 'ships from Croatia and Italy, but also by trucks from closer areas'. Furthermore, under no circumstances does this EIA authorise a $CO_{(2)}$ transport pipeline,let alone 'pipelines from Bulgaria' as claimed by the author of the comment. Finally, it should be noted that the EIA thoroughly and in depth analyses any potential impacts on the human environment of the study area (including those on tourism and the socio-economic environment), both from the normal operation of the project and from possible accidents and unforeseen events, as well as from climate change (**Sections 10.2, 10.4** and **10.5** of the EIA). The application of the EIA procedure to all phases of the project's life cycle (construction, operation and decommissioning) shows that no significant adverse effects on tourism and the socio-economic environment (as well as on the other P&K Parameters of the study area).

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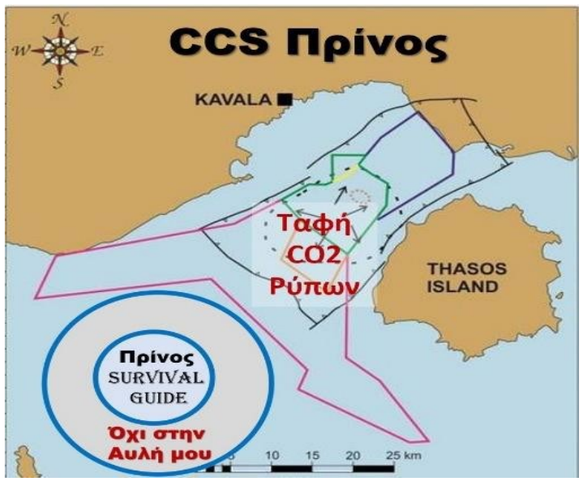
32.2	Lampros	EIA	20/02/2025	Negative	II. Position on the Project following the Workshop in Kalogerikos https://www.tourism-network-thassos.com/library/thassos/2024/prinos/Agenda_Kalogeriko.pdf Thasos has nothing to gain from this project. In 2023, the state collected only €64,000 from Energean. What will it collect from the storage of pollutants? What about the promised jobs and donations to schools, churches and sports clubs? How much of the €1.1 billion will return to the Kavala region? If there is a chance that something will go wrong, it will. That is what the odds tell us. So why should the region take on such a risk for hundreds or thousands of years when it will not reap any benefits? We have driven all industry out of our region. Are we now going to import pollutants and destroy our tourist paradises? Why should I come as a tourist to Thassos in the next 1,000 years when I know that two or three kilometres from the coast of Rachoni, Prinos, Sotiras or Kallirachi, a sudden explosion could occur? Is this the development we want? Should we pray every day that nothing bad happens? III. Video describing the negative impact of the project on tourism in Thassos https://www.tourism-network-thassos.com/library/thassos/2024/prinos/2024_12_26_CCS_Prinos_Greenpeace.mp4 	The socio-economic impact of Energean's activities is not limited to the money that, as the comment states, is paid to the state. On the contrary, Energean's activities in Kavala bring a wide range of direct and indirect benefits to the wider region. For example, through the operation of the production process at the Prinos deposits, the operator Energean contributes around **€15 million** each year (salaries for local workers, investments by local companies, maintenance, supplies of machinery and goods, transport, room rentals, Corporate Social Responsibility actions) to the local economies of the Region of Eastern Macedonia & Thrace, with a focus on the prefecture of Kavala. From the same activity, which remains loss-making over time with tax losses of around €400 million, the Greek State, social security funds and public interest companies collect around **€27 million annually**. The implementation of the investment, which will exceed €1 billion, will ensure that industrial activity in the Gulf of Kavala continues, which is of great importance for the region. The implementation of the investment, which will exceed €1 billion, will ensure that industrial activity in the Gulf of Kavala continues, something that cannot be guaranteed with oil production. The special operating unit for the CO_2 storage project will employ more than 40 people. During the construction phase of the project, more than 200 people will be employed. A large part of the investment (which will exceed €1 billion) will be carried out with the participation of local businesses and contractors, bringing additional income that will spread throughout the Region of Eastern Macedonia & Thrace, with a focus on the prefecture of Kavala, which will obviously also boost the tourist product of Thasos as the closest recognisable tourist destination. **After all, tourist activity in the Gulf of Kavala and Thasos developed while oil production from the Prinos deposits had already been in operation since the early 1980s.** However, it should be noted that CO_2emissions into the atmosphere are significantly cheaper in the short term than capture and storage. However, the effects of climate change, although they seem distant, are much more painful as they endanger or even take human lives, and dealing with them is extremely costly. The following incidents are indicative of the effects of climate change • **Fires in Australia (2019–2020):** 33 victims, the destruction of 3,000 homes and 10 million hectares. Wildlife casualties were estimated in the billions. • **Cyclone Amphan (May 2020):** Hitting India and Bangladesh, Amphan caused 129 casualties and displaced millions of people. Economic damage was estimated at $14 billion. • **Atlantic Hurricane Season (second half of 2020 and 2021):** A record number of storms caused at least 400 deaths and $41 billion in damage across the American continent, making it the most expensive storm season in history. Hurricane Ida in 2021, in Louisiana, caused at least 95 deaths and damage exceeding $65 billion, affecting several states. • **Floods in Europe (July 2021, September 2023, October 2024):** Severe flooding in Germany and Belgium caused over 200 deaths and extensive damage. Storm Daniel in Thessaly claimed 17 lives and caused a further 350 deaths in subsequent months, as well as extensive damage exceeding €5 billion. Finally, severe flooding in the Valencia region claimed over 219 lives, left 19 people missing and caused damage exceeding €30 billion. • **Fires in California (Summer 2023 and Winter 2025):** Dozens of deaths, destruction of thousands of homes and damage amounting to tens of billions of dollars. Similarly, the process of capturing, transporting and storing $CO_2$is obviously more energy-intensive than direct release into the atmosphere. The energy requirements for the entire CCS chain depend in particular on the capture technology and the means of transport (ship, pipeline). The storage process has lower energy requirements than capture. For the entire chain, energy requirements can range from 150 to 450 GWh per year, depending on the technology. This corresponds to the energy produced by a conventional power plant of 20-50 MW or the energy produced by 14-40 wind turbines of 5 MW. Both the Greek industry that will use the storage facility and EnEarth are planning to sign long-term contracts for the purchase of energy from RES, so not only will the cost of covering energy needs be minimal, but the development of the chain will also contribute to the absorption of discarded RES energy.of the chain will also contribute to the absorption of discarded RES energy. Indicatively, it is noted that discarded RES energy in 2024, , i.e. energy that was 'suppressed' and not consumed, was 860 GWh, which is much more than the energy needs of a $CO_{(2)}$chain.However, even if part of the energy (e.g. 20%) comes from electricity generation using natural gas as fuel, the $CO_{(2)}$produced does not exceed 16 kg per tonne of $CO_{(2)}$stored, i.e. just 1.7%. There is therefore no doubt about the significant positive impact of the proposed project. However, the commentator's argument that "*If there is a chance that something will go wrong, it will go wrong. That's what the odds tell us*" is particularly interesting. The odds clearly do not tell us this, because according to this logic, any facility with a chance of a major accident (e.g. airports, ports, industrial plants, dams, etc.) should already have been abandoned. Similarly, a "sudden explosion" cannot occur at distances of "two or three kilometres from the coast of Rachoni, Prinos, Sotiras or Kallirachi", as detailed in **Section 10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE**

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						PROJECT TO THE RISK OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT' of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. Based on the documentation in this section and in accordance with the risk studies and simulations carried out in the context of the proposed project, it is estimated that the toxic effects of CO_2 that could potentially cause adverse H&S impacts in the event of a serious accident related to the project or disaster extend to: • ~780 m from the CO_2 receiving point of the onshore pipeline (or approximately 300-350 m from the boundaries of the Sigma industrial facility), in areas that include neighbouring crops, the adjacent fish farm and the pier, but will not reach residential areas or public facilities. • ~1000 m in the area above sea level and within a few metres radius in the sea from the point of the underwater CO^2transport pipeline that may rupture or from the location of the offshore facilities. It follows from the above that both the probabilities and the geographical spread of potential impacts with fatalities are relatively limited and in most cases smaller than those that may occur in the event of accidents in normal industrial structures and facilities. In any case, even in the event of a serious accident related to the project or a disaster, their geographical distribution does not affect areas with residential or holiday activity (including the areas mentioned in the comment). Furthermore, it is clear that even in the unlikely event of a serious accident, any impact would be limited to the site of the facilities and would not affect residential areas or human activities in the area. Finally, it should be noted that tourists currently visit Thasos, which is known to be the location of hydrocarbon extraction activities, which carry risks of accidents and disasters. Therefore, it is unclear why tourists would be discouraged by the operation of the CCS project, which, it is worth noting that it has a significantly lower probability of causing a serious accident or disaster than hydrocarbon extraction activities.
32.3	Lampros	HMP	20/02/2025	Negative	**FILE:** Prinos_my_Bericht_2025_01_28.pdf Position on the project "Environmental Impact Assessment (EIA) of the Project: **CO2 Storage Unit in Prinos** by **LDK Consultants** on behalf of EnEarth Summary The news that the "wells" of Prinos will be used as a final landfill site for CO_2 pollutants for hundreds to thousands of years has alarmed many residents of Thasos and the wider region, especially those involved in tourism or living within walking distance of the wells. The plan of EnEarth, a subsidiary of Energeani, is to store up to three million tonnes of $CO_{(2)}$ pollutants per year in Prinos. The pollutants will come from power stations, waste incineration plants, refineries, plastic, fertiliser and cement production facilities, etc. The $CO_{(2)}$pollutants captured from the chimneys of the facilities/factories will end up in Prinos via pipelines from Bulgaria, ships from Croatia and Italy, and trucks from nearby areas. This will create the largest $CO_{(2)}$pollutant landfill site in Southeast Europe, which will have a huge negative impact on the future tourism landscape of the island and the surrounding area. The degradation of Thassos as a tourist destination can no longer be avoided. From a leisure destination, we are becoming an industrial zone for the collection of pollutants, a cheap tourist destination, thereby jeopardising hundreds of investments, large and small, that have been made or are being made across the island. The Environmental Impact Assessment (EIA) focuses more on the construction phase of the facilities and much less on the long-term impact that the project will have on the area, an impact which, as similar studies show, may be active for over 1,000 years.	For answers to these specific questions, please refer to **Comment 31.2.**
32.4	Lampros	HEM	20/02/2025	Negative	The fact is that the short- to medium-term decarbonisation of energy-intensive industries, such as the cement industry, while maintaining their industrial competitiveness, requires large-scale commercial development of CCS ii (see Annex I: CCS Business Model, page 12). However, there is currently no market-based business model that makes the CCS value chain, i.e. the capture and permanent storage of $CO_{(2)}$ cannot be achieved at market prices, requiring large subsidies from taxpayers' money from EU funds. On the other hand, with Trump's election in the US, we are seeing a policy of intensifying the extraction and use of fossil fuels ("Drill, Baby,Drill" policy) which will not leave the EU's energy landscape unaffected in the coming years, and the issue of funding in the EU certainly needs to be reconsidered. Funding the entire chain of capture/transport/storage by the EU will lead, on the one hand, to a prolongation of the use of fossil fuels and, on the other hand, to the need to create new, extremely expensive infrastructure along this chain, which will produce additional CO_2 iii and slow down the energy transition for years to come. At the same time, alternative options based on new innovative technologies and nature-based methods such as reforestation or rewetting of peatlands are being neglected (Annex II, page 13). Without giving us an estimate of how many centuries the CO_2 stored in Prinos	CCS chain projects are clearly **costly** and **do not offer a high return on investment**. For this very reason, European countries are approving billions of euros in subsidies to ensure that these projects are implemented, as storage is currently the most effective, safe and cheapest method of reducing carbon dioxide emissions. In this context, CCS projects are included in the proposed measures to achieve climate neutrality, both in the context of national strategies and European policies. It should be noted that the implementation of Carbon Capture and Storage (CCS) projects is a technical/regulatory/economic measure with code **'M38 - Decarbonisation of industry through the promotion of carbon capture and storage (CCS) technologies,** with the aim of "Reducing emissions in the industrial sector" of the revised NECP. It should also be noted that the European Parliament has included investments in carbon capture and storage in the EU list of **"green" investments, known as the EU Taxonomy, while on the other hand it has included the relevant technologies in the Strategic Technologies for Europe Platform (STEP).** According to Article 2(1) of the STEP Regulation, clean and resource-efficient technologies include zero net emission technologies as defined in Article 4 of the NZIA. The **NZIA** Regulation is Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13 June 2024, establishing a framework for measures to strengthen Europe's net-zero emission technology ecosystem and amending Regulation (EU) 2018/1724'. Article 4 of the NZIA, which presents the "List of net-zero emission technologies", also includes "Carbon capture and storage technologies".

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					will last for centuries, it starts from the general working assumption that the impact on the local socio-economic environment for the installation and restoration works will be strongly positive from the implementation of the proposed project (Page 10/55,904 of the study). However, a strategic parameter is the residence time of CO(2) in the Prinos wells. No study provides reliable risk assessments for the next 100, 200 or 1000 years that CO(2) may be stored in Prinos.	From the above, it is clear that the comment's assertion that CCS projects "*slow down the energy transition for years*" is in no way valid. On the contrary, the international scientific community and the relevant national and European institutional authorities consider CCS projects to be "green investments" using clean and resource-efficient technologies, prioritise and subsidise them, recognising that they are currently the most effective, safe and cheapest method of reducing carbon dioxide emissions. As for the allegations about prolonging the extraction and use of fossil fuels, it is clear that the CO_2stored in Prinos will not be used for enhanced oil recovery. For a more detailed answer to this question, please refer to **Comment 19.11.** Finally, a series of technical studies and simulations were carried out and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos reservoir", the retention of carbon dioxide in the geological formations of the reservoir over hundreds and thousands of years is presented in detail, with a gradual INCREASE in permanent storage processes over time (meaning that after the end of injection, storage becomes increasingly stable as time passes). For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure.
32.5	Lampros	EIA	20/02/2025	Negative	The aim of this project is not, as it seems, to avoid CO_2emissions,but to continue burning fossil fuels. CCS projects funded under the Green Deal seek to reduce CO(2)by burying it in the ground and passing the risk on to future generations. For us in Thasos, this means that EnEarth will have to bury increasing amounts of CO_2because only then will its CCS investment in Prinos be profitable (economies of scale). And all this with taxpayers' money. According to data from the International Association of Oil & Gas Producers (IOGP)v, the cost of the entire CCS value chain in the EU is estimated to be between €150 and €230 per tonne of CO(2) vi, while today (13 January 2025) the European Union Emission Trading System (EU-ETS)/ Emissions Trading System (EU ETS) that the price is €77.9/tonne of CO(2) vii. The difference will be paid by the taxpayer. So why are we wasting so many years and not investing these amounts directly in real alternative forms of energy?	This comment is inaccurate for the following reasons (a) The primary objective of the proposed project is to store CO_2 released by chemical processes. One such chemical process is cement production. In cement production, the raw material, hot calcium carbonate, produces calcium oxide and carbon dioxide, which is released into the atmosphere. **Even if the heat required for this chemical reaction is produced by an electric heater, which in turn is powered by renewable energy, CO2 will still be released because it is a product of the reaction CaCO(3) ->CaO+CO_2**. (b) There is no significant risk from the injection of CO_2into underground geological formations such as Prinos, which have kept oil and gas trapped for millions of years. If such issues existed, oil and gas would have leaked out many hundreds of centuries ago. However, it should be noted that relevant simulations have been carried out for these specific risks, which relate to both technical studies that were prepared and submitted to the competent state body (EDEYEP) as part of the "Application for CO_2 in the Prinos reservoir, as well as in the relevant chapters of the project's EIA. For a detailed presentation of the risks related to the Project facilities and the possible impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **the** relevant **Section '10.4 IMPACTS ARISING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. (c) The term **'economy of scale'** is not used correctly. Economy of scale has two aspects (i) internal economy of scale when, within a company, costs are reduced through better technology, more efficient management, purchasing raw materials in large quantities at a discount, reducing the cost per unit, and better lending terms for larger companies compared to smaller ones, and (ii) external economies of scale through industry growth, supplier efficiency and workforce specialisation. None of the above is related to the quantity of the product, but rather to the reduction in price per unit of product. It is therefore misleading and incorrect to say that EnEarth should bury increasing amounts of CO(2) because this is the only way to make CCS investment profitable. The space in Prinos is limited. (d) Investments in CO_2capture, transport and storage technologies are made for the following two reasons: (i) to reduce emissions from industrial processes and (ii) to maintain the competitiveness of European industry. A loss of competitiveness would quite simply mean the loss of hundreds of thousands of jobs in Greece and a significant reduction in gross national product, because the price of emission allowances is expected to rise well above the current price, which, among other imprecise assumptions, has been correctly estimated in the context of this comment. With emission rights priced at €150 or €200 per tonne of carbon dioxide, the development of CCS chains is the only way forward. In any case, there is no question of burdening the taxpayer. The cost of emissions is borne by the cost of the final product, which without CCS would be unaffordable for the consumer. (e) The investment is being developed with European subsidies, loans and own funds. If it does not go ahead, the European money will simply be allocated to another similar investment in another country, Greek taxpayers will pay dearly for the demise of small Greek industry, and Greece will miss a unique opportunity to take the lead instead of being the last wheel on the cart, as is unfortunately often the case. (f) The author's proposal to invest the difference between the price of emission rights and the cost of the CO_2chain in 'alternative' forms of energy, as mentioned, is interesting. On this point, we refer to points (a) and (c) above and further emphasise that alternative energy sources (the author is obviously referring to RES) depend on the wind

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						blowing and the sun shining. In their absence, some other form of energy will have to provide electricity to our homes.
32.6	Lampros	HMP	20/02/2025	Negative	The plan to bury pollutants in Prinos will weaken the London Convention, an agreement on marine protection that prohibits the export of waste. The need to turn Prinos into a $CO_{(2)}$landfill site therefore takes precedence over the protection of the seas and the environment. The injection of hundreds of millions of tonnes of CO_2under the seabed poses incalculable risks to humans, the environment and marine organisms in the event of a blowout (sudden explosion).	The comment probably deliberately refers to CO_2 as "waste" and its storage process as "landfill", which are inaccurate references. As mentioned above, **CO_2 is not waste**, but a product of all fossil fuel combustion (coal, oil, petrol, natural gas, etc.), but also of wood, plastics and other organic compounds, as well as from a number of natural processes (decomposition of organic substances, volcanic activity, dissolution of carbonate rocks). It is also produced during the respiration of all plants and animals and by fungi and microorganisms that depend directly or indirectly on plants for their food. Finally, $CO_{(2)}$is not only found throughout the natural environment, but also in popular commercial products. Indeed, it is important to note that the $CO_2$to be stored under the proposed project must meet specific requirements as set out in the relevant EU Directives (for example, DIRECTIVE 2009/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 2³ April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC and 2008/1/EC, and Regulation (EC) No 1013/2006) and Quality Standards (indicatively ISO 27913:2024 'Carbon dioxide capture, transportation and geological storage — Pipeline transportation systems'). According to EU Directive 2009/31/EC, the CO_2stream consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies that emit carbon dioxide and the company that receives it for storage to ensure that this requirement is met. In addition, the term "landfill" refers to specific procedures and infrastructure, which are clearly defined by the existing national [indicatively: Ministerial Decision YPEN/DDA/90439/1846/2021 (Government Gazette 4514/B` 30.9.2021] and the EU legal framework (indicatively: Council Directive 99/31/EC of 26April 1999 on the landfill of waste, as amended by Directive (EU) 2018/850 of the European Parliament and of the Council of 30 May 2018). As is clear, CCS processes, which are defined as *"$CO_{(2)}$storage in geological formations", mean the injection accompanied by storage of $CO_{(2)}$streams in underground geological* formations; (Article 2 of **DIRECTIVE 2009/31/EC of 23April 2009**), are in no way related to the "landfill" of waste, and any references to them as such are due to ignorance of the subject matter or an attempt to create a negative impression of the project. The compatibility of the project with the London Convention is the subject of 'Section 5.2.4.12 Convention for the Prevention of Marine Pollution by Dumping of Wastes and Other Matter (London Convention)', which explains that in 1996, the 'London Protocol' was agreed upon for the further modernisation of the 'London Convention' and ultimately its replacement. According to the Protocol, any disposal practice is prohibited except for any **acceptable waste** on the so-called "**reverse** list" which includes the following: • Dredging materials. • Urban sewage sludge. • Fish waste. • Vessels and platforms. • Inert, inorganic geological materials (e.g. mining waste). • Organic materials of natural origin. • Bulky objects mainly consisting of iron, steel, concrete. • **Waste from carbon dioxide capture processes.** As is evident, since *$CO_2$is not a waste, while the waste from* **its capture** *process* **is included in** the "**reverse** list," the Project complies with the restrictions and guidelines of the Protocol, which aim to prevent marine pollution from the disposal of residues and other materials. **Finally, it is important to note that CO_2 is neither flammable nor explosive, meaning that the risk of explosion during injection is negligible**. However, in line with best practices and regulatory requirements, appropriate safety measures will be taken. These include safety valves below the seabed (within the well) and automatic emergency shut-off mechanisms designed to control the well in the event of any unexpected integrity issues. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to major accident or disaster hazards, please refer to **Section '10.4 IMPACT OF THE PROJECT'S VULNERABILITY TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** in the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. In any case, it is clear that even in the unlikely event of a serious accident, any impacts would be limited to the site of the facilities and would not affect residential areas or human activities.

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32.7	Lampros	HPP	20/02/2025	Negative	In addition, it will have unpredictable monitoring problems in future generations.	It is unclear what the author of the comment means by the statement "*it will have unpredictable monitoring problems in future generations*", since the monitoring procedures are perfectly clear and in no way cause *"unpredictable problems"*. In any case, monitoring programmes and plans are available and are already being implemented effectively in countries that have incorporated this specific know-how into their planning and are constantly evolving within the EU framework. According to EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a system of corrective measures are an integral part of the CO_2 at the Prinos storage site and their **prior approval** by EDEYEP and the competent EU climate directorate is a prerequisite for the **completion of the licensing process**, which is fully covered by a study conducted by an international firm with experience in the relevant field. In accordance with EU and national law, the monitoring programme is fully implemented both during all years of operation of the storage site and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take into account changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology. **It is recommended that the company proceed with the specification of the CO_2leak monitoring programme, in accordance with its obligations, to ensure that any leaks that may occur can be immediately detected and addressed.**
32.8	Lampros	HMP	20/02/2025	Negative	We also need clarification regarding the spatial planning of infrastructure, e.g. the pipeline from Bulgaria. Will it pass through densely populated areas? What will happen in the event of a leak? Are we putting the lives and health of humans and animals at risk?	The comment does not concern the contents of the EIA and therefore does not need to be addressed in this Memorandum. It should be noted that "pipeline from Bulgaria" is not mentioned anywhere in the EIA for the project.
32.9	Lampros	HPP	20/02/2025	Negative	The Intergovernmental Panel on Climate Change considers CCS to be the most expensive effort to reduce CO2 emissions. It describes its effectiveness as uncertain. Experience to date shows that CCS projects around the world have largely failed, e.g. the Salah project in Algeria, Gorden Australia and many others. The failure rate of CCS projects is high (88% for projects from 1972 to 2018)viii. High energy consumption and the dominant use of fossil fuels show us that CCS is a harmful and dangerous technology for humans, the climate and the environment. It exacerbates the climate crisis, pollutes the sea and jeopardises the real energy transition. Nevertheless, in Greece we bury this waste a stone's throw away from our villages and tourist resorts. The main beneficiaries will be the fossil fuel industry, while society will have to bear the cost (billions) for centuries to come.	The author of the commentary as the "Intergovernmental Panel on Climate Change" is most likely referring to the United Nations Intergovernmental Panel on Climate Change, which he uses as a source to present arguments that are completely contrary to those actually supported by the committee, which is the most authoritative body of the United Nations in terms of technical supportand analysis of the effects of climate change. The IPCC, in its most recent 6th Report (IPCC Sixth Assessment AR6 Synthesis Report), published before COP28, states the following on page 21 regarding CCS chains: *"CCS is an option for reducing emissions from large-scale energy and industrial sources [...]. **$CO_{(2)}$capture and subsurface injection is a mature technology** for gas processing and enhanced oil recovery. Unlike in the oil and gas sector, CCS is less mature in the electricity sector, as well as in cement and chemical production, **where it is, however, a critical option for mitigating $_{CO_2}$ concentration.[..], If a suitable geological storage site is selected and managed appropriately, it is estimated that $_{CO_2}$can be stored permanently and thus removed from the atmosphere.** The implementation of CCS currently faces technological, economic, institutional, ecological-environmental and socio-cultural barriers [..]. The establishment of conditions such as policy instruments, greater public support and technological innovation could reduce these barriers.* In other words, the IPCC does not consider CCS to be an ineffective mechanism, but rather recognises it as an important tool for tackling climate change, emphasising the permanence of underground CO_2 and points out that it is a mature technology given its many years of application in the oil industry. The lack of widespread adoption to date is due to the cost of capture, transport and storage compared to direct $CO_{(2)}$ emissions into the atmosphere, with all the negative consequences that this entails. In the United States, there are currently 8,400 km of CO_2transport pipelines. This figure is six times the length of the Greek natural gas transport system. In addition, there are approximately 6,000 km under construction, meaning that the CO_2 system in the US is expected to double in the coming years. Indeed, only in recent years has the CCS chain experienced significant growth, but this is due to increasing commitments to combat climate change. Obviously, the call for CO_2in the atmosphere is the most economically advantageous solution for industry. However, it is this ongoing appeal that will place an unbearable burden on future generations, who will be called upon to pay the unbearable cost of climate change in every respect. The comment that CCS projects around the world have failed is not accurate. For example, the Sleipner Vest and Snøhvit projects in Norway have been operating since the 1990s without any problems whatsoever, as have Quest and Boundary Dam in Canada, which have been operating for a decade. The In Salah project in Algeria, which the author chooses to highlight as a failure, has also been operating for almost a decade and was the first onshore storage project (as opposed to the offshore Prinos $CO_{(2)\ project}$). In Salah did indeed close earlier than planned because of a risk of $CO_{(2)}$leakage from old wells, which ultimately did not occur. As for Gorgon in Australia, the problems it faced relate to the capture of CO_2 during its separation from natural gas in the production of the latter. The CO_2 storage facility in Prinos has a completely different development model and does not involve separation during oil production. Furthermore, the author refers to CO_2 as waste. However, **CO_2 is not waste**, but a product of all fossil fuel combustion (coal, oil, petrol, natural gas, etc.), but also of wood, plastics and other organic compounds, as well as from a number of natural processes (decomposition of organic substances, volcanic activity, dissolution of

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						carbonate rocks). It is also produced during the respiration of all plants and animals and by fungi and microorganisms that depend directly or indirectly on plants for their food. Finally, $CO_{(2)}$is not only found throughout the natural environment, but also in popular commercial products. $CO_2$is not a waste product but a greenhouse gas, i.e. it contributes to the retention of solar radiation in the atmosphere, resulting in an increase in temperature. However, this property does not make it a waste product. The greenhouse gases with the highest concentration in the atmosphere are pure water ($H_{(2)}O$) and SF6 (sulphur hexafluoride), a colourless, odourless, non-toxic and very stable gas with excellent insulating properties, which is used in particular in high-voltage power management equipment (such as circuit breakers, transformers, circuit breakers). Consequently, SF6 gases cannot be defined as 'waste'.
32.10	Lampros	WEEE	20/02/2025	Negative	The EU, the International Association of Oil & Gas Producers and the industry lobby present CCS as the only solution to the greenhouse effect. Contrary to the EnEarth ix study, other studies indicate that the application of this method is controversial and requires a regulatory hierarchy of objectives that follows the criteria of sustainability, nature conservation and risk minimisation, because the burden of risks and consequences of storage is largely local. Dozens of environmental organisations, mainly in the North Sea (see Annex III, pp. 14-15) are protesting against its implementation. It is therefore particularly important for social acceptance that information is provided in a transparent and comprehensible manner. Meanwhile, the oil and gas industry has already succeeded through lobbying in being able to reap the profits first and then pass on the responsibility for the risks to society by elevating the project to the level of a national strategy, as emphasised by Dr. Katerina Sardis, Managing Director of Energean in Greece: "Public perception is generally neutral, but fear of the new may lurk. EnEarth is already implementing a stakeholder engagement campaign, but the promotion of the project should be considered part of a broader national strategy." xi. To achieve climate change targets, EU policymakers are increasingly interested in ensuring that industries such as steel, cement, aviation and shipping receive the funding they need to reduce their emissions. And of course, who would be better suited to inject CO_2 under the seabed? Naturally, companies that know exactly where the wells are located. In its environmental study, EnEarth puts it this way: "Extensive knowledge and experience from existing facilities and wells will be incorporated into the new design, ensuring optimal integration and functionality." For the oil industry, CCS is an existentially important complementary business model. The expected decline in oil and natural gas consumption in the coming decades is leading these companies to alternative business models. CCS is one of the solutions to cover the turnover that will gradually be lost from oil and natural gas sales. If the process is also funded by the state, then the operational risk for these companies is naturally greatly reduced.	According to the latest data from the Global CCS Institute, there are 50 CO_2 storage projects in operation worldwide, with a further 630 in development. Therefore, there is no evidence to suggest that the method is controversial. Furthermore, regarding the comment author's assertion that *'...in other studies, the application of this method is controversial...'*, we cannot find any references in the otherwise extensive bibliography of the comment to examine the validity of this assertion. Furthermore, on the issue of the importance of CCS projects in national climate planning and in the corresponding EU policies, please refer to **Comment 19.10**. EnEarth has informed its social partners in the region and, following an invitation, has participated in information days organised by the Deputy Regional Authority of Kavala in Kavala and by the Technical Chamber of Eastern Macedonia in Thasos. It has also created a special website in Greek (www.enearth.earth/en) with detailed information about the project, where the entire Environmental Impact Study currently under consultation is posted. In addition, there are forms for contacting the company to answer any relevant questions. With regard to whether the project prolongs the use of fossil fuels, it should be noted that this will serve industries that are unable to reduce CO_2emissions through fuel switching (hard-to-abate industries), as these emissions are part of their production process. Such industries include cement, refineries, chemical industries, steelworks, fertiliser industries, etc. Firstly, it should be noted that the industrial sector in our country employs around 400,000 workers and contributes around €18 billion annually to the country's GDP. Consequently, it is easy to understand the socio-economic consequences for the country, workers and consumers if the industrial sector were to be burdened with excessive costs based on European policies and regulations for achieving climate neutrality. It is indicative that domestic industry emits around 15 million tonnes of CO_2per year and if it were now obliged to pay for all these emissions (as is planned to happen from 2035 onwards), it would incur costs of around **€1 billion per year, as the right to emit $CO_{(2)}$ is approximately €70 per tonne**. In other words, either industries would close down permanently or move to neighbouring countries where European climate policies or other similar national policies do not apply (such as Turkey, Egypt, etc.). On the contrary, the CCS project gives Greek industries with GHG emissions the opportunity to make the necessary adjustments in a less "violent" way and become climate neutral and economically viable at the same time. Moreover, the specific role of CCS projects is also recognised by the revised ESEK, which notes that *'...the development of CCS technologies and their possible extension to other sectors beyond those mentioned above increase the need for more storage space. Indeed, while dozens of new carbon storage facilities are currently being developed in Northern Europe, in the Mediterranean* ***there are few new projects and they are insufficient to cover even a small part of the carbon emissions of industries that cannot mitigate their emissions. For this reason, Greece is focusing on identifying new geological formations that are considered suitable for permanent $CO_{(2)}$storage****,with the competent Greek authorities, on the one hand, the Hellenic Hydrocarbon Resources Management Company (EDEYP) and the Greek Geological and Mining Research Authority (EAGME) to carry out the relevant research. Given that suitable geological formations are also found in other countries in the region, Greece will propose the reform of the relevant framework at European level so as to allow the development of storage facilities in non-EU Member States, while ensuring, of course, the necessary safety, environmental protection, monitoring and certification...".*
32.11	Lampros	Hellenic Petroleum	20/02/2025	Negative	It is unacceptable that natural gas companies are exempt from liability after a period of several decades (approximately 40 years) and that the high climatic and environmental risks of CO_2 sites are transferred to society. This means enormous costs for future generations. The wells will have to be monitored for centuries using sophisticated and expensive technology. Monitoring is costly, and even if we assume that we can verify that only pure $CO_{(2)}$ is actuallystored,the effects and the path that CO_2 will take in the rock formations, as well as the chemical reactions that will be caused in them, cannot be predicted with certainty by the models. We learned this from the Sleipner project in Norway (see Annex IV, page 16), which, as we can see here in Annex IV/Diagram 2, is not three or four kilometres from land, as in Prinos, but a proud 250 kilometres. One becomes very thoughtful when reading the Institute for Energy Economics and Financial Analysis'	Once a CCS project has been completed, **the operator** is responsible for monitoring, taking preventive and corrective measures, and sealing the storage site. The transfer of responsibility to the Competent Authority is only possible under specific conditions that ensure that the stored carbon dioxide remains completely and permanently isolated (see EU Directive 2009/31/EC, Articles 18, 19 and 20). Monitoring of the entire project (not just the boreholes) is carried out during operation, at closure and after closure. There are clear European laws, regulations, and obligations (see EU Directive 2009/31/EC on underground storage of $CO_{(2)}$). A strict measurement-monitoring-verification (MMV) plan is implemented from the start of operation until closure and beyond.

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					assessment of the Sleipner project entitled "Sleipner and Snøhvit CCS in Norway: Industry standards or cautionary tales?". Both projects are model projects in the field of CO_2 - pollutant storage. The main conclusions are as follows:xiii "Sleipner and Snøhvit demonstrate that carbon capture and storage is not without significant ongoing risks that may ultimately negate some or all of the benefits they seek to create." "Each project site has unique geology, so field operators must expect the unexpected, make detailed plans, update plans, and prepare for contingencies." "Ensuring the safe maintenance of storage requires a high level of preventive regulatory oversight, activities for which governments may not be adequately equipped." There are serious doubts as to whether the world has the technical capability, the power of regulatory oversight and the unwavering commitment of many decades of capital and resources required to keep carbon dioxide isolated under the sea – permanently, as the Earth needs –." If there are doubts in Norway about the existence of similar project oversight technology, how much more so will we have this technology in Greece? Here in Thassos, we are talking about our own backyard, not a project located 250 km away from our beaches. So why should we take on such a risk without us here in Thassos participating in the production of these pollutants? This waste is not ours. This does not help tourism! If we say "NO to CO_2in our backyard," we have everything to gain: us, the island, and tourism. Life teaches us that if something can go wrong, it will.xiv So why not rule out this risk? Why should Thassos become one of the guinea pigs?	In particular, it is recommended that the company proceed with the specification of the CO_2leakage monitoring programme, in accordance with its obligations, to ensure that any leakage that may occur can be immediately detected and addressed. According to EU Directive 2009/31/EC, CO_2 consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies that emit carbon dioxide and the company that receives it for storage to ensure that this requirement is met. The eligibility and suitability of a CO_2storage site is not determined by its distance from the coast, but by its geological, petrophysical and geomechanical characteristics, its impermeability and its storage capacity. There are CCS projects, such as those operating or under development in Norway, that are more than 100 km from the coast, not because they were chosen that way, but because there were many depleted hydrocarbon deposits there due to the large oil production in the North Sea since the 1970s, a wealth of data from their production history and, therefore, more proven technical options for implementing such projects in a short period of time. Sea since the 1970s, a wealth of data from their production history and, therefore, more technically proven options for implementing such projects in a short period of time. There are also similar projects in Europe that are much closer to the coast. Indicative examples include: • Porthos (Netherlands) 20 km from the coast. • Ravenna (Italy) 22 km from the nearest coast. • Norne (Denmark) onshore facility • Hynet (UK) 8.5 km from the coast. • Orion (UK) 46 km from the coast. With regard to the references in the Institute for Energy Economics and Financial Analysis report to the Sleipner and Snøhvit CCS projects in Norway, it should be noted that these summarise the knowledge, experience and lessons learned from the operation of these projects. Given that there is no precise knowledge of all the characteristics of the subsoil, as is also the case with hydrocarbon production, unexpected events may occur in practice. For this reason, CCS projects are 'built' gradually, with initially low injection rates. At this stage, the wells are tested, the movement of CO_2 within the reservoir is monitored, any changes in the environment are observed, and the full development of the project follows. However, as the report itself notes, both the technical capabilities for immediate problem detection and immediate remediation work are also available (see table of references for each case in the report). For the above reasons**, contingency plans** are also established**,** which are applicable in the event of any unexpected technical issues arising. until full restoration.
32.12	Lampros	HPP	20/02/2025	Negative	This project does not help, but rather damages the prestige and reputation of Thasos as the flagship of tourism in the AMTh region. What incentive would anyone have to spend their holidays in a luxury hotel near an industrial area that emits carbon dioxide? It is a fact that the Greek government has so far kept society in the dark about the costs associated with CCS and the serious risks to the environment, health and climate. All of these are part of the challenges faced by the residents of the area. We need a cost/benefit analysis covering decades to centuries and open and clear communication with residents, because the success of the project is closely linked to the degree of acceptance it receives and the benefits it will offer to society.	**Chapter 10** of the EIA thoroughly examines and evaluates the potential impact of the project on tourism in the area during the construction phase (**Section 10.2.5.4.1.2**), the operational phase (**Section 10.2.5.4.2.2**) and the decommissioning phase (**Section 10.2.5.4.3.2**). The conclusions of this EIA process are summarised as follows: • *In conclusion, during the construction phase, taking into account the results of the environmental impact assessment in this section of the EIA, it is estimated that the proposed Project* ***will not cause any significant adverse changes*** *to the sustainability of the tourism sector and, consequently, to the communities in the area that depend on this sector.* • *In conclusion, during the operational phase, taking into account the results of the environmental impact assessment in this section of the EIA, it is estimated that the proposed Project* ***will not cause any significant adverse changes*** *to the sustainability of the tourism sector and, consequently, to the communities in the area that depend on this sector.* • *In conclusion, during the decommissioning/cessation of operation phase, taking into account the results of the environmental impact assessment in this section of the EIA, it is estimated that the proposed Project* ***will not cause any significant adverse changes*** *to the sustainability of the tourism sector and, consequently, to the communities in the area that depend on this sector.* Finally, it should be noted that tourists still visit Thasos today, which is known for hydrocarbon extraction activities carried out at the same location where the proposed project will be implemented, which carry risks of accidents and disasters. Therefore, it is unclear why tourists would be discouraged by the operation of the CCS project, which, it should be noted, has a significantly lower probability of causing a serious accident or disaster than hydrocarbon extraction activities. With regard to the claim that "*the Greek government has so far kept society in the dark about the costs associated with CCS and the serious risks to the environment, health and climate*", it should be noted that in order to provide comprehensive information to local residents (and all interested parties), actions have been (and continue to be) implemented at three levels: • By the licensing and supervisory bodies of the central administration. More specifically, the Environmental Impact Assessment (EIA) for *the "CO_2 in* Prinos" was duly forwarded by the Environmental Licensing

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						Directorate (DIPA) on 23 December 2024 for publication and consultation to **the Regional Council of Eastern Macedonia - Thrace** and **other public bodies and services,** for publication in the context of the start **of the consultation and public information process,** while at the same time the EIA has been made available (open access) in the Electronic Environmental Registry (EER) (this public consultation was completed on 25 February 2025).Furthermore, the President of the Regional Council, in a letter dated 14 January 2025, sent a notice to the website of the Region of Eastern Macedonia and Thrace (https://www.pamt h.gov.gr/m-p-e-toy-ergoy-monada-apothikeysis-co2-ston-prino/) and invited the interested public to take note and submit written opinions in the context of the launch of a public consultation on the content of the EIA file for the project "CO_2 in Prinos" until 14 February 2025. The above actions and measures show that the applicable procedure and actions required to inform the local community and allow it to express its views have been followed. • By institutional bodies in the local and wider area. For example, information days were organised by the Deputy Regional Authority of Kavala in Kavala and by the Technical Chamber of Eastern Macedonia in Thasos. • By the project operator. EnEarth has informed its social partners in the region and has also created a special website in Greek (www.enearth.earth/en) with detailed information about the project, where the entire Environmental Impact Study currently under consultation is posted. In addition, there are contact forms available for the company to answer any relevant questions. Recently (April 2025) the project operator provided additional information on the project with the official announcement of the signing of a Memorandum of Understanding with Kavala Solutions, which operates in Nea Karvali, the former Phosphate Fertiliser Industry, for the storage of all carbon dioxide emissionsfrom the Blue Ammonia production unit in the Prinos storage area. For the benefits of the project to the local community (and beyond), see **Comment 32.2** and for more details, see **Section '4.1.3 Expected Benefits at Local, Regional and National Level'** of the EIA.
32.13	Lampros	HPP	20/02/2025	Negative	The lack of information, combined with the low maturity of the technology, raises a number of concerns, which can be summarised in the following categories: **Conflicts of use of the environment** Tourism: The beaches of Thassos are among the most popular holiday and leisure destinations in the Region of Eastern Macedonia and Thrace and in Greece. Further industrialisation of the coastal area and damage to the marine environment would also be detrimental to tourism. The huge number of overnight stays provides numerous jobs and income for the island, which are now at risk. How is the compatibility of CO2 storage in Prinos with the island's tourism development clarified? Have studies been conducted on the compatibility and coexistence of the tourism portfolio with long-term burial, and which tourism factors were taken into account?	According to the most recent data from the Global CCS Institute, there are 50 $_{CO2}$ storage projects in operation worldwide, with an additional 630 in development. Therefore, there is no evidence of the *"low maturity of the technology"*. For information on the actions taken to inform local residents (and all interested parties), please refer to **Comment 32.12.** The comment probably deliberately refers to $_{CO_2}$as a "pollutant" and its storage process as "long-term burial", which are not accurate references. For more details on this issue, please refer to **Comment 32.6.** For the issue of the impact on tourism, see **Comment 32.12.** The authors of this Memorandum are not aware of the existence *of "studies on the compatibility and coexistence of the tourism portfolio with long-term burial*," however, the compatibility of the project with the spatial planning regime of the study area (including tourism and related uses) has been examined in detail in **Chapter 5** of the EIA, as specified by the relevant legislation on the contents of Environmental Impact Studies (in accordance with the specifications set out in Annex 2 of Joint Ministerial Decision 170225/2014, as currently in force).
32.14	Lampros	HEM	20/02/2025	Negative	How has the Municipality of Thasos participated in the CO_2sequestration project in Prinos so far, and what is its position on the issue? What will be the role of the Municipality of Thasos in the upcoming consultation? What campaign are the Municipality of Thasos and the Tourism Organisation launching to limit the damage caused by CO2 emissions to the image of tourism and to inform residents and visitors?	The consultation principles during the EIA process are defined in Joint Ministerial Decision 1649/45/2014 "*Specification of the procedures for issuing opinions and informing the public and the participation of the interested public in public consultation during the environmental licensing of projects and activities of Category A of the decision of the Ministry of Environment, Energy and Climate Change No. 1958/2012 (Government Gazette 21/A), in accordance with the provisions of Article 19(9) of Law 4014/2011 (Government Gazette 209/A), as well as any other relevant details,*" as currently in force. It should be noted that the Municipality of Thasos has participated in the public consultation on the EIA for the project and its comments are included in **section 43** of this Memorandum. The other questions raised in this section of the comments are not covered by the EIA and will therefore not be answered in this Memorandum.
32.15	Lampros	HIM	20/02/2025	Negative	With regard to tourism, the EIA starts, as in most of its estimates, from the best case scenario and does not expect any restrictions or negative impacts on existing tourism activities. In other words, it does not expect any significant negative secondary effects on tourism or reduced income in this productive sector. In any case, however, the EIA lacks the impacts of a real case or worst case scenarios for as long as $CO_{(2)}$pollutants remain in the wells.	The EIA thoroughly and in depth analyses any potential impacts on the natural and man-made environment of the study area (including those on tourism and the socio-economic environment), both from the normal operation of the project and from possible accidents and unforeseen events, as well as from climate change (**Sections 10.2, 10.4** and **10.5** of the EIA). Consequently, both the impacts from the normal or usual operation of the project (**Section 10.2),** which constitute the **real case scenarios,** and those from potential accidents, unforeseen events and climate risks (**Sections 10.4** and **10.5** respectively), which obviously constitute the **worst case scenarios.** The application of the EIA procedure to all phases of the project's life cycle (construction, operation and decommissioning) shows that no significant adverse impacts on tourism and the socio-economic environment are expected (as in the other P&K Parameters of the study area).

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32.16	Lampros	EPM	20/02/2025	Negative	Protection of Wells Before a geological structure is used as a CO_2storage site, will the possibility of exploitable oil or natural gas deposits in the area of influence of the CO_2storage site be ruled out, or will there be parallel use?	When a geological site (depleted hydrocarbon deposits) is selected for underground carbon dioxide storage, no more oil or natural gas is produced. However, if there are exploitable hydrocarbon deposits in the wider area that are not affected by $CO_{(2)}$storage,they continue to operate without interruption.
32.17	Lampros	HMP	20/02/2025	Negative	Studies xv show that the effects of CO_2injection into saline aquifers remain significant at distances of approximately 100 kilometres and can therefore reach the mainland. Consequently, the saline waters of the formations could also be compressed upwards and penetrate the underground aquifers containing fresh water, salinising them and rendering them unusable for human consumption. How can this risk be ruled out when Thasos is only a few kilometres from the wells and a large part of the drinking water is pumped from boreholes?	The communication or lack thereof between deep hypersaline aquifers and shallower aquifers (potable or irrigable) depends on the geology of the area. The sediments of the Prinos basin are confined to its boundaries, in the marine area of the Gulf of Kavala, and do not extend into the subsoil with the shallow onshore aquifers for use. Furthermore, it is important to note that the aquifer targeted for CO_2storage is subject to the acidic Prinos oil deposit, at a depth of 3 kilometres. Therefore, if the logic of the argument in this comment were valid, the aquifers of Thasos should have been contaminated with oil and hydrogen sulphide many years ago, which obviously has not happened and therefore cannot happen in the case of the proposed CCS project either.
32.18	Lampros	HIM	20/02/2025	Negative	Leaks acidify the water. Acidification leads to local impoverishment of biodiversity. Only a few species survive with high CO_2content. If fish breeding habitats are destroyed and food chains are damaged, we would cause serious damage to coastal and deep-sea fishing. How can this risk be ruled out for hundreds of years? xvi	The possibility of CO_2leakage and the potential **acidification of seawater** has been thoroughly examined in the project's EIA. More specifically, the potential impacts of seawater acidification have been examined: • As part of the assessment of the potential impacts arising from the vulnerability of the project under study to **the risk of serious accidents or disasters** (**Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'**). The potential P&C from seawater acidification are examined for all P&C parameters of the study area (indicatively **Sections 10.4.5.5 Impact on the Aquatic Environment, 10.4.5.8 Impact on the Biotic Environment,** etc.). • As part of **the Sensitivity, Exposure and Vulnerability to Climate Change analysis** (**Section '10.5** IMPACTS FROM EXPECTED CLIMATE RISKS'). In addition, the potential P&K from seawater acidification are also examined in detail in the Special Ecological Assessment Study (SEAS), which is an integral part of the project's EIA. This analysis, both in the context of the EIA and the SEAS of the project, shows that no significant adverse effects are expected in the event of seawater acidification (an event that is extremely unlikely to occur and would have a limited spread if it did occur).
32.19	Lampros	HPP	20/02/2025	Negative	**Geology of Wells** Geochemical Study EnEarth states in the EIA that it commissioned a "Geochemical Study to assess the geochemical reaction of CO_2 with the minerals of the rocks and fluids of the geological formation, which showed that the expected geochemical changes will be minimal as a result of the characteristics of the geological formations in the study area. Therefore, it is estimated that $CO_{(2)}$injection injection will not have an impact on the minerals in the rocks and fluids in the geological formation and, therefore, the relevant impact on the geological formations in the study area during the operation of the project's onshore and offshore facilities will be neutral"(Page 10-82,930). Have these results been reviewed by NEUTRAL experts? Where can we see this study?	As part of the "Application for CO_2 in the Prinos deposit," a series of technical studies and simulations were prepared and submitted to the competent state agency (EDEYEP) documenting, among other things, the suitability of the site and the safety of the CO_2storage process.Among these studies was the **"Geochemical Study"** evaluating the geochemical reaction of CO(2) with the minerals of the rocks and fluids of the geological formation, which has been evaluated by specialised staff of the competent authority. The EIA includes its conclusions, as on the one hand there is no requirement to include it in the project's EIA (nor would it be useful), and on the other hand, due to its highly technical nature, this study is approved by specialised scientific personnel and is not subject to public consultation. Therefore, as stated in the EIA, the **Geochemical Study** evaluating the geochemical reaction of $CO_2$with the minerals of the rocks and the fluids of the geological formation showed that the expected geochemical changes will be minimal due to the characteristics of the geological formations in the study area. Therefore, it is estimated that CO(2) injection will not have an impact on the minerals of the rocks and fluids of the geological formation and, therefore, the relevant impact on the geological formations of the study area during the operation of the project's onshore and offshore facilities will be **neutral**.
32.21	Lampros	HPM	20/02/2025	Negative	High leakage risks When CO_2 is injected, there is a high risk of it escaping through cracks or weak points in the rock layer. Storing large quantities could increase the pressure excessively and jeopardise the stability of the storage facilities. Erosion and other geological factors could even widen these cracks and make CO_2 storage unsafe (see Annex IV, Figure 1, Page 16). If this is the case at the Sleipner project, as confirmed by Greenpeace Germany and other institutes, how can you justify EnEarth's assessment on page 4-30(243)xvii that these risks will not exist in Prinos and that the Prinos basin will remain a tectonically stable area for the next 10,000 years, as the study claims, and assesses this environmental parameter as moderate and not of high importance?	Through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos reservoir", the movement of the CO_2 plume over time is presented in detail. In addition, the historical evolution of the reservoir pressure is presented in detail. These studies have also calculated the future change in pressure due to the injected quantities of carbon dioxide, as well as the safe limit above which cracks may open. Consequently, the behaviour of the reservoir in response to pressure changes that could lead to the opening of fractures has been thoroughly studied and the safe limit has been taken into account in the design of the project. With regard to references to the Sleipner CCS project, it should be noted that these summarise the knowledge, experience and lessons learned from the operation of such projects. Given that there is no precise knowledge of all the characteristics of the subsoil, as is also the case with hydrocarbon production, unexpected events may occur in practice. For this reason, CCS projects are 'built' gradually, with initially low injection rates. At this stage, the wells are tested, the movement of $CO_{(2)}$ within the reservoir is monitored, any changes in the environment are observed, and then the project is fully developed. However, as the report itself notes, both the technical capabilities for immediate problem detection and immediate remediation work are available (see table of references for each case in the report). For the above reasons**, contingency plans** are also established, which are applicable in the event of any unexpected technical issues arising, until full restoration is achieved.

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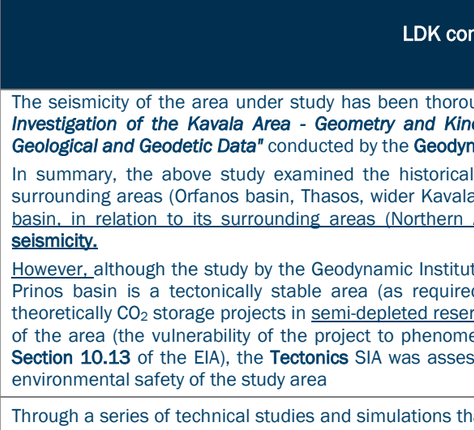
						The seismicity of the area under study has been thoroughly investigated in the study entitled ***"Seismotectonic Investigation of the Kavala Area - Geometry and Kinematics of Active Structures based on Seismological, Geological and Geodetic Data"*** conducted by the **Geodynamic Institute of the National Observatory of Athens**. In summary, the above study examined the historical and instrumental seismicity of the Prinos basin and surrounding areas (Orfanos basin, Thasos, wider Kavala area). According to the study's conclusions, the Prinos basin, in relation to its surrounding areas (Northern Aegean, Chalkidiki, etc.), is characterised by **reduced seismicity.** However, although the study by the Geodynamic Institute of the National Observatory of Athens shows that the Prinos basin is a tectonically stable area (as required for CO_2 in terms of tectonic (seismic) activity), as theoretically CO_2 storage projects in semi-depleted reservoirs may, under certain conditions, affect the tectonics of the area (the vulnerability of the project to phenomena related to the tectonics of the area is examined in **Section 10.13** of the EIA), the **Tectonics** SIA was assessed as being of **moderate** importance, in favour of the environmental safety of the study area
32.22	Lampros	HEM	20/02/2025	Negative	EnEarth reports that "higher injection rates may increase pore pressure and the risk of seismicity. In the case of the Project under study, the risk of induced seismicity is minimal" ( ).(Page 10- 83,931). How can EnEarth rule out a change in tectonic developments in the area over the next 100, 200 or 1,000 years?	Through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos reservoir", the historical evolution of the reservoir pressure is presented in detail . These studies also calculate the future change in pressure due to the injected quantities of carbon dioxide, as well as the safe limit above which cracks may open. Consequently, the behaviour of the reservoir in response to pressure changes that could lead to induced microseismicity has been thoroughly studied and the safe limit has been taken into account in the project design. As artificial recharge is expected to continue until 2049, no change in the tectonic stress regime is expected after 2049 as a result of this activity.
32.23	Lampros	HMP	20/02/2025	Negative	Low effectiveness of commitment mechanisms We read in studies xviii that various theoretical mechanisms, such as the dissolution of CO_2 in the water of storage rock formations, have not yet been proven in reality. Models that depict this sequestration as "safe" are often based on unrealistic assumptions. What were the relevant results in Prinos?	Carbon dioxide is trapped within the geological formation by the following mechanisms: 1. Structural and stratigraphic trapping 2. Dissolution in **existing water and** miscibility in **oil** 3. Mineralisation (formation of stable minerals) 4. Residual trapping **due to capillary forces** The last three mechanisms permanently trap CO_2, which cannot be moved. For the Prinos project, more than 30% of the total injected volume of carbon dioxide remains unable to move within the reservoir (details are provided in the studies prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for $CO_{(2)}$ Storage in the Prinos Reservoir"). The temporal evolution of the mechanisms is presented in the following diagram (the mechanism that develops later in time is the mineralisation of CO_2).  The dissolution of carbon dioxide in water is not a theoretical approach; it has been the subject of scientific research for many decades and has been resolved both experimentally and computationally.
32.24	Lampros	HPM	20/02/2025	Negative	Risk to the environment and climate The high energy and resource consumption of CCS constitutes a significant intervention in the environment. In addition, CCS could indirectly release climate-damaging	The energy consumption of the proposed project and the related GHG emissions have been calculated in detail in **Section 4.5 CARBON FOOTPRINT OF THE PROJECT** of the EIA. The corresponding calculations show that the relevant emissions are **negative** and are considered **stable** and equal to **869.175 tn $CO_{(2\ eq)}$per year.** Therefore, it does not appear that the project *"could indirectly release climate-damaging substances such as methane, which would negate the positive effect of CO_2 storage on the climate".* Furthermore, it is not substantiated why *the*

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					substances such as methane, which negates the positive climate impact of CO_2 storage. What were the relevant results in Prinos?	*operation of the project would lead to indirect emissions, specifically of methane, capable of negating* the positive effect of CO_2 storage on the climate. The above is not clear to the authors of this Memorandum, so that they can answer the relevant questions. Furthermore, it is not clear what resources the project will consume and constitute a "*significant intervention in the environment*".
32.25	Lampros	Lampros	20/02/2025	Negative	Underestimated blowout risks: Many studies point to the risk of so-called "sudden blowouts". These are sudden, uncontrolled releases of CO_2 that can occur due to pressure build-up. Such events could release large amounts of stored CO_2 and even carry other dangerous gases with them. How many centuries do the simulations of the subsoil, including the underlying aquifer, give a stability of the overlying cover? What method was used to estimate the potential storage capacity of the rocks and how were the uncertainties in the parameters required for the capacity assessment taken into account? Was a Monte Carlo Simulation performed? How will the potential risks of CO2 injection into the ground be made known to the general public and how will the impermeability of CO2 storage facilities be proven? Given that the current state of knowledge is so uncertain, does the precautionary principle alone prohibit the use of CCS?	Through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos deposit," the methodologies used to estimate the storage capacity of the geological formation and the three-dimensional reservoir simulation modelling packages used are presented in detail. Both the methodologies and the simulators used are widely used tools for similar subsurface studies worldwide. are costly and their application requires a particularly long period of time in order to study all the data and achieve reliable results. It should be noted that some of the studies and simulations carried out (which have been submitted to the competent administrative authorities for the evaluation and licensing of the project under study) include, but are not limited to, Monte Carlo Simulation and other statistical methods. The study and assessment of the potential risks of CO_2into the ground and proof of the integrity of the CO(2) storage facilities are included in the studies prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO(2) Storage in the Prinos Reservoir. The findings and conclusions of these technical studies and simulations, concerning the potential risks of $CO_{(2)}$injection into the ground and proof of the integrity of the $CO_{(2)}$storage facilities, are included in the project's EIA. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure.
32.26	Lampros	EIA	20/02/2025	Negative	Technical Questions Monitoring/Blow-Out/Monitoring: During the project and for centuries after storage operations, the space occupied by CO_2pollutants in the wells must be monitored for permanent impermeability. These monitoring programmes and plans do not yet exist. Why is the state taking this risk? Does the Greek state have the necessary expertise to comply with existing EU standards? EnEarth will begin storage as early as 2025. How will the storage systems be monitored? Is there a technical monitoring plan? The study states that international personnel with proven experience in the development of similar fields will be recruited. xix	Monitoring programmes and plans are available and are already being implemented effectively in countries that have incorporated this specific know-how into their planning and are constantly evolving within the EU framework. According to EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a system of corrective measures are an integral part of the CO_2 at the Prinos storage site and their **prior approval** by EDEYEP and the competent EU climate directorate is a prerequisite for the **completion of the licensing process**, which is fully covered by a study conducted by an international firm with experience in the relevant field. In accordance with EU and national law, the monitoring programme is fully implemented both during all years of operation of the storage site and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take account of changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology.
32.27	Lampros	HMP	20/02/2025	Negative	Blowouts also occur occasionally in offshore drilling. However, controlling these blowouts at sea is much more difficult than on land. There are still some blowouts today that have not yet stopped and remain active. How do we proceed here? Will there never be another blowout in the coming centuries?	**It is important to note that CO_2 is neither flammable nor explosive, meaning that the risk of explosion during injection is negligible**. However, in line with best practice and regulatory requirements, appropriate safety measures will be taken. These include safety valves below the seabed (within the well) and automatic emergency shut-off mechanisms designed to control the well in the event of any unexpected integrity issues. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to major accident or disaster hazards, please refer to **Section '10.4 IMPACT OF THE PROJECT'S VULNERABILITY TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** in the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. During the drilling phase, explosion risks will be addressed using industry standard procedures similar to those applied in all drilling operations in the region and worldwide. Key measures include the use **of blowout preventers (BOPs),** the correct selection of drilling mud weight, adherence to established drilling procedures and the implementation of a comprehensive emergency response plan. These precautions ensure safe and controlled operation at every stage of the project. In any case, for a more detailed presentation of risk prevention/minimisation and response measures, please refer to **the** relevant **Section '11.1 MEASURES FOR RISK PREVENTION AND MANAGEMENT'** of the EIA.
32.28	Lampros	HMP	20/02/2025	Negative	How will EnEarth and the state ensure that CO2 is separated at source and that no residues other than CO2 are stored? What measures/efforts will be taken to eliminate this risk?	The CO_2stored under the proposed project must meet specific requirements as set out in the relevant EU Directives (for example, DIRECTIVE 2009/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC and 2008/1/EC, and Regulation (EC) No 1013/2006) and Quality Standards (indicatively ISO 27913:2024 'Carbon dioxide capture, transportation and geological storage — Pipeline transportation systems').

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						According to EU Directive 2009/31/EC, the CO_2stream consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies involved that emit carbon dioxide and the company that receives it for storage to ensure this requirement is met.
32.29	Lampros	LMP	20/02/2025	Negative	To what extent has it been investigated whether the old boreholes pose a risk of leakage? Are they all known and safe? Are there protocols in place? What does the Municipality of Thasos know?	The integrity review for all Prinos boreholes has been completed and the relevant findings have been incorporated into the project design, as presented in detail in the project's Environmental Impact Study. As part of the monitoring, measurement and verification (MMV) plan, abandoned wells will be subject to monitoring and continuous measurement. In addition, the wells considered to be at greater risk have been identified for exclusive real-time monitoring and continuous assessment throughout the project. In addition, there will be **a** specific **intervention plan** in case of any unexpected phenomena. The above is in line with industry procedures and best practices to ensure that no unexpected events occur, maintaining the safety and integrity of operations.
32.30	Lampros	HMP	20/02/2025	Negative	Of course, $CO_2$is corrosive, and the question is how it will be introduced. Will this be done by replacing the intake pipes (completion) with other pipes that are resistant to dioxide, or will the Company remain with the existing system for economic reasons?	As part of the proposed project, as described in detail in **Chapter 6** of **the EIA, new wells** will be constructed for CO_2injection and water production. These wells will be designed with the appropriate metallurgy to ensure durability and integrity, withstanding any corrosive environment that could arise from the presence of $CO_{(2)}$. The selection of materials, which will follow industry best practices and regulatory standards to ensure long-term performance and safety, is the subject of the project's technical studies (and approval by the relevant competent services of the central administration) and are not covered by the Environmental Impact Study.
32.31	Lampros	HMP	20/02/2025	Negative	Abandoned wells: How is the deterioration of wells controlled, which may be the result of corrosion of the casing and reactions of minerals with various materials that jeopardise the integrity of the well?	The abandoned wells have been completed using materials and equipment specifically selected to withstand the reactions of minerals in the Prinos reservoir and ensure long-term integrity. In addition, during the CO_2 injection phase, there will be a comprehensive monitoring plan in place to continuously evaluate the field and identify any anomalies in a timely manner. Pressure and temperature monitoring, as well as $_{CO_2}$ saturation,will be carried out using sensors to detect any unexpected changes that may indicate deviations in the integrity of the well.
32.32	Lampros	HPC	20/02/2025	Negative	Who will be responsible in the event of accidents? Who pays and to what extent in such a case of destruction?	According to existing EU and national legislation, the risk, i.e. the liability, of an 'accident' (whatever this general term may encompass) is borne both during the operation of the facility (i.e. for up to 25 years initially, years, but also for any extension, if the capacity of the storage facility allows it) and for an additional period of 20 years after the closure of the facility**.** After 20 years have elapsed since closure and provided that all available data indicate that the stored CO_2 will be kept completely and permanently isolated (Article 18 of the relevant Directive 2009/31 of the European Parliament and Article 19 of the existing national legislation), the storage facility shall be handed over to **the competent authority (Greek State)**.
32.33	Lampros	HMP	20/02/2025	Negative	Why is the state taking on all these risks in a tectonically active area such as the Aegean?	This comment does not concern the contents or jurisdictional issues of the EIA. Therefore, it does not need to be answered in the context of this Memorandum.
32.34	Lampros	Hellenic Ministry of Environment and Energy	20/02/2025	Negative	What kind of CO_2will we pressurise in the final storage site in Prinos? From every kind of industry, every country? Why not just pollutants from Greek industry? In other words, we have driven Greek industry out of the AMTh region and instead we will import and store pollutants from industries in other countries?	The CO_2 to be stored under the proposed project must meet specific requirements as set out in the relevant EU Directives (for example, DIRECTIVE 2009/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC and 2008/1/EC, and Regulation (EC) No 1013/2006) and Quality Standards (indicatively ISO 27913:2024 'Carbon dioxide capture, transportation and geological storage — Pipeline transportation systems'). According to EU Directive 2009/31/EC, the CO_2stream consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies that emit carbon dioxide and the company that receives it for storage to ensure that this requirement is met. The other questions raised in this Comment do not concern the content or jurisdictional issues of the EIA. Therefore, they do not need to be answered in this Memorandum.
32.35	Lampros	HMP	20/02/2025	Negative	**General Questions** Is this greenwashing, i.e. a superficial solution? Are we labelling storage as a green process when in fact it is not? For example, if we continue to burn fossil fuels and bury the pollutants in Prinos, what have we gained? Does this help the green transition or is it a tool of the Brussels Green Deal to bury funds?	CCS projects are included in the proposed measures to achieve climate neutrality, both in the context of national strategies and in the context of European policies. It should be noted that the implementation of Carbon Capture and Storage (CCS) projects is a technical/regulatory/economic measure with code **'M38'. Decarbonisation of industry through the promotion of carbon capture and storage (CCS) technologies,** with the aim of "Reducing emissions in the industrial sector" of the revised NECP. It should also be noted that the European Parliament has included investments in carbon capture and storage in the EU list of "**green" investments, known as the EU Taxonomy, while on the other hand it has included the relevant technologies in the Strategic Technologies for Europe Platform (STEP).** According to Article 2(1) of the STEP Regulation, clean and resource-efficient technologies

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					To avoid greenwashing, why don't we make it a condition and a priority that this type of storage in Prinos is only available for technologies that cannot do without carbon dioxide in the production process, e.g. the cement industry, etc.?	include zero net emission technologies as defined in Article 4 of the NZIA. The **NZIA** Regulation is Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13June 2024, establishing a framework for measures to strengthen Europe's net-zero emission technology ecosystem and amending Regulation (EU) 2018/1724'. Article 4 of the NZIA, which presents the "List of net-zero emission technologies", also includes "Carbon capture and storage technologies". It follows from the above that the comment's assertion that CCS projects promote "*greenwashing*" is in no way valid. On the contrary, the international scientific community and the relevant national and European institutional authorities evaluate CCS projects as "green investments" using clean and resource-efficient technologies, prioritise and subsidise them, recognising that they are currently the most effective, safe and cheapest method of reducing carbon dioxide emissions. The other questions raised in this Comment do not concern the content or jurisdictional issues of the EIA. Therefore, they do not need to be answered in this Memorandum.
32.36	Lampros	HMP	20/02/2025	Negative	Can we proceed on the basis of the Bow-Tie Method used (pages 10-32, 880) to assess the risks, a method based entirely on the judgement of experts in the field? Why should society start from the working assumption that these assessments are objective? There is no data on the long-term geological storage of CO_2. Therefore, no one can objectively calculate this risk.	The Bow-Tie method is a diagrammatic representation of potential risks, causes, consequences, control measures and the effectiveness of those measures. The use of the Bow-Tie method significantly improves safety and provides a clear and accessible way of implementing best practice in risk management. It is a reliable preventive approach and an effective safety management tool. However, the risk assessment, as summarised in Section 10.4 of the EIA, has not been based entirely on the judgement of experts in the field, but on internationally recognised reliable methodologies, as described below. According to paragraph 3 of Article 5 of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) *"Measures and conditions for the storage of carbon dioxide in geological formations...–Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006"*, a geological formation shall be selected as a storage site only if, under the proposed conditions of use, there is no significant risk of leakage or significant risk to the environment or health. The risk assessment was carried out in the context of the application submitted by EnEarth to EDEYEP on 30 June 2024 (Ref. No. 22781/EDEYEP) in order to determine the suitability of the geological formation as a CO_2 , based on Article 173 of Law 4964/2022, and follows the content specified for Phase 3.3 of the assessment of the proposed storage complex in Annex I of Joint Ministerial Decision 48416/2037/E.103/2011. The risk assessment includes, among other things, the following: i. **Risk investigation** through the investigation of potential leakage events from the storage complex. In this context, the following are examined, among other things: a) possible leakage routes. b) the possible magnitude of leakage events for identical leakage routes (flow rates). c) critical parameters affecting potential leakage. d) the secondary effects of CO_2storage, including displaced formation fluids and new substances that may be created by CO_2storage. (e) any other factors that may pose a risk to human health or the environment (such as natural structures associated with the project). ii. **Exposure assessment** — based on the characteristics of the environment, the distribution and activities of the human population above the storage complex, and the behaviour and fate of CO2 leaking from potential pathways. iii. **Effects assessment** — based on the sensitivity of specific species, communities or habitats associated with potential leakage events (point (i)). iv. **Risk characterisation** — assessment of the safety and integrity of the site, in the short and long term, including an assessment of the risk of leakage under the proposed conditions of use and the environmental and health impacts in the worst-case scenario. For risks related to the subsoil, a comprehensive risk assessment was carried out using the bowtie analysis method to estimate the probability and potential quantities of leakage from various potential leakage routes. Based on the probability of failure for each means of protection, the bowtie analysis included a **semi-quantitative risk assessment (SQRA)** to estimate the probability of leakage for each different route. The estimation of leakage rates and rates as a percentage (%) of the total mass of $CO_{(2)}$injected was determined in accordance with the

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						guidelines of the UK Department of Energy and Climate Change report (2012), according to which leakage rates along escape routes such as fractures or boreholes can be estimated based on the total injected mass of CO_2. Similarly, the Geographical Range of Potential Risks presented schematically in **Section 10.4** for each accident scenario is based on simulations using quantitative data rather than expert judgement. Therefore, it is particularly important to note that the risk analysis for the risks associated with the implementation and operation of the proposed project has been based, where possible, on quantitative and semi-quantitative methods, which, in combination with the judgement of the EIA experts and the technical studies of the project, led to the risk assessment.quantitative methods, which, in combination with the expert judgment of the EIA and technical studies of the project, led to the risk assessment for all project elements and for its entire life cycle.
32.37	Lampros	EIA	20/02/2025	Negative	So, is this method technologically dangerous and does it serve as an excuse for companies to continue burning fossil fuels? Currently, in Germany, no permits can be issued for CO2 storage on land or at sea. What is prompting the Greek government to allow storage in Prinos?xxi	Relevant simulations have been carried out for these specific risks, which concern both technical studies that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos deposit, as well as in the relevant chapters of the project's EIA. For a detailed presentation of the risks related to the Project facilities and the possible impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **the** relevant **Section '10.4 IMPACTS ARISING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. In addition, it should be noted that if there were a significant risk of CO_2 from the geological formation, both oil and methane, other hydrocarbons in the gas phase, hydrogen sulphide and CO_2 currently produced together with oil would have already escaped. The CO_2 storage method is primarily aimed at industries in which $CO_2$is released from chemical processes. One such chemical process is cement production. In cement production, the raw material, hot calcium carbonate ($CaCO_3$), produces calcium oxide (CaO) and carbon dioxide, which is released into the atmosphere. **Even if the heat required for this chemical reaction is produced by an electric heater which in turn is powered by renewable energy (i.e. with no fossil fuels involved), CO_2 because it is a product of the reaction $CaCO_3$ ->$CaO+CO_2$.** In fact, Germany had initially only allowed the development of experimental CO_2storage facilities,considering that otherwise the development of CCS chains might be contrary to efforts to promote the penetration of renewable energy sources. However, this direction has changed over the last two years. The **new Coal Strategy in Germany allows the storage of carbon dioxide produced by industries as part of the production process. Recently (March 2025), the European Commission approved €5 billion in state aid for the decarbonisation of German industry, including through the creation of carbon capture and storage chains.**
32.38	Lampros	HCM	20/02/2025	Negative	**Summary of risks** **The technology has not been adequately tested.** The number of CCS projects that have actually been implemented is surprisingly low, and the failure rate is quite high. Thasos is to be used as a test case at a time when we have closed down factories in our region. Why should we collect pollutants from all over southern Europe? To maximise Energean's profits?	The injection of carbon dioxide into hydrocarbon deposits is not a recent development. It has been practised since the 1970s, mainly in the United States and Canada, where it is used to increase oil production (EOR method). In this methodology, a small percentage (about 30%) of the injected carbon dioxide is trapped and remains in the reservoir, while the rest is extracted with the oil and recycled. The behaviour of carbon dioxide and its interaction with the reservoir fluids is similar to what happens in a CCS project in depleted hydrocarbon reservoirs. The difference lies in the fact that in such a CCS project, water is produced instead of oil, thus creating space for CO_2storage and preventing pressure build-up. According to the latest data from the Global CCS Institute, there are 50 CO_2 storage projects in operation worldwide, with a further 630 in development. Similarly, more than 40 projects with a capacity of 140 million tonnes per year are under development in Europe, with the aim of becoming operational by 2030 (19 projects in EU countries, with a capacity of 42 million tonnes per year by 2030). Therefore, there is no evidence to suggest that *'the number of CCS projects that have actually been implemented is surprisingly low, and the failure rate is quite high'*. Furthermore, this part of the comment incorrectly refers to CO_2as a pollutant. $CO_2$is neither a pollutant nor a waste product, but a greenhouse gas, i.e. it contributes to the retention of solar radiation in the atmosphere, resulting in an increase in temperature. However, this property does not make it a pollutant. Carbon dioxide is a natural component of the Earth's atmosphere and plays a crucial role in the carbon cycle, a process that maintains the balance of gases in the atmosphere. CO_2 is produced naturally by processes such as respiration, decomposition and volcanic eruptions, and is an integral part of the process of photosynthesis. Plants absorb CO_2 and use it to produce oxygen. This relationship actually helps regulate CO_2 levels in the atmosphere. Unlike pollutants such as sulphur dioxide (SO_2) or nitrogen oxides (NOx), which have direct harmful effects on human health and the environment, CO_2 is not toxic. Concerns about CO_2 are mainly related to **climate change** and not to its direct toxicity. The amount of CO_2in the atmosphere must therefore be regulated for its climate impact (as part of efforts to limit global warming) and not because it has direct environmental or health effects. Climate change does not affect a specific location but the entire planet. Failure to combat CO_2 from Southern Europe and the associated climate change will have the same negative effect on Thasos as it will on Kavala, Eastern Macedonia, Thrace, Greece, the Mediterranean and ultimately the entire planet.
32.39	Lampros	HUM	20/02/2025	Negative	**CCS technology is and remains expensive:**	For the answer to this question, please refer to **Comment 32.4.**

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					The capture and final storage of CO_2 is costly and energy-intensive.	However, it should be noted that co_2 emissions into the atmosphere are significantly cheaper than capture and storage in the short term. However, the effects of climate change, although they seem distant, are much more painful as they endanger or even take human lives, and dealing with them is extremely costly. The following incidents are indicative of the effects of climate change • **Fires in Australia (2019–2020):** 33 victims, the destruction of 3,000 homes and 10 million hectares. Wildlife casualties were estimated in the billions. • **Cyclone Amphan (May 2020):** Affecting India and Bangladesh, Amphan caused 129 casualties and displaced millions of people. Economic damage was estimated at $14 billion. • **Atlantic Hurricane Season (second half of 2020 and 2021):** A record number of storms caused at least 400 deaths and $41 billion in damage on the American continent, making it the most expensive storm season in history. Hurricane Ida in 2021, in Louisiana, caused at least 95 deaths and damage exceeding $65 billion, affecting several states. • **Floods in Europe (July 2021, September 2023, October 2024):** Severe flooding in Germany and Belgium caused over 200 deaths and extensive damage. Storm Daniel in Thessaly claimed 17 lives, with another 350 deaths in subsequent months, and caused extensive damage exceeding €5 billion. Finally, severe flooding in the Valencia region claimed over 219 lives, left 19 people missing and caused damage exceeding €30 billion. • **Fires in California (Summer 2023 and Winter 2025):** Dozens of deaths, destruction of thousands of homes and damage amounting to tens of billions of dollars. Similarly, the process of capturing, transporting and storing $CO_2$is obviously more energy-intensive than direct release into the atmosphere. The energy requirements for the entire CCS chain depend in particular on the capture technology and the means of transport (ship, pipeline). The storage process has lower energy requirements than capture. For the entire chain, energy requirements can range from 150 to 450 GWh per year, depending on the technology. This corresponds to the energy produced by a conventional power plant of 20-50 MW or the energy produced by 14-40 wind turbines of 5 MW. Both the Greek industry that will use the storage facility and EnEarth are planning to sign long-term contracts for the purchase of energy from RES, so not only will the cost of covering energy needs be minimal, but the development the chain will also contribute to the absorption of discarded RES energy. Indicatively, it is noted that discarded RES energy in 2024, i.e. energy that was 'suppressed' and not consumed, was 860 GWh, which is much more than the energy needs of a $CO_{(2)}$chain.However, even if part of the energy (e.g. 20%) comes from electricity generation using natural gas as fuel, the $CO_{(2)}$produced does not exceed 16 kg per tonne of $CO_{(2)}$stored, i.e. just 1.7%. There is therefore no doubt about the significant positive impact of the proposed project.
32.40	Lampros	HPM	20/02/2025	Negative	**Taxpayers' money prolongs business models based on fossil** fuels: The oil and gas industry is the main beneficiary of current plans to channel billions of taxpayers' money into CCS.	This part of the comment is the author's opinion and does not relate to the contents of the EIA or include arguments challenging its conclusions. Therefore, it does not need to be addressed in this Memorandum.
32.41	Lampros	Hellenic Petroleum	20/02/2025	Negative	**If large quantities of CO2 are injected into the Prinos wells, the marine environment of the area will be threatened for many centuries:** Thasos is a valuable ecosystem that is already under enormous pressure from tourism and marble quarrying. Increased pressure from storage will lead to a drastic reduction in its attractiveness as a destination.	This part of the comment is the author's opinion and does not relate to the contents of the EIA or include arguments questioning its conclusions. Therefore, it does not need to be addressed in this Memorandum.
32.42	Lampros	HMP	20/02/2025	Negative	**Liability risks are transferred to the state:** To date, there are no long-term studies proving the safety and reliability of CCS technology. Will it be open-heart surgery?	According to existing EU and national legislation, the risk, i.e. the liability for an "accident" (whatever this general term may include), is borne both during the operation of the facility (i.e. for up to 25 years initially, years, but also for any extension, if the capacity of the storage facility allows it) and for a further period of 20 years after the closure of the facility, **the operator.** After 20 years have elapsed since closure and provided that all available data indicate that the stored CO_2 will be kept completely and permanently isolated (Article 18 of the relevant Directive 2009/31 of the European Parliament and Article 19 of the existing national legislation), the storage facility shall be handed over to **the competent authority (Greek State)**. According to the latest data from the Global CCS Institute, there are 50 CO_2storage projects in operation worldwide, with a further 630 in development. Similarly, in Europe, more than 40 projects with a capacity of 140 million tonnes per year are under development with the aim of becoming operational by 2030 (19 projects in EU countries, with a capacity of 42 million tonnes per year by 2030). Therefore, there is no evidence to support the claim that "*To date, there are no long-term studies proving the safety and reliability of CCS technology*."
32.43	Lampros	HMP	20/02/2025	Negative	**Risk to climate protection:**	For the answer to this question, see **Comments 19.10** and **32.10.**

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					At present, the focus on CCS mainly means the following: Postponing the restructuring of industry towards CO_2-free production processes.	
32.44	Lampros	HMP	20/02/2025	Negative	**Safe storage for thousands of years?** Based on current knowledge, it cannot be ruled out that CO_2 will spread underground in such a way that it escapes into the atmosphere through cracks. In any case, it is difficult to imagine that CO_2 will remain safely underground for hundreds or even thousands of years.	Through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 Storage$_2$ in the Prinos reservoir," the movement of the CO_2 plume over time is presented in detail. In addition, the historical evolution of the reservoir pressure is presented in detail. These studies have also calculated the future change in pressure due to the injected quantities of carbon dioxide, as well as the safe limit above which cracks may open. Consequently, the behaviour of the reservoir in response to pressure changes that could lead to the opening of cracks has been thoroughly studied and the safe limit has been taken into account in the design of the project. Furthermore, to better understand the difficulty of imagining that CO_2 will remain safely underground for hundreds or even thousands of years, one need only consider the presence of natural gas, oil rich in hydrogen sulphide and carbon dioxide in the subsoil, not only for hundreds or thousands of years, but for millions of years.
32.45	Lampros	HMP	20/02/2025	Negative	**Truly innovative solutions may be available much sooner:** The rapid availability of CCS seems to be a pipe dream: it will take ten to 15 years at European level to build the necessary infrastructure. The design, construction of capture units, the pipeline network for CO_2 distribution and the selection of final storage sites cannot be completed before 2035. This may soon lead to high storage rates in Prinos. We are losing valuable time for real climate change.	This part of the comment is the author's opinion and does not relate to the contents of the EIA or include arguments questioning its conclusions. Therefore, it does not need to be addressed in this Memorandum.
32.46	Lampros	HEM	20/02/2025	Negative	**What we ask of the state:** Impartial opinions from independent third-party researchers, funded by the state with close involvement from the local community, rather than by the company. Transparency. A veil of silence has been imposed by the company on the local community regarding the project. The company had almost three years to prepare, while the consultation must be completed within a few weeks, without the local community being informed ( ). Consultation is of little use if citizens do not have confidence in the procedures and those responsible for them. Support for the creation of discussion panels by citizens for citizens with the aim of informing the local community Without the genuine participation of citizens, the consultation will be a mere formality, as the decision will already have been taken at the political level.	Regarding the claim that *"a veil of silence prevailed around the project from the company towards the local community,"* it should be noted that in order to provide comprehensive information to the residents of the area (as well as all interested parties), actions have been (and continue to be) implemented on three levels: • By the licensing and supervisory bodies of the central administration. More specifically, the Environmental Impact Assessment (EIA) for the project *"CO_2 in* Prinos" was duly forwarded by the Environmental Licensing Directorate (DIPA) on 23 December 2024 for publication and consultation to **the Regional Council of Eastern Macedonia Thrace** and **other public bodies and services,** for publication in the context of the start **of the consultation and public information process,** while at the same time the EIA has been made available (open access) in the Electronic Environmental Registry (EER) (this public consultation was completed on 25.02.2025).Furthermore, the President of the Regional Council, in a letter dated 14 January 2025, sent a notice to the website of the Region of Eastern Macedonia and Thrace (https://www.pamt h.gov.gr/m-p-e-toy-ergoy-monada-apothikeysis-co2-ston-prino/) and invited the interested public to take note and submit written comments in the context of the launch of the public consultation on the content of the EIA file for the project "$CO_{(2)}$storage unit in Prinos" by 14 February 2025. The above actions and measures show that the applicable procedure and actions required to inform the local community and allow it to express its views have been followed. • By institutional bodies in the local and wider area. For example, information days were organised by the Deputy Regional Authority of Kavala in Kavala and by the Technical Chamber of Eastern Macedonia in Thasos. • By the project promoter. EnEarth has informed its social partners in the region and has also created a special website in Greek (www.enearth.earth/en) with detailed information about the project, where the entire Environmental Impact Study currently under consultation is posted. Recently (April 2025) the project operator provided additional information on the project with the official announcement of the signing of a Memorandum of Understanding with Kavala Solutions, which operates in Nea Karvali, the former Phosphate Fertiliser Industry, for the storage of all carbon dioxide emissionsfrom the Blue Ammonia production unit in the Prinos storage area. • In addition, there are forms for communicating with the company to answer any relevant questions. The other questions raised in this Comment do not concern the content or jurisdictional issues of the EIA. Therefore, they do not need to be answered in this Memorandum.
32.47	Lampros	HMP	20/02/2025	Negative	**In conclusion, the following should be emphasised:** For Thasos, a cost/benefit analysis is absolutely essential.	For the answer to this specific question, please refer to **Comment 32.2.** However, with regard to the statement *'For Thasos, a cost/benefit analysis is absolutely essential'*, it should be noted that no costs are foreseen for Thasos and the wider region in general.
32.48	Lampros	HIM	20/02/2025	Negative	A register of all risks affecting Thasos and the surrounding area must be created and a quantitative assessment of these risks must be carried out, i.e. how likely it is that something will happen in a given period of time. When quantitative assessment of risks is not possible, the risk register must contain a detailed record of each risk with an allocation of responsibilities (RACI matrix), which must be discussed at length by the local community. The classification of risks as low, medium and high importancexxii, as	This part of the comment is the author's opinion and does not relate to the contents of the EIA or include arguments questioning its conclusions. Therefore, it does not need to be answered in the context of this Memorandum.

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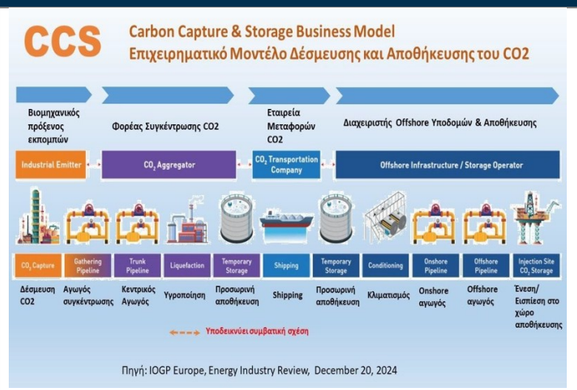
					proposed in the study, leaves much room for interpretation, but it is a start. Open and clear communication with the local community is essential. But is it worth doing all this if the decision is going to be made on political criteria anyway?	
32.46	Lampros	Hellenic Ministry of Environment and Energy	20/02/2025	Negative	Based on recent political developments in the US (Donald Trump's "Drill, Baby, Drill" policy), the entire structure of climate policy established by the EU is being shaken. Every model, every study and every feasibility analysis is good or bad depending on the conditions on which it is based, and it is no secret that these conditions are controlled and set politically. What is different about the issue of carbon storage in the Prinos wells? Even Tesla, for example, is in a position to earn more than a billion euros in additional revenue in 2025 under the European emissions trading system. This was confirmed by analysts at Swiss bank UBS Group AG.xxiii What is the point of this structure, one might ask?	This part of the comment is the author's opinion and does not relate to the contents of the EIA or include arguments questioning its conclusions. Therefore, it does not need to be answered in this Memorandum.
32.47	Lampros	HMP	20/02/2025	Negative	Thasos has no benefit from this project. In 2023, the state received only €64,000 from Energean for Prinos. What will it receive from the storage of pollutants? The jobs they promise and donations to schools, churches and sports clubs? Of the €1.1 billion, how much will return to the Kavala region? If there is a chance that something will go wrong, it will. That's what the odds tell us. So why should the region shoulder such a risk for hundreds to thousands of years when it will not reap the slightest benefit? We have driven all the industries out of our region. Are we now going to import pollutants and destroy our tourist paradises? Why should I come as a tourist to Thassos in the next 1,000 years when I know that two or three kilometres from the coast of Rachoni, Prinos, Sotiras or Kallirachi, a sudden explosion could occur? Is this the development we want? Should we pray every day for the next millennium that nothing bad will happen?	The socio-economic impact of Energean's activities is not limited to the money that, as the comment states, is paid to the state. On the contrary, Energean's activities in Kavala bring a wide range of direct and indirect benefits to the wider region. For example, through the operation of the production process at the Prinos deposits, Energean contributes around **€15 million** annually (salaries for local workers, investments by local companies, maintenance, supplies of machinery and goods, transport, room rentals, Corporate Social Responsibility actions) to the local economies of the Region of Eastern Macedonia & Thrace, with a focus on the prefecture of Kavala. From the same activity, which remains loss-making over time with tax losses of around €400 million, the Greek State, social security funds and public interest companies collect around **€27 million annually**. The implementation of the investment, which will exceed €1 billion, will ensure the continuation of industrial activity in the Gulf of Kavala, which currently employs around 170 people, while the special operating unit for the CO_2project will employ more than 40 workers. During the construction phase of the project, more than 200 workers will be employed. A large part of the investment (which will exceed €1 billion) will be carried out with the participation of local businesses and contractors, bringing additional income that will spread throughout the Region of Eastern Macedonia & Thrace, with a focus on the prefecture of Kavala, which will obviously also boost the tourist product of Thasos as the closest recognisable tourist destination. **After all, tourism in the Gulf of Kavala and Thasos developed while oil production from the Prinos deposits had already begun in the early 1980s.** However, the commentator's argument that *"If there is a chance that something will go wrong, it will go wrong at some point. That's what the odds tell us"* is particularly interesting. The odds clearly do not tell us this, because according to this logic, any facility with a chance of a major accident (e.g. airports, ports, industrial plants, dams, etc.) should already have been abandoned. Similarly, a "sudden explosion" cannot occur at distances of "two or three kilometres from the coast of Rachoniou, Prinos, Sotiras or Kallirachi", as detailed in **Section 10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO THE RISK OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. Based on the documentation in this section and in accordance with the risk studies and simulations carried out in the context of the proposed project, it is estimated that the toxic effects of CO_2 that could potentially cause adverse H&S impacts in the event of a serious accident related to the project or disaster extend to: • ~780 m from the CO_2 receiving point of the onshore pipeline (or approximately 300-350 m from the boundaries of the Sigma industrial facility), in areas that include neighbouring crops, the adjacent fish farm and the pier, but will not reach residential areas or public facilities. • ~1000 m in the area above sea level and within a few metres radius in the sea from the point of the underwater CO^2transport pipeline that may rupture or from the location of the offshore facilities. It follows from the above that both the probabilities and the geographical spread of potential impacts with fatalities are relatively limited and in most cases smaller than those that may occur in the event of accidents in normal industrial structures and facilities. In any case, even in the event of a serious accident related to the project or a disaster, their geographical distribution does not affect areas with residential or holiday activity (including the areas mentioned in the comment), but is limited to the area occupied by the facilities. Finally, it should be noted that tourists currently visit Thasos, which is known to be the location where the proposed project will be implemented, where hydrocarbon extraction activities are carried out, which involve risks of accidents and disasters. Therefore, it is unclear why tourists would be discouraged by the operation of the CCS project, which, it should be noted, has a significantly lower probability of causing a serious accident or disaster than hydrocarbon extraction activities.
32.48	Lampros	HMP	20/02/2025	Negative	Annex I	This material was used to document previous comments by the same author (where the corresponding references are provided), which have been addressed in this Memorandum and do not require further analysis.

No	Sender	Ref. No. Incoming	Date sent	Opinion	Document comments (the following comments are exact excerpts from the corresponding documents)	LDK comments
					 Annex II: 	
32.48	Lampros	HMP	20/02/2025	Negative	**Annex III: 1/2** Signatory organisations, initiatives, communities and companies against CO_2capture and storage (the list is constantly being updated) **Germany:** Aktionsbündnis Energiewende Heilbronn Aktionsbündnis Münsterland gegen Atomanlagen Anti-Atom-Gruppe Freiburg Arbeitskreis Umwelt (AKU) Gronau Working Group on Environmental Protection Bochum e. V. (AkU) Berlin Water Table Bochum Climate Protection Alliance (BoKlima) Buirer für Buir Bund für Umwelt und Naturschutz (BUND) e.V. Federal Association of Citizens' Initiatives for Environmental Protection (BBU) Federal Association for Environmental Consulting (bfub) BUND Youth Citizens' initiative "No Fracking" in the Völkersen natural gas field Citizens' initiative Flecken Langwedel against gas drilling Citizens' initiative against CO_2 -Endlager Citizens' initiative Intschede Wesermarsch without drilling rigs Citizens' initiative Lintler Geest against gas drilling Citizens' initiative "Red Hand" in Thedinghausen/Achim	This material was used to document previous comments by the same author (where the corresponding references are provided), which have been addressed in this Memorandum and do not require further analysis.

No	Sender	Ref. No. Incoming	Date sent	Opinion	**Document comments** (the following comments are exact excerpts from the corresponding documents)	LDK comments
					Citizens' initiative for a clean environment and energy in Altmark Citizens' initiative Walle against gas drilling Dagebüller National Park Guide German Environmental Aid Association Energy Watch Group, President Hans-Josef Fell European Energy Transition Community e.V. Forum Environment and Development Fridays for Future Regensburg Municipality of Dagebüll Gemeinwohl-Ökonomie-Unternehmen Berlin-Brandenburg (GWU) Green Planet Energy eG Greenpeace Hamburg Energy Table e.V. Climate Petition Flensburg 6 Climate Alliance Brandenburg Conceptual Work New Economy KulturPflanzen e.V State Association of Citizens' Initiatives for Environmental Protection (LBU) Lower Saxony e. V. Last Generation Regensburg MannheimZero (Germany) Nature Friends of Germany Naturschutzverein Südtondern e.V. Nutzwerk Hamburg Global e.V. Ecumenical Work of the North Church Powershift Robin Wood Round Table on Renewable Energies (RT-EE) **Annex III: 2/2** Wadden Sea Conservation Station Scientists4Future Schleswig-Holstein/Kiel SEA ME GmbH (Operator: in zerooo Mehrwegsystem) SOFA (Immediate Nuclear Phase-Out) Münster Solarverein Goldene Meile e.V. Umweltinstitut München Urgewald e.V. Association for Nature Conservation and Landscape Management in Central North Frisia e.V. **International Organisations:** AbibiNsroma Foundation (Ghana) AirClim (Sweden) Association pour la Conservation et la Protection des Écosystèmes des Lacs et l'Agriculture Durable (DR Congo) Biofuelwatch (International) Center for International Environmental Law (CIEL) (USA / international) Climate Action for Lifelong Learners (CALL) (Canada) Comité Schone Lucht (Netherlands) Earth Ethics, Inc. (USA) Earth Thrive (UK) Leefmilieu (Netherlands) Limity jsme my! (Czech Republic)	

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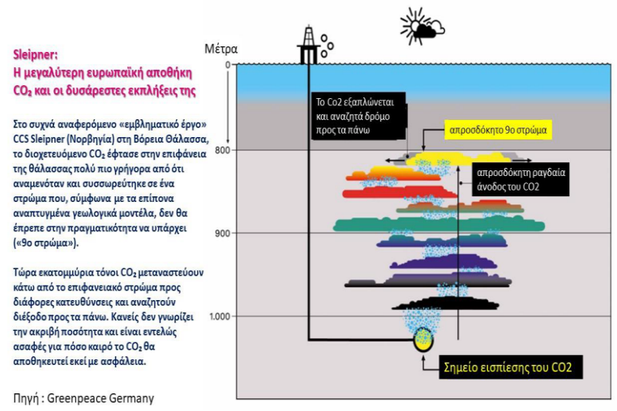
					Miljøforeningen Havnsø-Føllenslev (Denmark) Mobilisation for the Environment (Netherlands) NOAH Friends of the Earth Denmark (Denmark) Norwegian Forum for Development and the Environment (Norway) Oil Change International (International) Spire (Norway) 7 Stowarzyszenie Ekologiczne EKO-UNIA (Poland) Zero Waste Europe (International) **Experts** Andy Gheorghiu Consulting Prof. Dr. Gunther Seckmeyer, Managing Director of the Institute for Meteorology and Climatology at Leibniz University Hannover Prof. Dr. sc. agr. habil. Kerstin Wydra Chair of Plant Production in Climate Change – University of Applied Sciences Erfurt Prof. Jürg Rohrer, Prof. for Ecological Engineering, Head of Research Group for Renewable Energy, ZHAW Zurich University of Applied Sciences **Appendix IV** Figure 1: Sleipner  Contrary to Greenpeace's conclusion in the EnEarth environmental study, we read the following: *"The project concluded that the environmental risks of CO2 storage in the seabed, determined by the impact and probability of leakage, are expected to be small even if a large number of CO_2sites were developed in European offshore areas."*[xxiv] Figure 2: Comparison of Sleipner and Prinos	

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					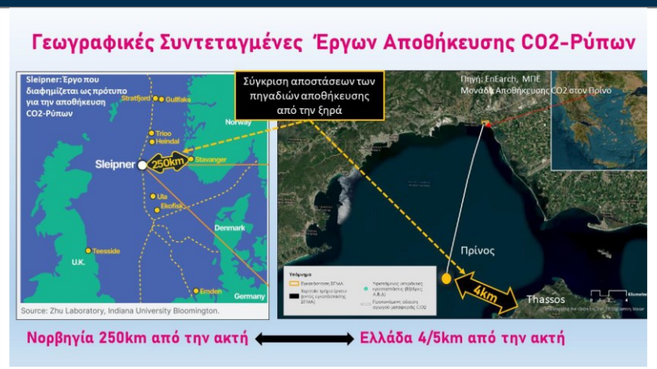 Source: https://ieefa.org/sites/default/files/2023-07/2023-06-13%20Norway%20Sleipner%20%2B%20Snohvit%20CCS%20Webinar_Grant%20Hauber.pdf. _____ **Sources/Notes:** i Energean PLC is based in London, Details: ISIN GB00BG12Y042, Share ownership 37.71% Israel, 25.84% United Kingdom, 17.31% Natural Persons, 6.39% USA and other persons/institutions Source: https://de.marketscreener.com/kurs/aktie/ENERGEAN-PLC-42413942/finanzen/ November 2024 ii CCS stands for Carbon Capture and Storage and refers to the capture and storage of carbon dioxide. With CCS, $CO_2$is collected from industrial facilities and transported to an underground storage facility, where it is stored permanently for centuries. EnEarth intends for Prinos to function as such a permanent $CO_{(2)}$ storage facility. iii EnEarth estimates that for an average year of operation of the 1,000,000 tonne CO2 storage project, an additional 130,825 tonnes of CO2 will be produced for capture, transport and storage. It therefore calculates savings of 1,000,000 – 130,825 = 869,175 tonnes, i.e. negative emissions. The problem, however, is that we have not avoided these 869,000 tonnes; we have buried them for centuries without knowing exactly what impact they may have on the environment. This burden of risk remains on the shoulders of society. Ignoring this risk, the study calculates the economic benefit to society due to the "negative emissions buried at the bottom of the sea". Environmental Impact Assessment (EIA) of the Project: CO2 Storage Unit in Prinos, Page 4/34, 247, LDK Consultants, Date: November 2024 iv Economies of scale are expressed in the fact that the storage cost per tonne of CO_2 decreases as the amount of CO_2 emissions to be stored increases vIOGP is a Brussels-based lobby organisation for the fossil fuel industry. IOGP Europe is registered as an ASBL under Belgian Law. Company number 0759.579.581. EU Transparency Register: 3954187491 70. Registered office: 188A Avenue de Tervueren, B 1150 Brussels, Belgium. vi International Association of Oil & Gas Producers: The Case for a European CCS Bank, A competitive CCfD auctioning mechanism for the EU, January 2025 https://tradingeconomics.com/commodity/carbon viii Tsimafei Kazlou, Aleh Cherp & Jessica Jewell Feasible deployment of carbon capture and storage and the requirements of climate targets. https://www.nature.com/articles/s41558-024-02104-0 ix Environmental Impact Assessment (EIA) of the Project: CO2 Storage Unit in Prinos, Page 10/4, 852 LDK Consultants, Date: November 2024	

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					x Carbon Capture and Storage Discussion paper on integration into national climate protection strategies Position // September 2023 Federal Environment Agency https://www.iene.eu/articlefiles/inline/sardi%20-%2014th%20seeed.pdf Prinos, a CO2 storage option for SE. Europe Dr. Katerina Sardi, Managing Director & Country Manager in Greece xii Environmental Impact Assessment (EIA) of the Project: CO2 Storage Facility in Prinos, Page 218 LDK Consultants, Date: November 2024 xiii https://ieefa.org/resources/norways-sleipner-and-snohvit-ccs-industry-models-or-cautionary-tales xiv Murphy's law states that "Anything that can go wrong will go wrong" xv BGR (2010) Project CO2 Pressure Simulation Regional Pressure Development during the Injection of CO2 into Saline Aquifers. Final Report A-0602015.A. https://www.deutsche-rohstoffagentur.de/DE/Themen/Nutzung_tieferer_Untergrund_CO2Speicherung/Downloads/CO2- drucksimulation-abschlussbericht.html?nn=1544712 https://www.deutsche-rohstoffagentur.de/DE/Themen/Nutzung_tieferer_Untergrund_CO2Speicherung/Downloads/CO2- drucksimulation-abschlussbericht.pdf? blob=publicationFile&v=2 GRS (2009) Long-term safety assessment of CO2 underground storage. CO2-UGS-Risk project, final report. Authors: Jörg Mönig, Klaus-Peter Kröhn. Gesellschaft für Anlagen-und Reaktorsicherheit (GRS) mbH, June 2009. https://www.grs.de/sites/default/files/publications/GRS%2520-%2520250_0.pdf xvi http://www.fze.uni-saarland.de/AKE_Archiv/AKE2024F/Vortraege/AKE2024F_6Wallmann_CCS-unterNordsee_21ppt.pdf CCS and CO2 storage under the German North Sea: opportunities and risks *Klaus Wallmann (GEOMAR, Head of GEOSTOR Project) xvii Environmental Impact Assessment (EIA) of the Project: CO2 Storage Facility in Prinos, Page (4-30, 243) LDK Consultants, Date: November 2024 xviii https://www.greenpeace.de/publikationen/Report_Geologische-Risiken_CCS.pdf GEOLOGICAL RISKS OF CO2 INJECTION IN THE NORTH SEA xix Environmental Impact Assessment (EIA) of the Project: CO2 Storage Facility in Prinos, Page (5-77,332) LDK Consultants, Date: November 2024 xx The existing Beta platform, for example, has connections for 12 wells, and the plan is to drill two CO2 injection wells and two water production wells. Modifications will also be made to other platforms, as mentioned in the study. Environmental Impact Assessment (EIA) of the Project: CO2 Storage Facility in Prinos, Page (10-2, 850) LDK Consultants, Date: November 2024 xxi From a purely legal point of view, it is already possible to capture CO_2 in Germany and transport it abroad for storage purposes. However, this is currently a purely theoretical possibility. There are several reasons for this: $CO_{(2)}$storage facilities cannot currently be licensed. For this reason, there are no $CO_{(2)}$storage facilities. The relevant law on carbon dioxide storage, the KSpG (Kohlendioxid-Speicherungsgesetz), only allows the construction of storage facilities for testing purposes. Consequently, $CO_{(2)}$ would have to be transported abroad for storage. However, the London Protocol prohibits the export of CO2 for offshore storage, i.e. storage under the seabed. xxii Environmental Impact Assessment (EIA) of the Project: CO2 Storage Facility in Prinos, Page 10- 3,851 LDK Consultants, Date: November 2024 xxiii https://www.auto-motor-und-sport.de/verkehr/tesla-milliarde-mehreinnahmen-emissionspool-vw-2025/ xxiv Environmental Impact Assessment (EIA) of the Project: CO_2Storage Facility in Prinos, Page 236 LDK Consultants, Date: November 2024	

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					Lambros Sakellariou Thassos, 27/01/2025	
33	Lampros	HIM	20/02/2025	Negative	II. Position on the Project based on the Kalogeriko Workshop **FILE:** 33. Agenda_Kalogeriko.pdf TEE AM workshop on the CO_2storage facility in Prinos 30/01/2025 in Kalogeriko, Limenas A critical view of the issue of creating the largest final CO_2 pollutant landfill site in South-Eastern Europe Lambros Sakellariou, 23/01/2025 The news of the use of the "wells" of Prinos as a final sanitary landfill site for CO_2pollutants for hundreds to thousands of years has alarmed many residents of Thasos and the wider region, especially those involved in tourism or living within walking distance of the wells. The plan of EnEarth, a subsidiary of Energean (the majority of whose shareholders are Israel 37.71% and Great Britain 25.84%), is to store up to three million tonnes of $CO_{(2)}$ pollutants per year in Prinos. Energean has already secured €150 million in funding and has applied for a further €1.1 billion. The $CO_{(2)}$pollutants will come from power stations, waste incineration plants, refineries, cement and steel production facilities, etc. The industrial waste will not come from Greece alone. $CO_{(2)}$pollutants will be captured from the chimneys of the facilities and will end up in Prinos via pipelines from Bulgaria, ships from Croatia, Italy and southern Greece, and trucks from nearby areas. This will create the largest COemissions in Southeast Europe, which will have a huge negative impact on the future tourism landscape of the island and the surrounding area. The deterioration of Thassos as a tourist destination can no longer be avoided. From a leisure destination, we are becoming an industrial zone for the collection of pollutants, a cheap tourist destination, thereby jeopardising hundreds of investments, large and small, that have been made or are being made across the island. The environmental impact cannot be assessed by any study due to the long-term effects, which are estimated to last from one to 10,000 years. Sudden explosions, known as blowouts, are very difficult to contain at the bottom of the sea and can have devastating effects. The burden and cost of monitoring for generations will be borne by the state. In the event of a leak, we will have acidification of seawater, which will lead to the death of many marine organisms, but also, due to the intense pressure with which $CO_{(2)}$will be injected into underground wells, there is a high probability of it seeping in.	For answers to these specific questions, please refer to **Comments 32.1** to **32.48.**
34	Lampros	HMP	20/02/2025	Negative	II Video describing the negative implications of the project for tourism in Thasos https://www.tourism-network-thassos.com/library/thassos/2024/prinos/2024_12_26_CCS_Prinos_Greenpeace.mp4	This comment refers to audiovisual material (video) presenting arguments against the implementation of the project. As is understandable, it cannot be answered point by point in the context of this Memorandum. However, it should be noted that the arguments have been addressed in other comments in this Memorandum, as the creator of the video is the author of **Comments 32.1** to **32.48.**
35	KONSTANTINOS	HIM	21/02/2025	Positive	Is CO_2storage in Prinos safe? Do we have experience with such a project? There are many projects, particularly in the United States and Canada, where CO_2 is injected to enhance oil recovery (EOR). The oil and gas industry was one of the first industries to adopt CCS (Carbon Capture and Storage) technology, having used it since the 1970s in North America in connection with carbon dioxide injection to increase oil production. This process also results in the storage of part of the injected $CO_{(2)}$.Therefore, the know-how for $CO_{(2)}$injection and storage and simultaneous hydrocarbon production is available. However, in the $CO_{(2)}$injection project in Prinos, there are no plans for simultaneous $CO_{(2)}$injection/storage and hydrocarbon production in the same geological horizon. To be precise, CO(2) injection and storage$_2$injection and storage is initially planned to take place in reservoirs B and C, where oil production will have ceased before the start of injection. Injection will later be extended to reservoir A, provided that oil production has also ceased there earlier. The only period during which hydrocarbon production and $CO_{(2)}$injection/storage may occur simultaneously concerns different fields and refers to the first stage of the project, where CO_2 will be injected and stored in reservoirs B and C, and oil production will take place from reservoir A. The fact that reservoir A continues to produce for some time while CO_2 is injected into B and C does not create any interaction between the two activities, as there is no communication between the different reservoirs. Therefore, CO_2 injection always takes place in areas where oil production has ceased. Would a $CO_{(2)}$leak have an impact on the human environment and human activity? Based on an Impact Modelling study to assess the risks associated with a CO_2 from the Prinos carbon storage facilities, it was found that the maximum risk distance for 1% mortality in the terrestrial environment is estimated to be 782 m, which could result from a large leak	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be addressed in this Memorandum.

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					from the CO_2 pipeline. These results show that land leaks cannot affect settlements, individual residences outside the project area or other public facilities. They concern risks to human resources employed during the operational phase of the Project, which, however, are adequately prepared to take immediate measures in case of emergencies (e.g. gas supply interruption). With regard to offshore facilities, the results show that the risk distances from the specified mortality levels are limited to the immediate vicinity of the Beta platform. The maximum risk distance for 1% mortality is estimated to be 80 m at the deck level of the Beta platform, resulting from a leak due to a rupture in the CO(2)pipeline (scenario FC04). However, only the aforementioned FC04 rupture scenario can affect the adjacent Delta platform at the altitude of its decks. Since CO_2 is heavier than air, a leak at an altitude above the surface moves towards sea level and an underwater leak remains close to the surface and disperses, creating a potential hazard for support vessels. At sea level, the maximum distance in the direction of the wind where the concentration is equivalent to a 1% mortality level is approximately 1 km for the subsea pipeline rupture scenario (FC08). In the early stages of the spill (t = <60 s), a high plume is predicted that may exceed the deck levels of the platform for a short period of time, but the distances in the wind direction at these heights are limited. As the pipeline decompresses, the plume height decreases significantly and disperses over significant distances in the wind direction. The height of the dispersion plume is less than 2 m above sea level for distances in the direction of the wind greater than ~100 m, which means that the risk to ship personnel is reduced in these scenarios. However, with the implementation of preventive measures (e.g. pipeline inspection), this scenario becomes extremely rare. With regard to fishing activities, the fishing industry can generally be relocated to other areas without harmful effects, provided that the fish population manages to move away from the affected area. Tourism is not expected to be affected as the impacts are localised and extend to an area outside the project area. Furthermore, there are no expected impacts on cultural heritage as it is located at a significant distance from the project area (>2km). In general, the impacts on the human environment relate exclusively to project workers. https://www.iea.org/energy-system/carbon-capture-utilisation-and-storage/co2-transport-and-storage https://climate.ec.europa.eu/climate-change/causes-climate-change_el	
36	FILIPPOS	HEM	21/02/2025	Neutral/Unclear	The decision of the Minister of National Economy and Finance dated 23/12 24, with ref. no. 195829, on the inclusion of the CO2 storage project in Prinos with European funding, which was posted on the internet, is incomplete (!). Specifically, on page 6, where the milestones and objectives of the project are described, item no. 52 is missing and item no. 51 Consultation is not possible without the publication of the complete file without omissions, so an extension of the consultation period is obviously required. We request a. The publication of the complete decision, without any omissions, in accordance with the law b. An extension of the consultation period for the legal period from the publication of the complete decision without omissions	For the answer to this specific issue, please refer to **Comment 14.**
37	Sotirios	HIM	22/02/2025	Positive	For Lampros You obviously don't know the basics. It's not distance that determines the creation of a CO_2storage facility, but the right conditions. That is, either an old reservoir with proven impermeability or a salty aquifer. Just as there are storage facilities hundreds of kilometres from the coast, there are also storage facilities on land, next to cities, such as in Denmark and England. Prinos, in addition to all the conditions, has one more guarantee: even in the event of a CO(2)leak from the reservoir (something that has only compatible, completely localised and immediately reversible effects), the simulation shows that from the moment it is detected until the CO_2 rises from a depth of 3,000 metres at the bottom, it will take approximately 1,500 years! The Thasians have made the mistake of creating a huge fuss about something that will have no impact on tourism - they don't have oil here. They are discrediting their own product; if anyone wants to run a smear campaign against the island, they have already given them plenty of material.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
38.1	VASILEIADIS	H.P.M.	24/02/2025	Negative	**FILE:** VASILIADIS_ Comments on the EIA for the CO_2Storage Unit Project in Prinos.pdf Comments on the Environmental Impact Assessment (EIA) of the Project: CO_2Storage Facility in Prinos, dated November 2024 1. Critical issues concerning the project, such as the suitability of the geological storage site, three-dimensional subsurface simulations, processing and application of scenarios with the estimated CO_2 to be stored are addressed through specific studies carried out by Energean's technical team and adopted by the study team. Therefore, the estimates of	As part of the "Application for CO_2 in the Prinos reservoir", a series of technical studies and simulations were prepared and submitted to the competent state body (EDEYEP) documenting, among other things, the suitability of the site and the safety of the CO_2storage process as well as all the data mentioned by the author of the comment (three-dimensional subsurface simulations, processing and application of scenarios with estimated CO(2)). The EIA includes the conclusions of these studies, which are considered useful by the researchers for the implementation of the EIA process, since, on the one hand, there is no requirement for them to be included as such in the project's EIA (nor would it be useful), and on the other hand, due to their highly technical nature, these

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					the EIA study team are based mainly on data and studies compiled by the company itself and are considered subjective and unrealistic. This claim is reinforced by the statements on page 10-84 by the researchers: *"Energean's technical team is developing and implementing scenarios with the estimated CO_2 to be stored, the potential sources of CO_2 , the CO_2 transport network and the relevant synergies"*, i.e. while the EIA is under consultation, the processing of critical project parameters continues. The EIA must be a scientific work characterised by independence and autonomy, characteristics that do not apply in our case. In other words, if during the project there are inaccuracies or significant deviations from the model, is Energean responsible?	studies are duly approved by specialised scientific staff of the competent licensing and supervisory authorities and are not subject to public consultation. Therefore, these studies are in no way "*subjective and* unrealistic" as they have been submitted, reviewed and approved by specialised scientific personnel from the competent licensing and supervisory authorities. However, it is striking that the author of the comment refers to the studies and assesses them as "subjective and unrealistic". It would be useful to clarify how the assessments were made, as the specific studies have not been published and are not subject to consultation, so that they can be evaluated by the public. The commenter's statement that "*Critical issues concerning the project, such as the suitability of the geological storage site, three-dimensional subsurface simulations, processing and application of scenarios with the estimated CO_2 to be stored are addressed* ***through specific studies carried out by Energean's technical team and adopted by the study team****. Therefore, the assessments of the EIA study team are based largely on data and studies compiled by the company itself and* ***are considered subjective and unrealistic***." Furthermore, the statement that "*the EIA must be a scientific work characterised by independence and autonomy, characteristics that do not apply in our case*" is inaccurate. We note that, according to national legislation and EU Directives, the preparation of the EIA is the responsibility and obligation of the project promoter, who may collaborate with a certified consultant when unable to prepare it with its own resources. In this context, ENEARTH collaborated with two environmental consultants (one of which is one of the largest international companies in the field of environmental consulting services worldwide and has extensive experience in all types of environmental protection and management), these consultants were members of the project study team (which operates under the responsibility of ENEARTH, which is also the financier in accordance with the requirements of the law), who, in collaboration with other consultants (on technical issues), while the technical departments of ENEARTH, with the help of additional and separate consultants, finalised the project design and prepared the relevant studies within the framework of the interdisciplinary project team. The above is mentioned in order to clarify the manner in which the studies (in particular the EIAs, which are the subject of this document) are prepared for **all** projects that require environmental licensing based on their environmental classification. This process produces the EIAs for the projects, the certification of the "independence and autonomy" of which is the subject and responsibility of the competent licensing and supervisory authorities, as is the case with this specific EIA. Obviously, if during the project there are any inaccuracies or significant deviations from the model, the responsibility lies with the Company (ENEARTH). In accordance with existing EU and national legislation, the risk, i.e. the liability for "accidents" (whatever this general term may include), is borne both during the operation of the facility (i.e. for up to 25 years initially, years and any extension, if the storage capacity allows it) as well as for an additional period of 20 years after the closure of the facility, **the operator ( ).** After 20 years following closure, and provided that all available data indicate that the stored CO_2 will be kept completely and permanently isolated (Article 18 of the relevant Directive 2009/31 of the European Parliament and Article 19 of the existing national legislation), the storage site shall be handed over to **the competent authority (Greek State)**.
38.2	VASILEIADIS	H.P.M.	24/02/2025	Negative	2 As a consequence of the above paragraph (1), not all the mandatory provisions of European Directive 2009/31/EC, as harmonised with national legislation by Joint Ministerial Decision 48416/2037/E, have been complied with.103/2011 (Government Gazette 2516/B/7.11.2011), which sets out measures and conditions for the storage of carbon dioxide in geological formations. According to Annex 1 of the above directive: 2.1 Data collection No data is provided for: •the mechanics of the reservoir. •geomechanics (permeability, fracture pressure). The fact that the average CO_2pressure in reservoirs B (blue), C (red), Figure 6-27 of the study, after 2035 and only for the 1 MTPA CO2 scenario, increases continuously and reaches the maximum permissible limit, demonstrates the uncertainties that may be inherent in the model. Furthermore, no data are provided for the maximum $CO_{(2)}$pressure for the 3 MTPA CO2 scenario. •activities around the storage complex and possible interactions with these activities (e.g. exploration, production and storage of hydrocarbons). 2.2 Three-dimensional static geological model of the earth The uncertainty associated with each of the parameters used to construct the model was not assessed by developing a range of scenarios for each parameter and calculating the appropriate confidence limits. Furthermore, any uncertainty associated with the model itself was not assessed.	As part of the "Application for CO_2 in the Prinos reservoir," a series of technical studies and simulations were prepared and submitted to the competent state agency (EDEYEP), presenting, among other things, the mechanics of the reservoir, geomechanics, the three-dimensional static geological model of the earth, the characterisation of the dynamic behaviour of storage, the activities around the storage complex and possible interactions with these activities,as well as all the required studies and data in accordance with the requirements of phases 1-2-3 of the ANNEX to Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011). The EIA includes the conclusions of these studies that are considered useful by the researchers for the implementation of the EIA procedure, as, on the one hand, there is no provision for their inclusion as such in the EIA of the project (nor would it be useful), and on the other hand, due to their highly technical nature, these studies are duly approved by specialised scientific staff of the competent licensing and supervisory authorities and are not subject to public consultation. Therefore, the commenter's assertion that "*not all the mandatory provisions of European Directive 2009/31/EC, as harmonised with national legislation by Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011), which sets out measures and conditions for the storage of carbon dioxide in geological* formations," as the relevant studies have been submitted, reviewed and approved by specialised scientific staff from the competent licensing and supervisory authorities. With regard to the section of the Comment referring to boreholes, it should be noted that, as part of **the Monitoring, Measurement and Verification (MMV) Plan**, abandoned boreholes will be subject to monitoring and continuous measurement. In addition, wells considered to be of higher risk have been identified for exclusive real-time monitoring and continuous assessment throughout the project. In addition, there will be a specific intervention plan in case of any unexpected phenomena. The above is in line with industry procedures and best practices to ensure that no unexpected events occur, maintaining the safety and integrity of operations. **The design and implementation of CO_2 at the Prinos storage site is a requirement of the licensing process, which is fully covered by a study conducted by an international firm with experience in the relevant field, under the full**

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					2.3 Characterisation of the dynamic behaviour of storage According to the provisions of phase 3 of the ANNEX, at least the following factors should have been examined: (a) possible injection rates and properties of the CO_2 b) reactive processes (i.e. how reactions of injected CO_2 with in situ minerals are fed back into the model) c) reservoir simulator used (multiple simulations may be required to validate certain findings) d) short-term and long-term simulations (to determine the fate and behaviour of CO_2 over decades and millennia, including the rate of dissolution of CO_2 in water. The above parameters are not adequately addressed in the EIA. The pressure and temperature of the CO2 storage formation as a function of injection rate and cumulative injected volume over time and the pressure gradients at the storage site are not yet examined. The rates of crack sealing, changes in the fluid chemistry of the formation and subsequent reactions, the consideration of reactive models for the assessment of effects, critical parameters affecting potential leakage (e.g. maximum reservoir pressure, maximum injection rate, temperature, sensitivity to various assumptions in static geological models of the earth). The reference on page 10-284 of the EIA: "Of the 76 wells from the Prinos platform complex, 29 have acceptable barriers (low risk), 7 are out of structure, 28 are considered acceptable (moderate risk) and 12 are considered unacceptable (high risk)", reinforces the possibility of $CO_{(2)}$leakage.	**approval of EDEYEP. In particular, it is recommended that the company proceed with the specification of the $CO_{(2)}$leakage monitoring programme,in accordance with its obligations, to ensure that any leakage that may occur can be immediately detected and addressed.**
38.3	VASILEIADIS	HMP	24/02/2025	Negative	3. The project is contrary to the spatial planning of the area 3.1 PROJECT COMPATIBILITY (paragraph 2.3, pages 2-9 of the EIA) In the Region of Eastern Macedonia and Thrace, within the framework defined by Law 4447/2016, with Ministerial Decision YPEN/DCHORS/68605/1092 (Government Gazette 248/AAP/25-10-2018), the Regional Spatial Framework (RSF) of the Region of Eastern Macedonia and Thrace was approved. In Article 19, paragraph 4, p. 2577 of the RSP, a general condition is set out according to which: in the design and implementation of projects and actions of the Plan, the guidelines for addressing and adapting to climate change should be taken into account. The researchers arbitrarily assume, as an interpretation of the general condition, that the planned unit is compatible, even though this is not provided for in the Spatial Plan. According to the logic of the authors of the EIA, it would also be possible to install a nuclear power plant in the Region of Eastern Macedonia and Thrace! Article 8 of the P.C.P., entitled "Spatial units of extractive activity," states: *"Oil extraction mainly concerns the marine area, but also extends to the land zone with related processing and storage activities. Integrated management of the activity is promoted by taking all necessary environmental protection measures. With regard to hydrocarbon exploitation, there is potential for expanding drilling to further develop the activity in the existing hydrocarbon exploitation area in the Gulf of Kavala, provided that all necessary environmental prevention and protection measures are taken, in accordance with the guidelines of Article 14 hereof.*	The fact that a project is not provided for in a Regional Spatial Framework (such as the Regional Spatial Framework for Eastern Macedonia and Thrace) does not mean that its implementation is not permitted, provided that it is not expressly prohibited by the Regional Spatial Framework.and its implementation does not conflict with the provisions of the legal and spatial planning regime governing the implementation of similar projects. Specifically, with regard to the implementation of a nuclear power plant, there are a number of provisions which, upon evaluation, could be deemed incompatible, which is not the case for the $CO_{(2)}$storage facility.which has already been deemed fully compatible. In the Region of Eastern Macedonia and Thrace, within the framework defined by Law 4447/2016, with Ministerial Decision YPEN/DXORS/68605/1092 (Government Gazette 248/AAP/25-10-2018), the Regional Spatial Framework (RSF) of the Region of Eastern Macedonia and Thrace was approved. The RSFP of Eastern Macedonia and Thrace aims to formulate a comprehensive strategic programme of spatial policies for the region, which will constitute the basic framework for spatial, urban planning and development choices for the period of its validity. At the same time, the Regional Spatial Plan is also approved by the region itself in environmental terms, as it revises and replaces the previous Regional Framework for Spatial Planning and Sustainable Development. **The Regional Spatial Plan for Eastern Macedonia and Thrace does not provide for specific regulations for CCS projects, but neither does it include any relevant prohibition relating to their implementation or location in the proposed study area.** Furthermore, the only relevant reference in the RDP to the proposed project is in Article 19, which stipulates that: **the design and implementation of projects and actions under the Plan should take into account the guidelines for addressing and adapting to climate change.** At a minimum, projects should be compatible with national and local greenhouse gas emission reduction plans and national energy planning, as well as with the national climate change adaptation plan (Articles 42 and 45 of Law 4414/2016) and the corresponding regional adaptation plans (Article 43 of Law 4414/2016). Therefore, **the project under study aims to mitigate the effects of climate change through carbon dioxide storage and does not conflict with the objectives set by the PPCHSA for the same purpose.** It should be noted that the author's references to the forecasts of the Regional Development Plan of Eastern Macedonia and Thrace for mining activities are not relevant to the proposed project, which is not a hydrocarbon mining project.

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					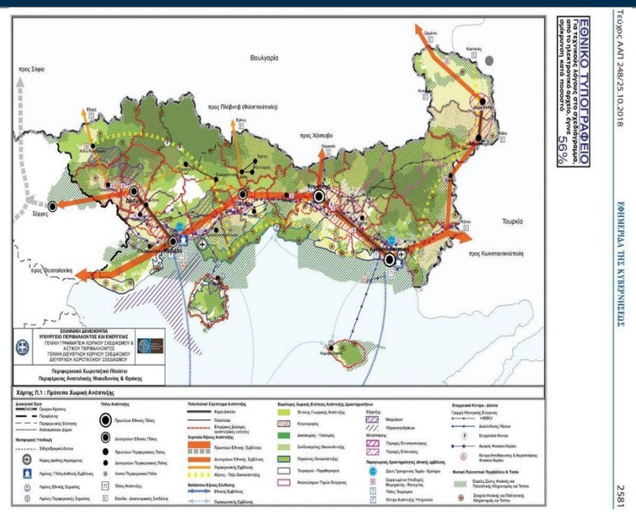 As shown in the above map of the P.H.P., the marine area from the coast of Kavala to Thasos is characterised as 'Wide Zones of Natural and Cultural Heritage and Landscape' (diagonally shaded in green). This area is crossed by a strip of hydrocarbons with two ends to the southwest of Thasos (diagonal purple shading). A natural gas storage centre is also planned, without further details being provided. There is no provision, even as a note on a map, referring to a $CO_{(2)}$storage facility. Furthermore, on page 2559 of the Regional Spatial Plan, the following is stated regarding fishing: "Priority is given to the protection of fishing grounds in relation to other activities carried out in the marine area, such as maritime transport and hydrocarbon extraction."	
38.4	VASILEIADIS	HIM	24/02/2025	Negative	3.2 Land Use Paragraph 2.3.3 (p. 2-11) of the EIA incorrectly states that, according to the General Urban Plan of the Municipality of Kavala (Government Gazette 69/AAP/11-03-2013), the area of the Project's land facilities falls within the "Organised Development Area for Secondary Sector Productive Activities (POAPD)". This specific area (Sigma facilities) is not designated as a POAPD, but according to the General Urban Plan, Zone for the Development of Non-Polluting Secondary Sector Activities, as shown on the map below. Moreover, POAPDs have not yet been institutionalised and until then, the provisions of the ZOE apply.	**Section *'5.7.3 Institutional Status of Land Use in the Study Area'*** states that *'The land facilities of the Project, according to the map in question, are included in the Secondary Sector Activities Development Area (non-polluting),"* as shown in **the** following **Figure** in the same Section of the EIA.

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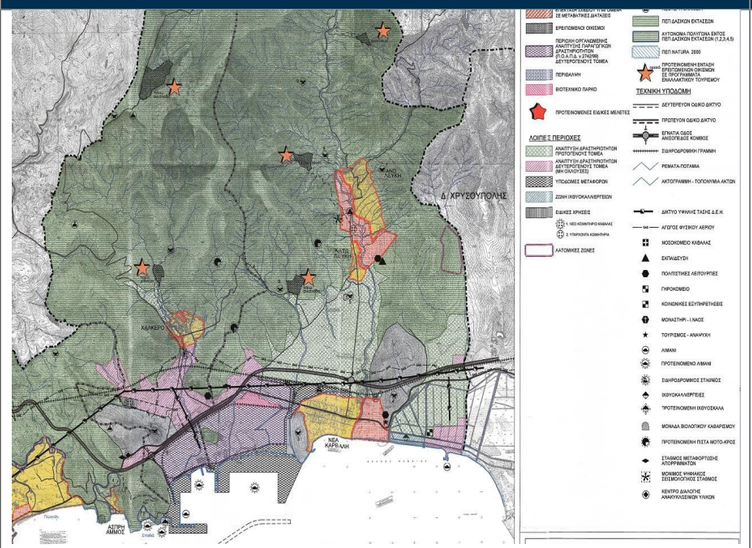
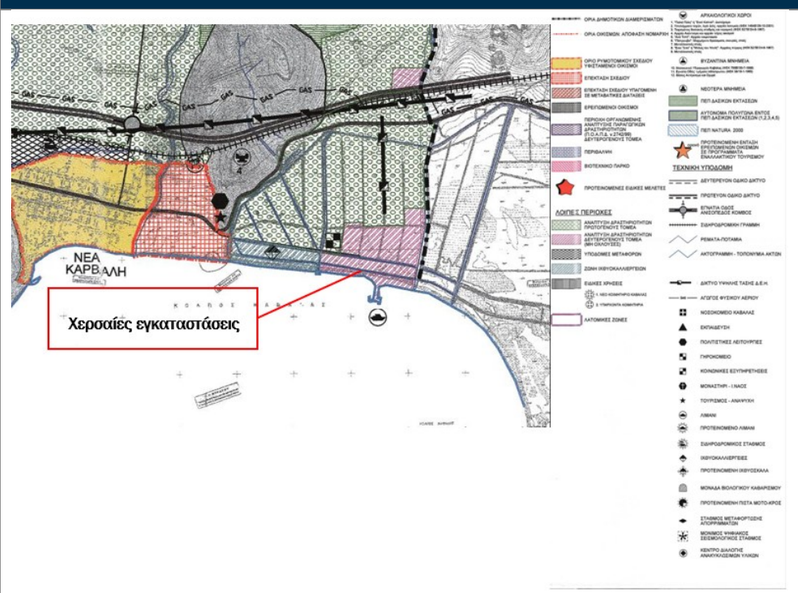
					 According to the General Urban Plan of Kavala, the Zone for the Development of Non-Polluting Secondary Sector Activities (formerly 1d of the ZOEs) includes the areas between Chalkero and Egnatia Odos and areas east of Nea Karvali, as shown on the map. These areas were classified as ZOE 2d (limited industrial or residential development), 1c (zone for future infrastructure development) and 2e (zone for industrial and craft development). For all changes in the uses of the established ZOEs, these changes are either made for uses that are more favourable to the environment or without changing the degree of impact/protection on the environment. Organised Development Area for Productive Activities (POAPD) Secondary Sector is defined as an area for urban planning in accordance with Law 2742/1999 and the requirements of the Special Spatial Plan for Industry (Joint Ministerial Decision 11508/2009 – Government Gazette 151/AAP/13-4-2009), the area west of Nea Karvali, between the Egnatia Motorway and the transport zone of the new port, through its designation as a "General Purpose Receptor". Therefore, the EIA incorrectly states that the Sigma facilities area is a POAPD area. Furthermore, on page 5-117 of the EIA, it is incorrectly stated that: "With regard to the land facilities of the Project, they are located in an area with "Industrial Park" land use according to the land use map of the Municipality of Kavala." As mentioned above, the area of the Project's land facilities is designated as an area for the development of secondary sector activities (non-polluting), contrary to the nature of the project (polluting activity). On page 8-200 of the EIA, it is incorrectly stated that "...The basic proposals of the Kavala Municipal Master Plan include the organisation of the production activities area on the eastern side of Nea Karvali, where the large phosphate fertiliser industry plant and the existing BIOPA are located, in an organised reception area". The fertiliser industry and the BIOPA are located west of Nea Karvali. On page 8-200, it is correctly noted that "the planned Kavala Regulatory Plan has not been completed, while at the same time the corresponding planning, through the GSP/SCHOAP as basic tools for regulating the area at the local authority level, is significantly delayed in the Region of Eastern Macedonia and Thrace." Pending the above plans and the POAPD, the planned project, although not provided for in the plans to date, would create a fait accompli.	 Σχήμα 5–21: Θεσμοθετημένες χρήσεις Γης πλησίον των χερσαίων εγκαταστάσεων του Έργου (Πηγή: Χάρτης Χρήσεων Γης, ΓΠΣ Δήμου Καβάλας (ΦΕΚ 69/ΑΑΠ/11-03-2013) This reference in the EIA, as mentioned in the comment, is erroneous, as can be seen from the relevant map (Figure 5-21 Institutionalised land uses near the Project's land facilities (Source: Land Use Map, GSP of the Municipality of Kavala (Government Gazette 69/AAP/11-03-2013). Given that the land area where the proposed project is located is within the Secondary Sector Activities Development Area (non-polluting), both the existing hydrocarbon extraction facility and the land area of the proposed CCS project comply with the specifications of the General Urban Plan, as: • **Existing Sigma Facility.** The compatibility of the existing Sigma facility is covered by both the transitional provisions of the GSP, which states *"11. Legally existing craft and industrial buildings may operate, be modernised and expanded in accordance with the provisions of Law 3325/2005 (Government Gazette 68 A)"*, as well as by Article 7 of Law 3325, which states: *"4. Activities, including those falling within the scope of Joint Ministerial Decision 172058/11.2.2016 (meaning SEVEZO), which were legally established and operate in areas without specified land uses, may continue to operate if the land use is determined by first-level urban planning with which they become incompatible and are not required to relocate, provided that their removal is not expressly required. The expansion of these activities is possible within the area or site where they operated prior to the designation of land use and within the limits of the degree of nuisance, as determined on the basis of the latest valid operating permit or notification.* • **Onshore part of the proposed CCS project**. The onshore facilities of the proposed CCS project are not part of a new industrial activity in the relevant Zone of the General Urban Plan, as although it is a **category A1** project, it belongs to **Group 11, Transport of energy, fuels and chemicals**, and not to **Group 9, Industrial and related activities.** In addition, CCS activity is not included in Ministerial Decision 3137/191/F. 15/2012 and its amendments (Matching of categories of industrial and craft activities and electricity generation activities with the degrees of nuisance referred to in urban planning decrees), i.e. it is not classified as a degree of nuisance. Therefore, according to the General Urban Plan of the Municipality of Kavala (Government Gazette 69/AAP/11-03-2013), within the Secondary Sector Activities Development Area (non-nuisance), the permitted uses are those included in *"Articles 2, 3, 4 of Presidential Decree 24/1985 (Government Gazette 270/Δ΄/1985), namely: agricultural and livestock buildings, slaughterhouses, agricultural warehouses, tanks, greenhouses, pumping stations, water tanks, wells, industrial facilities."* In conclusion, it follows from the above that the implementation of the facilities of the proposed project is in accordance with the spatial planning regime of the study area and is therefore fully compatible with its spatial planning requirements.
38.5	VASILIADIS	HIM	24/02/2025	Negative	4. Geology: (page 10-7 table of the EIA)	For the answer to this specific question, please refer to **Comment 38.2.** However, it is not clear to the authors of this Memorandum which part of the Comment supports the claim that *"The claim made in the EIA regarding the*

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					On page 10-7 of the EIA table, it is stated: "The assessment of the suitability of the geological formation for CO_2storage is based on data from Energean's technical team, which has carried out a series of special studies and three-dimensional terrain simulations. In addition, Energean's technical team is developing and implementing scenarios with the estimated CO_2 to be stored, potential CO_2 sources,the CO_2 transport network and related synergies. Therefore, based on the above, as well as the more detailed descriptions provided in the relevant Sections of Chapters 4 and 8, this EIA is assessed as being of Low significance. The claim made in the EIA regarding the suitability of the geological formation for CO_2 storage is based on data and studies by Energean. However, Energean has long-standing experience mainly in oil and natural gas extraction, not in CO_2 storage.	*suitability of the geological formation for CO_2storage is based on data and studies by Energean. However, Energean has long-standing experience mainly in oil and natural gas extraction, not in CO_2storage.*" Energean has full knowledge of **the geology** of the study area, which it has acquired through its studies in the context of its many years of activity in the area through hydrocarbon extraction activities. The origin of this knowledge (whether it comes from oil and gas extraction or CO_2storage,is completely irrelevant, as the final information remains the same, namely excellent knowledge of the geology of the study area. The final suitability of the geological formation depends on whether the geological data for the area meet the scientific criteria for CO_2storage and is not related to the experience of any particular company.
38.6	VASILEIADIS	HIM	24/02/2025	Negative	5. Tectonics On page 10-84 of the EIA, it is stated that: "Although the impact on the tectonic characteristics of the area during the operation of the new injection wells is less likely and essentially negligible, provided that the project is operated safely, it is nevertheless real and therefore, in terms of its significance, this impact is assessed as negative, moderate in intensity, local, immediate in terms of the period of occurrence, long-term, reversible in the short term, non-synergistic, non-cumulative, immediate in terms of its effect, discontinuous and immediately reversible. Consequently, in terms of the Final Assessment, this impact is assessed as 'Minor'. The multiple ambiguities in the above wording reinforce the uncertainties of the project.	In the excerpt quoted by the author of the Commentary, there is no ambiguity. This excerpt is the conclusion of the potential impacts of the project on the geological, tectonic and soil characteristics of the area as a result of the operation of the project under consideration (Section 10.2.3.2). It faithfully follows the EIA methodology described in **'Section 10.1.2.2.1 Calculation of the Significance of Impacts'.** The methodology described in detail in this Section, and in particular the explanations in **Table 10 2: Criteria for the Qualitative Assessment of the Environmental and Social Impacts of the Project** allows for a complete and unambiguous understanding of the project's impacts, as assessed and recorded.
38.7	VASILEIADIS	HIM	24/02/2025	Negative	6. Seismicity Paragraph 8.4.4.2, entitled "Seismic Risk", incorrectly states that the land and offshore areas of the project are classified in seismic risk zone I, i.e. the lowest category, according to the Greek Anti-Seismic Regulation EAK 2000, in order to conclude that there is no seismic risk. In its introduction, the EAK states that it "covers so-called normal risk projects, i.e. projects whose potential damage is limited to the project itself, its contents or its immediate vicinity". The EAK does not cover: "High-risk projects, whose potential failure could have serious consequences for humans and the environment in a wider area outside the project area (e.g. dams, nuclear power plants) as well as marine projects" such as the one under consideration, during the lifetime of which (millennium) it is certain that high-intensity seismic events will occur.	The reference to the seismic risk zone in accordance with the Greek Anti-Seismic Regulation EAK 2000 is not made in order to license the construction of the project's infrastructure based on its static adequacy or to implement the technical design of the project (which are not the subject of an EIA), but to present the intensity of the seismic risk in the area and draw the relevant conclusions from an environmental point of view. Based on EAK 2000, the study area is classified in seismic risk zone I, i.e. the lowest category, which shows that, compared to the surrounding areas (Northern Aegean, Chalkidiki, etc.), the study area is characterised by reduced seismicity. This conclusion is also confirmed by the ***"Seismotectonic Study of the Kavala Area - Geometry and Kinematics of Active Structures based on Seismological, Geological and Geodetic Data"*** conducted by the **Geodynamic Institute of the National Observatory of Athens,** which examined the historical and instrumental seismicity of the Prinos basin and surrounding areas (Orfanou basin, Thasos, wider Kavala area). Similarly, this study also shows that the Prinos basin, in relation to the surrounding areas (Northern Aegean, Chalkidiki, etc.), is characterised by **reduced seismicity.** Therefore, as documented above, the reference to seismic hazard zones in accordance with the Greek Anti-Seismic Regulation EAK 2000 in the context of the EIA is not made in order to authorise the construction of the project's infrastructure in terms of its static adequacy, but to demonstrate the relatively low seismicity of the study area, a purpose which it serves extremely well as it presents the seismic risk for the whole of Greece in a uniform, easily understandable and objective manner. Finally, it should be noted that the EIA does not claim that "*there is no seismic* risk", as the comment inaccurately states, but that the area is characterised by reduced seismicity. For this reason, the impacts related to seismicity are examined both in the context of normal/usual construction, operation and decommissioning of the project, as well as in the context of impacts arising from the project's vulnerability to risks of serious accidents or disasters related to the project (see, for example, **Section 10.4.1.4.1** of the EIA).
38.8	VASILEIADIS	HMP	24/02/2025	Negative	The level of protection required for such projects will be determined by specific studies and provisions based on the consequences of failure of such facilities. However, such studies are not mentioned in the EIA. While the study refers to five (5) active faults, according to the seismotectonic investigation of the Kavala-Prinos area by the Geodynamic Institute, National Observatory of Athens, the area is characterised as tectonically stable throughout the text . It is widely known in scientific circles that there is no aseismic area in Greece; the whole country is tectonically active. The study mentions the 3.8 Richter earthquake 28.3 km northwest of Serres!!! and significantly omits seismic events in the area under consideration (red rectangle), such as the 7.3 Richter earthquake in Drama (on 05-05-1829, which levelled Drama) with significant damage in Eleftheroupoli, Kavala and Xanthi, as well as an earthquake > 6.0 Richter between Thasos and Mount Athos (shown as a star on the study map, Figure 8-57, without being mentioned in the study text). On the same map, the Prinos warehouse does not coincide with the centre of the red rectangle, without any explanation, unlike the blue rectangle. If the red rectangle is placed centrally in relation	The seismicity of the area under study has been thoroughly examined in the study entitled ***"Seismotectonic Investigation of the Kavala Area - Geometry and Kinematics of Active Structures based on Seismological, Geological and Geodetic Data"*** conducted by the **Geodynamic Institute of the National Observatory of Athens**. According to the seismotectonic investigation of the Kavala-Prinos area by the Geodynamic Institute, National Observatory of Athens (NOA), there are five (5) active faults. Based on the available data for the most significant seismic events recorded in the wider area, within a radius of approximately 50 km (or more) from the Project under study during the years 2016-2023, the closest earthquake to the activity under study occurred on 08/12/2017 with an epicentre 28.3 m northwest of Serres and a magnitude of 3.8 on the Richter scale. In summary, the above study examined the historical and instrumental seismicity of the Prinos basin and the surrounding areas (Orfanos basin, Thasos, wider Kavala area). According to the study's conclusions, the Prinos basin, in relation to its surrounding areas (Northern Aegean, Chalkidiki, etc.), is characterised by **reduced seismicity.** The Red Polygon does not have the project exactly at its centre, as the **Geodynamic Institute of the National Observatory of Athens** estimated that this area (from 40.4407°N to 41.2634°N in latitude and from 23.9804°E to 25.3702°E in longitude) meets the criteria for defining the wider area of influence of the project in terms of

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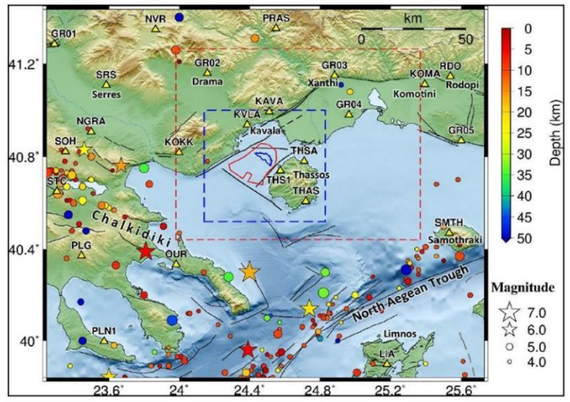
					to the Prinos warehouse, then other significant seismic events will also be included in the area, mainly in the space between Thasos and Mount Athos. Paragraph 10.1.2.1 (page 10-7-table) states that: "Although the Prinos basin is a tectonically stable area (as required for $CO_{(2)}$storage areas in terms of tectonic (seismic) activity), as theoretically CO_2 projects in semi-depleted reservoirs may, under certain conditions, affect the tectonics of the area (the vulnerability of the project to phenomena related to the tectonics of the area is examined in Section 10.13), this EIA is assessed as being of moderate significance." However, section 10.13 referred to in the EIA does not exist in the text.  *(Πηγή: Κατάλογος σεισμικών γεγονότων 1900-2009, Makropoulos et.al 2012)* Σχήμα 8–57: Σεισμικότητα των ετών 1900-2009 στην ευρύτερη περιοχή μελέτης	the Environmental Parameter "Tectonics", due to the tectonic structure of **the Prinos basin.** Furthermore, it should be noted that the EIA presents seismic events from 1900 onwards, when the available data are considered more reliable, and for this reason the earthquake in Drama on 05-05-1829 is not commented on. As regards the numbering of **the section** examining the impact of the project's vulnerability to serious accidents or disasters related to the project (including the vulnerability of the project to phenomena related to the tectonics of the area), the Comment is correct. Indeed, there is no **Section 10.13** in the EIA and its contents are developed in **Section 10.4 IMPACTS RESULTING FROM THE PROJECT'S VULNERABILITY TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT**. The incorrect reference in the text resulted from a change in the capitalisation of the Section that was not carried over to the reference. However, it should be noted that this obvious error only concerns the numbering of the Section's capitalisation and does not concern the contents or substance of the Section.
38.9	VASILEIADIS	HIM	24/02/2025	Negative	The study itself states on page 11-67: "The following measures are recommended for the prevention and mitigation of earthquake effects: Appropriate drilling design to prevent fracturing caused by seismic activity." Furthermore, paragraph 10.4.1.4.1 entitled Induced Seismicity (table) states: "$CO_{(2)}$injection into geological formations can increase pressure within rock formations, potentially causing seismic events." The same table states that this risk will be mitigated by "Continuous monitoring of seismic activity and controlled injection rates." It is clear that there is a risk of seismicity, beyond what has been outlined above, even as induced seismicity.	Through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos reservoir," the historical development of the reservoir pressure is presented in detail. These studies also calculate the future change in pressure due to the injected quantities of carbon dioxide, as well as the safe limit above which cracks may open. Consequently, the behaviour of the reservoir in response to pressure changes that could lead to induced microseismicity has been thoroughly studied and the safe limit has been taken into account in the project design. The EIA includes the conclusions of these studies, which are considered useful by the researchers for the implementation of the EIA process, since, on the one hand, there is no requirement to include them as such in the project's EIA (nor would it be useful to do so) and, on the other hand, due to their highly technical nature, these studies are duly approved by specialised scientific staff of the competent licensing and supervisory authorities and are not subject to public consultation. However, it should be noted that these studies have been submitted, reviewed and approved by specialised scientific personnel from the competent licensing and supervisory authorities.
38.10	VASILEIADIS	HIM	24/02/2025	Negative	7. Reference to air pollution Paragraph 2.6.1 of the EIA (p. 2-23) states that: "According to data from the National Air Pollution Monitoring Network (EDPAR) and the Annual Air Quality Report ( ) (2022), the nearest air pollution monitoring station is located in Kavala and, based on this, it is estimated that air pollutant concentrations in the wider area of the Project are low in relation to the established limits." This claim is untrue because the station in question is out of operation for long periods of time, as reported from time to time by the Regional Unit of Kavala, which is responsible for its operation. The environment in the wider area of Kavala is particularly polluted by sulphur and nitrogen oxides, as well as by suspended particles. There are also the 'white mountains' of radioactive phosphogypsum that have been illegally deposited since the 1960s in an area adjacent to the fertiliser factory, in a former wetland (western end of the Nestos Delta) that has now been converted into an azotic area and, through the water table, communicates with the marine environment around the fertiliser industry. Even the basic recommendation of the EEAE (Hellenic Atomic Energy Commission) to permanently cover the phosphogypsum with plant soil is not being followed.	It should be noted that, according to the website of the Ministry of Environment and Energy and the measurement data of the National Air Pollution Monitoring Network (https://ypen.gov.gr/perivallon/poiotita-tis-atmosfairas/dedomena-metriseon-atmosfairikis-rypansis/), the closest air pollution monitoring station in the project area is located in Kavala. In fact, this is the only station for which reliable data on air pollutant concentrations in the wider project area are available . Consequently, the Kavala station is the most reliable source of data on air quality in the wider project area (and probably the only one) and was therefore correctly selected to provide data for the EIA under consideration. Regarding the claims made by the author of the comment (about sources of air pollution in the project area), it should be noted that no reliable reports or scientific literature have been found to confirm them. However, both the researchers and the project promoter are willing to examine and incorporate them into the project's EIA if relevant sources are indicated by the author of the comment or by the relevant licensing authority.

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38.11	VASILEIADIS	HIM	24/02/2025	Negative	8. Reference to the Seveso II Directive Paragraph 5.2.4.9 of the EIA (page 5-33) states that: "The proposed project is not directly related to this Directive. However, the project is indirectly related to the Directive, as its land-based part is located within the Sigma unit, which complies with all the commitments and specifications arising from the Seveso II Directive." The researchers of the CO2 storage project in Prinos, as unauthorised persons, are not entitled to express an opinion on whether all the commitments relating to the Seveso Directive are being complied with. The above statement reinforces the belief that the EIA is an attempt to present ideal conditions for the project to be implemented. It is well known that there have been several accidents in both industries (fertiliser and Kavala OIL) in recent years, even with human casualties, and that these will become more frequent as time goes by due to the age of the facilities. In the EIA, apart from the reference to the Seveso Directive for Sigma's facilities, there is no mention of the risk that requires the drafting of SATAME plans, which mainly consists of ammonia leaks from the fertiliser factory and hydrogen sulphide leaks from the Energean facilities. And there is absolutely no preparation for what is provided for in the SATAME plans, which were only approved in September 2021 (public information, preparedness exercises, escape plans, etc.) in the event of a major technological accident. Such arbitrary conclusions, as well as those related to air pollution and seismicity, undermine the credibility and scientific validity of the EIA.	The carbon dioxide storage project is not subject to Joint Ministerial Decision 172058/2016, which transposes Directive 2012/18/EU (known as Seveso III) into Greek law, as carbon dioxide is not included in the tables of dangerous substances in the Joint Ministerial Decision. The researchers of the CO_2storage project in Prinos *"do not express an opinion on whether all the commitments relating to the Seveso Directive are being met"* as this is outside their jurisdiction and outside the scope of the EIA, since the carbon dioxide storage project is not subject to Joint Ministerial Decision 172058/2016, which transposes Directive 2012/18/EU (known as Seveso III) into Greek law. Compliance with the obligations of the existing hydrocarbon processing facility with regard to the *Seveso Directive* is monitored and certified by the Ministry of Environment and Energy following the registration of the relevant safety study. Therefore, when the designers of the CO(2)storage project in Prinos state that "...within the Sigma unit, which complies with all the commitments and specifications arising from the Seveso Directive...", they are not expressing a subjective opinion but a documented certification by the Ministry of Environment and Energy following the registration of the relevant **safety study.** It should be noted that there has never been an accident at Energean's hydrocarbon processing facilities that has cost the life of an employee or partner of the company. The above are not arbitrary conclusions but proven facts and data from the facility that are verified by the competent authorities. Therefore, their inclusion in the project's EIA not only does not "undermine the credibility and scientific validity of the EIA", but on the contrary enhances it.
38.12	VASILEIADIS	HIM	24/02/2025	Negative	9. Key Characteristics of the CO_2Storage Site (paragraph 6.3.1.2 of the EIA) Page (6-19) states: "As the studies conducted for the Project matured, it was found that it is more effective to limit CO_2storage to the Prinos structure." Why was an alternative solution not considered, e.g. at the Kappa platform in South Kavala, as required by law? Two alternative scenarios for the initial drilling location are being investigated: a) the platform on which the drill will operate, Alpha or Beta, and b) from which platform hatch the drilling will start, but they concern the same geological formation of Prinos, so in essence it is one scenario.	The law requires that alternative solutions be examined for the development of the proposed and under study project, which is the storage of CO_2 in the Prinos reservoir. This was done by analysing the alternative solutions for the implementation of the CO_2 project in relation to drilling, the offshore approach of CO_2 loads to the storage site, and alternative routes for the CO_2 pipeline to the injection wells. Special documentation highlighted the reasons for rejecting the "zero solution" alternative. All of the above are discussed in detail in **Chapter 7** of the EIA. Storage in the South Kavala reservoir is not part of the proposed project and the EIA under consideration, and if it is considered and selected for CO_2storage in the future, this process will be part of a separate licensing procedure.
38.13	VASILEIADIS	HIM	24/02/2025	Negative	10. Drilling Risk Assessment On page 10-300 of Chapter 10 entitled "Drilling Risk Assessment" (paragraph 10.4.2.3 of the EIA), it is stated that "17 boreholes have been abandoned...however, permeable layers have been identified ... below the bases of these internal barriers. Over time, the protective pipes could corrode and the sandstones could be exposed to CO_2. This means that there is a risk of CO_2 entering these permeable zones. A study is currently underway to confirm whether the evaporite sand layers are suitable as a secondary containment barrier and that they are not characterised as leakage pathways." Therefore, it is not known in advance what the ongoing study will show. The same page states: "Some wells on the Alpha and Beta platforms in Prinos will continue to produce from the layers of reservoir A during the injection of CO2into reservoirs B and C. Being constructed from standard carbon steel grade metals, there is a risk of potential accelerated corrosion of these wells if they come into contact with CO_2 , which would cause integrity problems and possible leakage from the reservoir. However, reservoir modelling can simulate the movement of CO_2 ....". The above wording casts doubt on the final conclusion of the study. Paragraph 10.4.1.1.1 entitled "Possible Leakage Pathways in CO_2 Storage Projects" (p. 10-279) mentions possible leaks: - through old boreholes: Old boreholes are exposed to high pressures and high concentrations of injected CO_2. - through the overlying formation - through faults and fractures - through lateral migration Of the 76 wells in the Prinos platform complex, 29 have acceptable barriers (low risk), 7 are outside the structure, 28 are considered acceptable (moderate risk) and 12 are considered unacceptable (high risk).	The leakage risks that may occur during the project's life cycle have been recognised. Measures to mitigate and minimise risks to acceptable levels have also been identified. These include the construction of new injection wells with corrosion-resistant metallurgy, the planned abandonment of old wells, and the implementation of a comprehensive monitoring, measurement and verification plan to identify and address any anomalies in real time. Through these preventive measures, the project ensures safe and effective CO_2 storage while maintaining the integrity of the reservoir. In addition, In accordance with EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a corrective measures system are an integral part of the CO_2 storage permit2 at the Prinos storage site and their **prior approval** by EDEYEP and the competent EU climate directorate is a prerequisite for the **completion of the licensing process**, which is fully covered by a study conducted by an international firm with experience in the relevant field. In accordance with EU and national law, the monitoring programme is fully implemented both for all years of operation of the storage facility and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take account of changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology. Furthermore, the precise definition of the methodology for treating the pumped water and the parameters for monitoring it do not constitute 'risks' as claimed in the comment, but are simply operational parameters of the project, which do not entail any additional risk. Finally, it should be noted that any risk identified will be included in the Monitoring Plan (which is not a means of addressing risks but rather of detecting them), so that the actions of **the** relevant **contingency plan** can be activated (which, although not covered by this EIA, it will nevertheless be submitted and approved by the competent supervisory authority of the central administration at the appropriate stage of the project's maturity) which is applicable in the event of any unexpected technical issues arising, until they are fully resolved.Finally, with regard to the study to confirm whether the evaporite sand layers are suitable as a secondary containment reservoir, the study has been completed and does indeed confirm the storage capacity of the geological formation, now classifying the possibility of CO(2)leakage to the surface as low. This study was also submitted to the responsible state agency (EDEYEP) as part of the "Application for CO(2)Storage in the Prinos Reservoir."

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					The construction of new CO^2injection wells could potentially cause a risk of leakage. During $CO_{(2)}$injection, there is a significant drop in temperature near the injection well, which could affect the construction of the wells, causing shrinkage and possible micro-cracks. Page 10-287 states: "CO^2storage sites, if not designed to safety standards, can pose risks to human health beyond leakage pathways and secondary protection issues." Obviously, there are no safety specifications in the form of a regulation, because there is no relevant experience. Therefore, based on the above wording, it is recognised that the risks, whether small, moderate or large, are real.	
38.14	VASILEIADIS	HIM	24/02/2025	Negative	11. Storage Site Risk Assessment (par. 10.4.2.4 of the EIA) Page 10-303 states: "Five (5) potential leakage routes have been identified along which CO_2 can escape vertically beyond the boundaries of the storage complex." And on page 10-304 "The Risk Assessment Table (Figure 10-23) shows that leakage route #L1 is the only subsurface leakage route of concern, compared to other potential subsurface leakage routes... This means that the Monitoring Plan in relation to subsurface leakage risks should focus exclusively on monitoring and preparing corrective measures in case $CO_{(2)}$leaks into the Epsilon structure." Therefore, addressing this specific risk of CO_2leakage is deferred to future monitoring.	Through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos reservoir", the possible leakage routes along which CO_2 can escape vertically outside the boundaries of the storage complex are presented in detail. The examination of this specific risk and the results assess the **POSSIBLE** underground leakage route #L1 as **unexpected,** and therefore the corresponding risk is described as **low.** However, in any case, although the corresponding risk is described as **low**, it does theoretically exist and for this reason it will be included in the Monitoring Plan, so that the actions of **the** relevant **contingency plan** can be activated (which, although not covered by this EIA, it will be submitted and approved by the competent supervisory authority of the central administration at the appropriate stage of the project's maturity) which is applicable in the event of any unexpected technical issue, until its complete restoration. In any case, for a more detailed presentation of the risk prevention/minimisation and response measures, please refer to **the** relevant **Section '11.1 MEASURES FOR RISK PREVENTION AND MANAGEMENT'** of the EIA.
38.15	VASILEIADIS	HMP	24/02/2025	Negative	12. Assessment and evaluation of environmental impacts (Chapter 10 of the EIA) For all cases of project impact assessment, both on the human and natural environment and on protected areas (Natura 2000) that are assessed as 'moderate', the EIA consistently refers to preventive measures to minimise them. The following wording of the EIA is characteristic and repetitive: "As these impacts are assessed as moderate in the Final Assessment, preventive/mitigation/countermeasures are proposed in this document so that these impacts are reduced to at least minor." For example, the table on page 1-56. In paragraph 10.3 entitled "Summary of the impacts from the normal/usual operation of the project" in the table on page 10-253 and in the table on page 10-276 with the SPAs (Significant Environmental Parameters) are classified as high ( ), the final impact assessment is classified as moderate. However, following the implementation of the relevant measures proposed, ALL impacts are ultimately assessed as "Minor". The same applies as a rule to almost all parameters of the project. In paragraph 10.4.1.4.3 entitled "Equipment Failure" and on page 10-290 (table), the risk of surface infrastructure failures is qualitatively classified as moderate, mainly due to the marine environment and the age of the infrastructure. Paragraph 10.4.2.2 entitled "Facility Risk Assessment" states (page 10-294): "Partial or total rupture of the pipeline is a significant risk associated with the Project. Considering the high arrival pressures of bulk CO_2(102 barg) and CO_2 loads (60-80 barg), overpressure due to equipment failure or operational errors must be prevented and mitigated to avoid consequences such as $CO_{(2)}$leakage,asphyxiation hazards, etc." On page 10-295, it states: "Pipeline corrosion due to impurities or environmental conditions, mechanical failure (material fatigue or welding defects) and accidental damage from external activities are the other main causes of CO_2 , which pose a major risk with consequences for both human health and the environment (soil and atmospheric pollution). " While the tables on pages 10-296 and 10-297 recognise the above risks as real, page 10-297 proposes (of a general and theoretical nature in the form of reports of ideas) "immediate mitigation actions that will include cleaning and repairing damaged pipes	The procedure described in this comment is a summary of the methodology used to prepare the EIA, as described in detail in **Section 10.1** of the EIA. The assessment and evaluation of the potentially significant effects of the construction of the proposed project was carried out on the basis of the following steps: • **1ο Step**: Identification and evaluation of the **Valued Environmental Parameters (VEPs or Valued Receptors-VRs)** of the natural and man-made environment of the study area. • **2ο Step**: Assessment and evaluation of **the Potential Significant Impacts** from the normal activities of the construction and operation phases of the Project under consideration. The calculation of the significance of each impact is based on **the Conesa method** (Conesa, 2010), which was developed and adapted by the LDK study team so that, on the one hand, it aligns with the international guidelines [3] [4], the relevant national and EU legislation, as well as internationally available best practices, and on the other hand, to respond to the best possible degree of functionality in accordance with the technical parameters of the project under study and the environmental characteristics of the study area. Based on this method, the assessment of the significance of the impact of a project or activity on an environmental parameter is derived from the assessment of the probability of the project/activity having an impact, in conjunction with specific variables, such as, among others the intensity of the intervention, the extent and duration of the resulting impact. The significance of impacts is assessed on the basis of the qualitative effect caused by each impact, which in turn is defined as the ratio by which the environmental impact is measured based on the degree of intensity of the change produced and the characterisation of the impact. This characterisation is based on qualitative criteria such as **intensity (IN), extent (EX), period of occurrence (MO), duration (PE), reversibility (RV), synergy (SI), accumulation (AC), type of effect (EF), periodicity (PR) and recovery (MC)**. The significance of the impact is quantified by assigning corresponding **numerical values** to the above-mentioned evaluation criteria and **a** relative **equation**, which is derived from the weighting of the above criteria, is used. The quantified value of the significance of each impact is an absolute value (Im), which is the **Impact Magnitude** for calculating the quantified value of the significance of the impact. The Impact Magnitude is a quantified value of the significance of each impact and therefore indicates which of the potential impacts of the proposed project are relevant and potentially significant. The assignment of Im values has been standardised into categories, which are separated by specific numerical limits and constitute clearly defined classes for characterising the significance of impacts.

[3] International Finance Corporation (IFC). A Guide to Biodiversity for the Private Sector: The Social and Environmental Impact Assessment Process: https://www.ifc.org/wps/wcm/connect/9608497e-56e8-4074-bab6-45c61a36a4ad/ESIA.pdf?MOD=AJPERES&CVID=jkCYZ3G
[4] European Bank for Reconstruction and Development (EBRD). Guidance Note: EBRD Performance Requirement 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources: https://www.ebrd.com/downloads/about/sustainability/ESP_PR06_Eng.pd

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					and/or equipment to reduce the impact on health and the environment, the review and updating of operating procedures, as well as frequent maintenance and inspection after the incident to prevent recurrence, backup equipment and emergency shutdown systems should be available. Finally, medical assistance should be provided to personnel to mitigate the effects of risks to human health," the risk is mitigated. Similarly, on page 10-301 and in paragraph 10.4.2.3.1.6 entitled "Drilling Risk Assessment" (p. 10-301, 10-302), while serious risks such as "$CO_{(2)}$/ oil / water leakage through drilling in the formation layers - secondary storage containment, reduction of $CO_{(2)}$storage capacity, etc." are recognised,"the implementation of the proposed risk mitigation control measures significantly reduces the risk to ALARP level, without however specifying whether the risk level is generally acceptable (very low risk) or at an acceptable level (if risk reduction is not feasible).	One of the objectives of the EIA is to **prevent** adverse P&C impacts and, therefore, where it has assessed the potential impacts as moderate (and more severe), it proposes ways to mitigate the impacts in order to minimise the residual impacts. **Residual impacts** are those that remain after the implementation of preventive and/or corrective measures. **If countermeasures/mitigation measures are proposed, the significance of these impacts is reassessed on the assumption that the proposed measures will eliminate or reduce their significance.** Therefore, in the context of the project's EIA, not all impacts are assessed as minor (e.g. during the construction phase, the impacts on the climate are assessed as moderate, on birdlife and marine fauna as moderate, etc.) However, the author of this comment confuses the aforementioned impacts expected from the normal/regular activities of the construction and operation phases of the project with the impacts expected from the construction and operation phases of the project. However, the author of this comment confuses the above-mentioned impacts expected from the normal/regular activities of the construction and operation phases of the Project under consideration (**Sections 10.2** and **10.3)** with the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters. For the latter, the provisions of **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT**'.
38.16	VASILEIADIS	EPM	24/02/2025	Negative	13. Assessment of Potential Significant Impacts from Normal/Usual Project Activities Page 2-47 (par. 2.7.2) states: "The scenario of CO_2leakage from the reservoir itself during the operation of the Project (the effects of which are mostly catastrophic) is unlikely. As for a possible leak from the pipeline, this can be avoided by the planned inspection of a smart tool that measures the thickness of the pipeline wall (every 5 years or in other cases of system shutdown)..." The level of risk is highlighted, but the description "unlikely" is not substantiated.	The excerpt quoted in this comment is misleading and does not accurately reflect the contents of the EIA. The excerpt selected refers to **Chapter 2** of the Non-Technical Summary of the EIA, which summarises the main findings and conclusions of the EIA. The documentation for each conclusion of the EIA is provided in the relevant chapters of the EIA and not in the Non-Technical Summary. More specifically, the relevant excerpt is taken from **Section 10.4.5.1,** which states: *"...Furthermore, according to data collected by Energean over a number of years, it has been demonstrated that depleted hydrocarbon fields and related structures have proven storage capacity, a proven impermeable cap to prevent potential leakage of stored fluids, a defined volume of resources suitable for $CO_{(2)}$storage,and are tectonically stable areas. Furthermore, it should be noted that the Prinos basin is a tectonically stable area, as required for $CO_{(2)}$storage areas in terms of tectonic (seismic) activity. Therefore, the scenario of $CO_{(2)}$leakage from the reservoir itself during the operation of the Project (the effects of which are mostly catastrophic) is unlikely. As for a possible leak from the pipeline, this can be prevented by the planned inspection of the pipeline using a smart tool (pigging), which measures the wall thickness of the pipeline (every 5 years or in other cases of system shutdown) and with the planned monitoring system (Annex 16.2). In any case, the consequences depend on the quantity and duration of the leak...'.* The designation **'unlikely'** is based on the analysis in Chapter 10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO THE RISK OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT, which, in addition to the data included in the EIA, relevant project risk analysis studies (e.g. Consequence modelling assessment for Prinos CCS facilities. WSP, July 2024) and the relevant risk analysis carried out within its framework, also presents the findings of the technical studies and simulations that were prepared and submitted to the competent state body (EDEYEP) as part of the "Application for CO_2 in the Prinos reservoir". Finally, with regard to the project's claim that "*the level of* risk *is highlighted*", it should be noted that there is a risk associated with the project, as there is a risk associated with any project and infrastructure. The risk levels of this project have been examined in detail in Chapter 10.4 of the EIA and in the technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) in the context of the "Application for $CO_{(2)}$Storage in the Prinos Reservoir," and in no scenario did the level of risk exceed the classification **of low**.
38.17	VASILEIADIS	H.P.M.	24/02/2025	Negative	14. Monitoring Paragraph 13.6.7 of the EIA (p. 13-28) states: "Quality characteristics of treated water from pumping wells prior to its discharge into the marine environment. The parameters to be monitored will be determined based on the characteristics of the water to be pumped from the reservoir. The pumped water is expected to have a higher salinity than seawater and may be contaminated with oil. In addition to the parameters to be determined, the temperature of the treated water shall be monitored before it is discharged into the sea." The above risks are real, as recognised in the EIA, and cannot be addressed by summarising the findings of the Environmental Monitoring Programme (EMP) during the construction and operation of the proposed project in a relevant Annual Report.	Monitoring programmes and plans are available and are already being implemented effectively in countries that have incorporated this specific know-how into their planning and are constantly evolving within the EU framework. In accordance with EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a system of corrective measures are an integral part of the CO_2 at the Prinos storage site and their **prior approval** by EDEYEP and the competent EU climate directorate is a prerequisite for the **completion of the licensing process**, which is fully covered by a study conducted by an international firm with experience in the relevant field. In accordance with EU and national law, the monitoring programme is fully implemented both during all years of operation of the storage site and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take account of changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology.Furthermore, the precise definition of the methodology for treating the pumped water and the parameters for monitoring it do not constitute 'risks' as claimed in the comment, but are simply operational parameters of the project, which do not entail any additional risk. Finally, it should be noted that any risk identified will be included in the Monitoring Plan (which is not a means of addressing risks but rather of detecting them), so that the actions of **the** relevant **contingency plan** can be activated (which, although not covered by this EIA, it will nevertheless be submitted and approved by the competent supervisory authority of the central administration at

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						the appropriate stage of the project's maturity) which is applicable in the event of any unexpected technical issues arising, until they are fully resolved.
38.18	VASILEIADIS	HMP	24/02/2025	Negative	15. Problems encountered and ways to solve them Paragraph 14.2 (pp. 14-2, 14-3) states: "Due to the innovative nature of this Project for both Greece and Europe ($CO_{(2)}$storage in geological formations) and the lack of relevant expertise on similar Projects, data/ information from various websites regarding the critical environmental issues of similar projects, as well as the experience of the study team from previous Environmental Impact Studies. In any case, an effort was made to ensure that this study satisfactorily covered both the formal requirements of the legislation and the substantive requirements of the project and its impact on the environment. The above statement regarding the satisfactory fulfilment of the project requirements indicates the extent of the uncertainties of a project whose parameters are being explored in uncharted waters.	According to the latest data from the Global CCS Institute, there are 50 CO_2storage projects in operation worldwide, with a further 630 in development. Similarly, in Europe, more than 40 projects with a capacity of 140 million tonnes per year are under development, with the aim of becoming operational by 2030 (19 projects in EU countries, with a capacity of 42 million tonnes per year by 2030). From the above, it is clear that there is abundant international expertise in CCS projects (the authors of this EIA have proven experience in conducting environmental licensing studies for CCS projects at an international level) and that "*the parameters of the project are uncharted territory*". The EIA's note refers to the absence of corresponding know-how on similar projects in Greece (which would be a source of targeted secondary data) but also to the pioneering nature of the project for both Greece and Europe, which may be met with the usual scepticism that accompanies any innovative project and pioneering technology. This excerpt in no way implies the existence of uncertainties, as stated in the specific excerpt from the EIA "data/information from various websites was also used with regard to the critical environmental issues of similar projects, **as well as the experience of the study team from previous Environmental Impact Assessment approaches**," since, as mentioned above, the researchers of this EIA have proven experience in conducting environmental licensing studies for CCS projects at an international level, which they have transferred to the project under consideration.
38.19	VASILEIADIS	H.P.M.	24/02/2025	Negative	16. Feasibility and necessity of the Project: On page 5-67 of the EIA, it is stated: "The captured CO_2 can be used for the synthesis of synthetic fuels until 2040 in accordance with EU policy (in order to reduce the use of new fossil fuels in transport). It can also be stored in impermeable geological formations, as envisaged in the context of this project. In this context, and given that the industry is subject to international competition, investment incentives are provided for the capture of $CO_{(2)}$ emitted by these industrial facilities (in Greece, refineries and cement factories). Similarly, on page 2-8 it states: "Acting as a central storage site for Greece and the Eastern Mediterranean, the Project will receive and store $CO_{(2)}$ from producers who cannot easily reduce their emissions through other initiatives." Therefore, CO_2storage in Prinos is being carried out in order to facilitate polluting industries, contrary to the interests of Thasos and Kavala.	With regard to whether the project prolongs the use of fossil fuels, it should be noted that this will serve industries that are unable to reduce $CO_2$by switching fuels (hard-to-abate industries), as these emissions are part of their production process. Such industries include cement, refineries, chemical industries, steelworks, fertiliser industries, etc. Firstly, it should be noted that the industrial sector in our country employs around 400,000 people and contributes around €18 billion annually to the country's GDP. Consequently, it is easy to understand the socio-economic consequences for the country, workers and consumers if the industrial sector were to be burdened with excessive costs based on European policies and regulations for achieving climate neutrality. It is indicative that domestic industry emits around 15 million tonnes of CO_2per year and if it were currently obliged to pay for all these emissions (as is planned to happen from 2035 onwards), it would incur costs of around **€1 billion per year, as the right to emit $_{CO_2}$ is approximately €70 per tonne**. In other words, either the industries would close down permanently or they would move to neighbouring countries where European climate policies or other similar national policies do not apply (such as Turkey, Egypt, etc.). On the contrary, the CCS project gives Greek industries with GHG emissions the opportunity to make the necessary adjustments in a less "violent" way and become climate neutral and economically viable at the same time. Moreover, the specific role of CCS projects is also recognised by the revised ESEK, which notes that *'...the development of CCS technologies and their possible extension to other sectors beyond those mentioned above increase the need for more storage space. Indeed, while dozens of new carbon storage facilities are currently being developed in Northern Europe, in the Mediterranean* ***there are few new projects and they are insufficient to cover even a small part of the carbon emissions of industries that cannot mitigate their emissions. For this reason, Greece is focusing on identifying new geological formations that are considered suitable for permanent $CO_{(2)}$storage****,with the competent Greek authorities, on the one hand, the Hellenic Hydrocarbon and Energy Resources Management Company (EDEYP) and the Greek Geological and Mining Research Authority (EAGME) to carry out the relevant research. Given that suitable geological formations are also found in other countries in the region, Greece will propose the reform of the relevant framework at European level so as to allow the development of storage facilities in non-EU Member States, while ensuring, of course, the necessary safety, environmental protection, monitoring and certification...".* In conclusion, the claim that *"CO_2storage in Prinos is being carried out in order to facilitate polluting industries, contrary to the interests of Thasos and Kavala"* is not accurate. On the contrary, the CCS project gives Greek industries with GHG emissions the opportunity to make the necessary adjustments in a less "violent" way and become climate neutral and economically viable at the same time. In this way, the climate transition can be achieved in a socially milder way that will not lead to adverse social impacts if it achieves the necessary goal of climate neutrality.
38.20	VASILEIADIS	HMP	24/02/2025	Negative	17. The zero solution Paragraph 7.1, entitled "Zero solution", and page 7-5 state, among other things: "The CO2 storage project in Prinos is expected to contribute positively to the reform of the country's development orientation". The investment is not considered productive, in the sense that no useful product is produced, but rather landfill pollutants are stored. On the contrary, in order to store 1,000,000 tonnes of CO2 per year, it produces an additional 130,825 tonnes of CO2 during operation, i.e. 13% of the stored $_{CO2}$(page 4-34-table of the EIA).	The concept of productivity of an investment used in the comment is misleading and does not reflect the real dimension of the issue as documented by the EIA. The comment claims that "*The investment is not considered productive, in the sense that no useful product is produced...".* According to this logic, the provision of services should not be considered productive, nor should research activities, etc. Obviously, this is not the case. The project contributes **directly and positively** to reshaping the country's development orientation, as it is an investment that is "clean and efficient in terms of resource use". It should be noted that the European Parliament has included investments in carbon capture and storage in the EU's list of "**green" investments, known as the EU Taxonomy, while on the other hand it has included the relevant technologies in the Strategic Technologies for**

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						Europe Platform (STEP). According to Article 2(1) of the STEP Regulation, clean and resource-efficient technologies include zero net emission technologies as defined in Article 4 of the NZIA. The **NZIA** Regulation is Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13June 2024, establishing a framework for measures to strengthen Europe's net-zero emission technology ecosystem and amending Regulation (EU) 2018/1724'. Article 4 of the NZIA, which presents the "List of net-zero emission technologies", also includes "Carbon capture and storage technologies". Finally, it should be noted that the project under consideration also contributes **indirectly** to the reform of the country's development orientation, as the operation of the CCS project gives Greek industries with GHG emissions the opportunity to make the necessary adjustments in a less "violent" way and become climate neutral and economically viable at the same time. In this way, the climate transition is achieved in a socially milder way that will not lead to adverse social impacts if it achieves the necessary goal of climate neutrality.
38.21	VASILEIADIS	HMP	24/02/2025	Negative	The zero solution is advantageous based on the following comments: The "losses" that the local community will suffer are detailed in Chapter 7 (pages 7-4 to 7-6) of the Environmental Impact Study entitled "ZERO SOLUTION". With the clarification that the interests of the local community are not necessarily identical to "national" interests, I would like to make the following comments: • "Large quantities of CO_2produced by industrial facilities will continue to be released into the atmosphere, which could hinder progress towards carbon dioxide emission reduction targets, thereby exacerbating the long-term effects of climate change." In other words, the continuation of pollutant production by industries is supported.	For a detailed response to this issue, please refer to **Comment 38.17.**
38.22	VASILEIADIS	HIM	24/02/2025	Negative	• "CO_2storage is increasingly recognised as a key means of reducing carbon emissions from sectors of the economy referred to as 'energy-intensive', such as electricity generation. The absence of $CO_{(2)}$storage facilities would hinder efforts to reduce greenhouse gas emissions, but it would also hinder the development of the $CO_{(2)}$storage infrastructure sector." In other words, if industries do not continue to produce pollutants, the storage project being promoted in Prinos will not exist.	The interpretation of the EIA excerpt is not accurate because: • It is not realistic to immediately stop all activities that produce greenhouse gas emissions without a period of production and equipment adjustments. • There are activities that are currently essential to human societies and for which there is no other way to reduce GHG emissions to zero, based on the methods and technologies available to date. • There is a need to capture and store quantities of carbon already released into the atmosphere. Therefore, the comment "In other words, if industries do not continue to produce pollutants, there will be no need for the storage project being promoted in Prinos" is not accurate and should be redefined in a more multi-level context.
38.23	VASILEIADIS	HMP	24/02/2025	Negative	• "The lack of CO2 storage infrastructure has a negative impact on the country's ability to meet its European and international obligations, which are included in the National Strategy for Adaptation to Climate Change." In other words, Thasos and the wider region of Kavala have been chosen to fulfil the country's obligations?	Yes, the Prinos area is suitable (based on the scientific criteria set by the legislation on the siting of CCS projects) for the implementation of the proposed project, which will contribute, among other things, to *"achieving the country's European and international obligations, which have been included in the National Strategy for Adaptation to Climate Change", as its implementation complies with all the conditions and requirements of national and EU legislation, while at the same time it does not cause any significant environmental and social impacts, as demonstrated by the EIA under consideration.* The comment is an extreme application of the **NIMBY (not in my back yard)** logic, i.e. the selective rejection of projects of national importance when they are located in specific areas, even when the choice is based on scientific and technical criteria. The location of such projects is based, among other things, on geological and technical data, which are inherently limited geographically – therefore, the choice of locations is objectively limited. Furthermore, with respect to individual local concerns, it is important to note that the fulfilment of Greece's European and international commitments to climate neutrality requires the contribution of all regions, to the extent of their capabilities and specificities. It is worth remembering that regions such as Ptolemaida and wider Western Macedonia have for decades shouldered the burden of electricity generation for northern Greece (and indeed from fossil fuels). To consider that areas such as these should continue to 'host' energy infrastructure, while others are excluded in advance from the implementation of projects and related infrastructure that contribute to the country's socially acceptable energy and climate strategy, is not consistent with the principles of just transition and collective responsibility. The NIMBY logic has proven to be unproductive and, fortunately, is not found in the majority of comments made in the context of this public consultation process.
38.24	VASILEIADIS	HIM	24/02/2025	Negative	• "The absence of CO_2 has a negative impact on the achievement of the overall greenhouse gas emission reduction targets and climate neutrality by 2050, as well as on the offsetting of any emissions that may occur after 2050, in accordance with the revised NAP and the Ministry of Environment and Energy's Long-Term Strategy for 2050."	For the issue of the importance of CCS projects in national climate planning and in the corresponding EU policies, see **Comment 19.10**. However, it should be noted that the Prinos project will not address the climate crisis problem at global and European level as a whole, but only to the extent that it contributes to the removal of approximately 869,000 tonnes of CO_2per year.

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					In other words, Prinos is key to achieving the goals of tackling the climate crisis at global and European level.	
38.25	VASILEIADIS	H.P.M.	24/02/2025	Negative	•"The formations in the Prinos area have significant CO2 storage potential, so failure to exploit these resources would mean a loss of opportunities for economic development (staff recruitment, investment in new know-how). From an economic point of view, it would mean the (direct/indirect) loss of revenue linked to employment in the local market and cooperation with industries related to CO2 storage." In other words, the 45 new jobs promised by the company would be a huge loss for the local community. No mention is made of the impact on the ever-growing tourism industry in Thasos.	For the socio-economic footprint of Energean's activities, see **Comment 32.2**.
38.26	VASILEIADIS	HIM	24/02/2025	Negative	•"The CO2 storage project in Prinos is expected to contribute positively to the reform of the country's development orientation, adding an important alternative pole of environmental development. The implementation of environmentally friendly programmes (including the proposed Project) is an interesting and realistic option that will contribute positively to the country's "green" development restructuring." In other words, the reform of the country's development orientation depends largely on the Prinos storage facility, which cannot be a central choice for the state.	The Prinos project will not address the issue of "*reshaping the country's development orientation*" as a whole, but only to the extent that it is proportionate. In response to the doubt expressed in the comment that "This cannot be a central choice for the state," we would like to point out that the implementation of Carbon Capture and Storage (CCS) projects is a technical/regulatory/economic measure with code **"M38 - Decarbonisation of industry through the promotion of carbon capture and storage (CCS) technologies,** with the aim of "Reducing emissions in the industrial sector" of the revised NECP. In other words, the implementation of CCS projects is a "key policy choice".
38.27	VASILEIADIS	HMP	24/02/2025	Negative	•"Furthermore, avoiding further investment in the Prinos area may have broader implications for global energy markets and the transition to sustainable energy. As the world progressively shifts towards renewable energy sources and low-carbon technologies, decisions taken in the context of projects such as the CO_2 send signals to investors, policymakers and other stakeholders about the viability and direction of future energy investments. In other words, failure to implement the project will cause disruption to global energy markets.	Obviously, the Prinos project (or its non-implementation) will not "disrupt global energy markets". However, the terms and broader context of the implementation (or non-implementation) of such an investment play an important role in informing stakeholders about the feasibility and progress of upcoming energy investments and have a measurable impact on energy markets.
38.28	VASILEIADIS	H.P.M.	24/02/2025	Negative	The choice of the zero solution is also reinforced by the provisions of Article 17, paragraphs 2 and 4, of European Directive 2009/31/EC of 23April 2009 on the storage of carbon dioxide in geological formations: "After the closure of a storage site ... the operator shall remain responsible for monitoring, reporting and taking corrective measures ... until the responsibility for the storage site is transferred to the competent authority. ... The competent authority shall be responsible for monitoring and taking corrective measures in accordance with the requirements of this Directive." Kavala, 20-02-2025 Lazaros Vassiliadis Dr. Civil Engineer Associate Associate Professor, Democritus University of Thrace Email: vasiliadis114@gmail.com	It is not clear to the authors of this memorandum why *"The choice of the zero solution is also reinforced by the provisions of Article 17, paragraphs 2 and 4 of European Directive 2009/31/EC of 23April 2009"* and therefore this part of the comment will not be addressed in this Memorandum.
39	ANDREAS	HIM	24/02/2025	Positive /Unclear	There is a lot of irresponsible talk about seismicity. The study conducted by the Geodynamic Institute of the Athens Observatory shows that the main tectonic activity in the area related to any fault activation is outside the project area and even outside the wider area, as shown in the attached map. Although there are seismic records in the surrounding area, seismicity within the area of interest is insignificant. The onshore and offshore area of the project is classified in seismic hazard zone I, i.e. the lowest category (see map below), according to the "Amendment of the Provisions of the Greek Anti-Seismic Regulation EAK 2000 due to the Revision of the Seismic Hazard Map, Government Gazette 1154/B/12.08.2003". Based on the available data, the closest earthquake to the activity under study occurred on 08/12/2017 with an epicentre 28.3 m northwest of Serres and a magnitude of 3.8 on the Richter scale. With regard to microseismicity, monitoring systems such as seafloor stations for active and passive seismic surveys, microseismicity data from local and regional networks, etc. will be used to detect and measure any induced microseismicity during the $CO_{(2)}$injection period. This monitoring helps to ensure the stability of the underground reservoir and the safety of the environment. Mitigation measures, such as adjusting injection strategies or implementing pressure management techniques, can be used to minimise any risks associated with induced microseismicity and ensure the long-term effectiveness and safety of the $CO_{(2)}$storage project.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.

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40	Stella	HPM	24/02/2025	Negative	I will not go into specific issues regarding the suitability of the Prinos tanks for CO_2storage or the risks that such a project poses to the area. These issues have been thoroughly analysed by other participants in the consultation, and I refer more specifically to the recent post by Dr. Vassiliadis, which highlights all the uncertainties and shortcomings of the EIA. I will focus on the company's communication policy, which misleadingly attempts to present the project as 'green' and 'developmental', essentially underestimating the intelligence of the region's residents. It is reminiscent of colonial practices of impressing the 'natives' with fake coloured beads. Because that is what it is all about, the supposed benefits to the area from the creation of this project. The only beneficiary here will be the company itself, which will continue to reap huge profits now that the oil reserves in Prinos are running out. They are trying to persuade industries to invest huge amounts in the highly uncertain and controversial method of capturing and storing pollutants instead of turning to healthy alternative forms of energy production. In other words, they are perpetuating the problem rather than solving it, motivated solely by self-interest.	This comment is the author's position **against the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum. However, it should be noted that the project is presented as ***'green'*** and ***'developmental'*** because it is. More specifically, CCS projects are included in the proposed measures to achieve climate neutrality, both in the context of national strategies and in the context of European policies. It should be noted that the implementation of Carbon Capture and Storage (CCS) projects is a technical/regulatory/economic measure with code **'M38 - Decarbonisation of industry through the promotion of carbon capture and storage (CCS) technologies,** with the aim of "Reducing emissions in the industrial sector" of the revised NECP. It should also be noted that the European Parliament has included investments in carbon capture and storage in the EU list of **"green" investments, known as the EU Taxonomy, while on the other hand it has included the relevant technologies in the Strategic Technologies for Europe Platform (STEP).** According to Article 2(1) of the STEP Regulation, clean and resource-efficient technologies include zero net emission technologies as defined in Article 4 of the NZIA. The **NZIA** Regulation is Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13June 2024, establishing a framework for measures to strengthen Europe's net-zero emission technology ecosystem and amending Regulation (EU) 2018/1724'. Article 4 of the NZIA, which presents the "List of net-zero emission technologies", also includes "Carbon capture and storage technologies". Under no circumstances do the company and the EIA consider the citizens concerned to be *'indigenous'* when they present the project to them as 'green' and 'developmental'. The above documents show that the project is characterised as 'green' and 'developmental' not arbitrarily, but on the basis of specific provisions of national and European policy on climate neutrality. In no way does the presentation of the project in these terms underestimate citizens or aim to influence them with simplistic or misleading arguments. On the contrary, it is based on official EU strategic and regulatory documents, in which carbon capture and storage technology is recognised as a critical tool for achieving environmental goals and enhancing sustainable industrial development.
41	EVANGELIA	HIM	24/02/2025	Negative	This project is the epitome of public money being wasted for the sole purpose of boosting Energean's share price on the London and Tel Aviv stock exchanges. This company has been operating for years using the following method: collecting licences/concessions, collecting subsidies and "*...seeing if and how things can be done in the end*". There are many examples: for years, it produced much less oil than it could have in order to save the money it was supposed to give to the Greek state under its contract. It is currently expected to raise over €250 million for $_{CO2}$ storage,while the same money could be used to solve many long-standing problems, such as transport safety (so that we never have another Tembi disaster), the productive reconstruction of the Greek periphery with the simultaneous creation of thousands of jobs in agriculture, agrotourism, and manufacturing, and the planting and restoration of hundreds of thousands of acres of green space that have been burned in recent years, e.g. Soufli, which is the best way to reduce $CO_{(2)}$.-The company has a poor track record on safety issues. On 9/4/2022, an explosion and fire broke out in an onshore oil tank at the Prinos facility. If it cannot comply with even basic safety measures in simple facilities, can it be trusted with much more complex projects? -The company's track record does not inspire confidence, as its sudden rise in 2013 was due to a €60 million investment by the notorious international vulture fund "Third Point", registered in the tax haven of the Cayman Islands, which profited from our country's debt crisis.	This comment is the author's position **against the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum. However, it should be noted that the performance of Energean's share on the Tel Aviv Stock Exchange, as well as the entry of the Third Point investment fund into Energean's share capital in 2013, obviously have no connection with the Environmental Impact Study for the 1^{h} phase of the CO_2storage project in Prinos. Although not covered by the EIA, it should be noted that the claim that Energean *'produced far less oil than it could have for years in order to avoid paying the money it was required to pay to the Greek state under its contract'*, and therefore deliberately deprived itself of revenue in order not to pay royalties, which, under the Prinos contract, amount to up to 10% of its revenue. This is not clear to the author of this memorandum, as it seems to suggest that the Company chose to lose revenue with the sole 'profit' being the non-payment of 10% to the Greek state. With regard to safety and environmental issues, in the 17 years that Energean has been managing the Prinos deposits, there has been no incident involving processes with serious consequences for people or the environment. The fire at the facilities on 9 April was extinguished within a few hours thanks to the immediate intervention of the company's firefighting team and the fire brigade, without causing any injuries or environmental damage, clear evidence of the excellent functioning of Energean's **Emergency Response Plan**.
42	Alex	HMP	24/02/2025	Negative	I agree with the views analysed in D11, which I attach, and consider this project unacceptable from an economic and environmental point of view. **FILE:** VASILEIADIS_Comments on the EIA for the CO_2Storage Unit Project in Prinos.pdf	For answers to specific questions, please refer to **Comments 38.1** to **38.28.**
43	MUNICIPALITY OF THASOS	HIM	25/02/2025	Negative	Ref. no. 7/12-02-2025 (ΑΔΑ: 9ΛΕ1ΩΡΔ-85Κ) Decision of the Municipal Council of Thasos "On the issuance of a resolution for the CO_2storage project in Prinos, Thasos". "The Municipality of Thasos, as the highest state institution of the region, with a sense of responsibility towards the present and future of our region, clearly cannot agree and opposes the implementation of the CO_2project in the submarine area of Prinos, Thasos. The risks that may arise from such a project, regardless of the intentions of those who decided on it and those who will carry it out, cause us, the residents of this area, intense and justified concerns and fears, which prevent us from accepting this project. We fully understand any theories about the need to store $CO_{(2)}$ $_{but}$we simply believe that such projects cannot be carried out near tourist destinations with a rich natural environment. The Municipal Council, as the highest political body of our Municipality, is called upon to express its opinion with seriousness and responsibility, as its role dictates, taking into account the will of the citizens beyond any scientific data. The proposal of the Municipal Administration, as publicly expressed by the Mayor of Thasos, is the public expression of	This comment is a decision by the Municipal Council of Thasos **against the implementation of the project**, without, however, including arguments relating to the contents of the EIA, while many of the issues it raises go beyond the scope and jurisdiction of the EIA. Therefore, it cannot be answered within the scope of this Memorandum. However, with regard to the part of the comment that states *"The risks that may be inherent in such a project, regardless of the intentions of those who decided on it and those who will carry it out, cause us, the residents of this area, intense and justified concerns and fears, which prevent us from accepting this project*," it should be noted that for a detailed presentation of the risks associated with the Project's facilities and the possible consequences arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. In addition, with regard to the part of the comment that states "*We fully understand any theories about the need to store CO_2we simply believe that such projects cannot be carried out near tourist destinations with a rich natural*

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					our opposition to the implementation of this project, with parallel actions aimed at obtaining opinions from lawyers and scientists of other specialties in order to fully understand the overall dimensions of this project. **FILE:** DECISION OF THE MUNICIPAL COUNCIL 7_2025 On the adoption of a resolution on the CO2 storage project in Prinos, Thasos (9ΛΕ1ΩΡΔ-85Κ).pdf Excerpt from the minutes of the3rdregular "live" meeting of the Municipal Council. Subject: On the issuance of a resolution on the CO_2storage project in Prinos, Thasos. In Thasos today, on the 12th of February 2025, Wednesday, at 5:00 p.m., the Municipal Council convened in a regular "in person" meeting at the Municipal Office, following the invitation of the President of the Municipal Council, ref. no. 2954/7-02-2025, which was communicated to the Mayor and each of the Municipal Councillors by email on 7-02-2025, and in accordance with the provisions of Law 3852/10 The meeting was attended by the Mayor of Thasos, Mr. Eleftherios Kyriakidis, and the President of the Community of Thasos, Ms. Karkametsou Paraskevi. The following Municipal Councillors also attended and were present. Of the 25 members, there were: Present: 22 Present — Absent 1. Pipinis Dimitrios — 1. Karavouzis Stylianos 2. Kalafatis Tilemachos — 2. Foka Lambrini 3. Pyrinas Efstratios — 3. Ioannou Nikolaos 4. Lambrinidis Lambros 5. Manitsas Dimitrios 6. Mariou Dimitrios 7. Zafaroglou Georgios 8. Koutsoumanis Georgios 9. Angelopoulos Athanasios 10. Tsoulkanis Georgios 11. Ilias Vasileios 12. Saltaris Argyrios 13. Stavros Tsolakis 14. Markianos Ioannis 15. Evangelia Pagonis 16. Konstantinos Manitsas 17. Filaretou Argyri 18. Georgios Ioannis 19. Stratigentas Sotirios 20. Chrysafis Nikolaos 21. Chondrogiannis Vasileios 22. Ziliachovinos Issak Ioannis Koutlas, an employee of the Municipality, was also present at the meeting to keep the minutes. The President proposed the discussion of the topic: "On the issuance of a resolution for the CO_2storage project in Prinos, Thasos." Before the start of today's agenda for the Municipal Council meeting, he characterised it as "urgent". The Municipal Council, having taken into consideration • The President's proposal • The relevant provisions of Article 67, paragraph 7 of Law 3852/2010. DECIDES UNANIMOUSLY To discuss the issue outside the agenda of the regular meeting, as provided for in the provisions of Article 67, paragraph 7 of Law 3852/201.	*environment",* it should be noted that the issue of the potential impact of the project on tourism and fisheries was examined (among other things) in **Comment 19.12.** In addition, the potential adverse effects on marine and terrestrial animal and plant organisms in the area, on habitats and on institutionally protected areas of ecological interest are examined in detail in **Section "10.2.4 Impacts on the Natural Environment"** of the EIA, as well as in **the SEA** (Special Ecological Assessment Study of the CO_2Storage Unit in Prinos in the SPA & SCI GR1150014, SPA GR1150001, SAC GR1150010 and SPA GR1150012 of the Natura 2000 Network) included in Annex 17.1 of the EIA. The above analyses demonstrate that under no circumstances are adverse effects expected on the marine and terrestrial animal and plant organisms of the area, on habitats and on institutionally protected areas of ecological interest. Therefore, as thoroughly documented in the relevant **Sections** of **Chapter 10** of the EIA, no significant impacts on tourism and the rich natural environment of the area are expected from the implementation and operation of the proposed project.

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					In accordance with the above, after a quorum was established – as 22 of the 25 members were present – the President declared the meeting open and proposed the discussion of the 1item not on the agenda and proposed the adoption of a resolution on the CO2 storage project in Prinos, Thasos. The President stated that the Municipality of Thasos had submitted a resolution on the CO_2 storage project in Prinos, Thasos, which stated the following: The Municipality of Thasos, as the highest state institution in the area, with a sense of responsibility towards the present and future of our region, clearly cannot agree with and opposes the implementation of the CO_2project in the submarine area of Prinos, Thasos. The risks that such a project may entail, whatever the intentions of those who decided on it and those who will carry it out, cause us, the inhabitants of this place, intense and justified concerns and fears, which prevent us from accepting this project. We fully understand the theories regarding the need to store $CO_{(2)}$;we simply believe that such projects cannot be carried out near tourist destinations with a rich natural environment. The Municipal Council, as the highest political body of our Municipality, is called upon to express its opinion with seriousness and responsibility, as its role dictates, taking into account the will of the citizens beyond any scientific data. The proposal of the Municipal Administration, as publicly expressed by the Mayor of Thasos, is the public expression of our opposition to the implementation of this project, with parallel actions aimed at obtaining opinions from lawyers and scientists of other specialties in order to fully understand the overall dimensions of this project. The President stated that bodies of the Municipality of Thasos, under the name SYNERGY FRONT, have submitted the following resolution on the above issue: As collective bodies of Thasos, we recognise the need to create a front to strengthen, with all our forces, the resistance of the society of Thasos and the wider region to the implementation of the CO_2storage project in Prinos. Given that this is a project that not only fails to promote development and serve national interests, but also contradicts the positions of the scientific community, it will: - It will turn us into Europe's rubbish dump. - It threatens us with a large-scale industrial accident - It degrades our lives and the environment. - It will devalue our property, destroy tourism, fishing and our entire economic life. - It serves speculative interests that will be detrimental to citizens and future generations. We declare that We will fight with unity and determination at the institutional, legal and movement levels to prevent the implementation of this undesirable project, forming a front to defend the collective interest. We declare our presence at the Municipal Council meeting on Wednesday, 12 February, at 5 p.m., with the demand that the decision to reject the project be officially taken, as publicly expressed by the Mayor and the President of the Municipal Council. The decision should be sent to all the relevant bodies and immediately submitted for consultation to the relevant ministry. We request that the Municipality of Thasos immediately set up an independent scientific and legal committee to provide opinions and documentation for the Municipality's participation in the consultation and in the ongoing struggle to cancel the project. We call on the people of Thasos to sign the resolution and contribute with all their strength to the common struggle. Declarations of participation in the struggle: The Popular Rally of Thasos faction also submitted its own resolution, which states the following: RESOLUTION ON THE PLANNED CREATION OF A CO_2STORAGE FACILITY IN THE PRINOS DEPOSIT The municipal council of Thasos is categorically opposed to any plans and efforts to create a CO_2 storage facility off the coast of Prinos. Last week, at a briefing organised by the Technical Chamber of Greece, the people of the island responded en masse with one voice that they would not allow these plans by Energian and the government to go ahead.	

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					The issue of creating a CO_2 storage facility in the Prinos deposit has been in the news for years and has been particularly intense recently. It is presented as a "solution" to the issues posed by climate change in order to meet the "targets" for reducing CO_2 from industry. The case of Prinos is presented as a "pilot" project, a "pioneering" initiative in the entire south-eastern Mediterranean, with a corresponding "circle of interest". With these guidelines, central and local authorities and their people are promoting the plan, and of course, first and foremost, the company that has secured the first "package" of funding from the Development Fund. Overall, our people, but also our region, have accumulated significant experience. The "investment plans" that are moving forward are in line with the strategic objectives of monopolistic competition. Their sole guiding principle is to ensure capitalist profitability by any means necessary. In their path, they sweep away labour relations, workers' rights and the environment. The people of Thasos have no confidence and no reassurance when we are told about the "security" and "benefits" of this investment. Who will guarantee all this? The company that is throwing hundreds of workers out onto the street because they refused to accept cuts to their wages and rights. The company that exercises its "corporate social responsibility" on the children of those who have been laid off. That does not even return what it is obliged to - crumbs, anyway - to the regional level (as highlighted by the "People's Rally"). The company that looks after its business in the blood-stained waters of the south-eastern Mediterranean, having billion-euro agreements with the state - the murderer of Israel and others. The "investment" being promoted is yet another page in the "gospel" of sinful "green growth". It is the plan that brought about the energy exchange, the benefits of which we see in our bills every month, The plan that devalued the country's great energy potential. It is characteristic that the "investment" comes to implement part of the corresponding "pollutant exchange". Their "ecology" goes as far as "the polluter pays". How far-sighted and "environmentally friendly" is the "solution" that does not in the least disturb the emissions themselves, but says "we will collect them, transport them by ship and pipeline, and deliver them to Prinos"? The 1.5 billion that Energean and other groups involved aspire to pocket will determine whether the method is safe, whether it affects the sea, the flora, the pipelines, etc. Or will the state of Tembi ensure this? We are convinced that this investment undermines local small and medium-sized businesses in tourism and fishing, creates incalculable risks for the marine area, for workers and their lives. THE MUNICIPAL COUNCILLORS OF THE POPULAR COALITION OF THASOS. 12/2/2025 The President then called on the body to decide on the matter. The Board, having taken into consideration: • the President's proposal. • The resolution submitted by the administration of the Municipality of Thasos, the resolution submitted by the Popular Rally of Thasos faction of the Municipality of Thasos, and the resolution of the SYNERGY OF THE FRONT • the provisions of Article 65 of Law 3852/2010, and following a dialogue DECIDES BY MAJORITY Approves the resolution submitted by the Thasos Municipal Administration as follows The Municipality of Thasos, as the highest state institution of the region, with a sense of responsibility towards the present and future of our region, clearly cannot agree and opposes the implementation of the CO_2project in the underwater area of Prinos, Thasos. The risks that may arise from such a project, whatever the intentions of those who decided on it and those who will carry it out, cause us, the inhabitants of this place, intense and justified concerns and fears, which prevent us from accepting this project. We fully understand the theories regarding the need to store $CO_{(2)}$;we simply believe that such projects cannot be carried out near tourist destinations with a rich natural environment. The Municipal Council, as the highest political body of our Municipality, is called upon to express its opinion with seriousness and responsibility, as its role dictates, taking into account the will of the citizens beyond any scientific data. The proposal of the Municipal Administration, as publicly expressed by the Mayor of Thasos, is the public expression of our opposition to the implementation of this project,	

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					with parallel actions aimed at obtaining opinions from lawyers and scientists of other specialties in order to fully understand the overall dimensions of this project. Municipal Councillors Chrysafis N., Lambrinidis L., Pagonis E., Filaretou A., and Chondrogiannis V. approve the resolution submitted by the Thasos People's Rally. This decision was numbered 7/2025. After being read, these minutes are signed as follows: The Chairman of the Board Dimitrios Pipinis The members 1. Konstantinos Manitsas 2. Kalafatis Tilemachos 3. Saltaris Argyrios 4. Pyrinas Efstratios 5. Lambrinidis Lambros 6. Manitsas Dimitrios 7. Mariou Dimitrios 8. Zafaroglou Georgios Exact excerpt Thasos 13/02/2025 The Chairman of the Board Dimitrios Pipinis 9. Koutsoumanis Georgios 10. Pagoni Evangelia 11. Angelopoulos Athanasios 12. Vassilios Chondrogiannis 13. Tsoulkanis Georgios 14. Vasileios Ilias 15. Tsolakis Stavros 16. Stratigentas Sotirios 17. Georgios Ioannis 18. Filaretou Argyri 19. Chrysafis Nikolaos 20. Vassilios Chondrogiannis 21. Ziliachovinos Issak	
44	Konstantinos	HCM	25/02/2025	Positive	It is impressive that such an innovative project will be implemented in Greece. It is so much more environmentally friendly than oil production, and the fact that it will be undertaken by the company that did well with the latter gives me great confidence in the former. I believe we should support this project because it will bring multiple benefits both to the Kavala region and to the whole country. I hope it succeeds so that we can implement it in other parts of the country as well.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum.
45	Katerina	HIM	25/02/2025	Positive	The opposing views on the project, those that have no basis, start from the premise that "if something happens, we will be destroyed". This is an unfounded prejudice, as according to the EIA, any unlikely accidents would be characterised as practically negligible, minor in intensity, purely localised within the facilities and immediately reversible. $CO_2$is NOT flammable, does not create ... stains like oil, and can only become toxic if someone is exposed to an emission/leak and inhales large quantities. Managing liquefied $CO_2$is child's play compared to managing oil.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
46	Ioanna	HCM	25/02/2025	Positive	This project is of enormous importance to our industry and everything it represents in socio-economic terms, with some 400,000 jobs and a contribution of almost €20 billion to GDP. If we prevent $CO_{(2)}$storage,an action that is so strongly promoted by the global community, we are unwittingly undermining the future of the next generations. The climate crisis is here, it has been identified, it has been quantified and it is already	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.

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					affecting us. The industrial processes that have so advanced human society have also produced CO_2,which appears to be clearly linked to the rise in the average global temperature. Our response must be as immediate as possible, and existing abandoned hydrocarbon deposits are the most appropriate and technologically mature option for mitigating climate change. We cannot afford to adopt the utterly reprehensible NIMBY (not in my back yard) approach. Of course, this means that we must undertake this activity in conjunction with all the control, monitoring and safety measures required by European and national legislation, so that the activity does not constitute a 'risk'. This is what all advanced European countries do.	
47	Panagiotis	HIM	25/02/2025	Neutral/Unclear	All of you in Thasos who have made your fortune from tourism and marble, destroying the environment and beauty of the island as you have built it, are now preaching about the environment. We and our fathers have worked in the oil industry for 45 years and we have not hindered the development of tourism in Kavala and Thasos, nor fishing. There have been zero environmental incidents thanks to us working all these years. Anyone who threatens our work and our families' livelihoods will find us standing in their way. We will be on the ferries in Keramoti on Good Friday and May Day. And if any tourists cross over to Thasos, write to us. Shame on you!	This comment is the opinion of the author and is not related to the contents of the EIA under consideration. Therefore, it does not need to be addressed in this Memorandum.
48	Chrysanthi	HIM	25/02/2025	Neutral/Unclear	Instead of wasting their time on impressive gestures, the Municipality of Thasos and the well-known objectors could have already invited the State and the company making the investment to discuss the reciprocal benefits of the project. But where is the sense in that? Kyriakidis attended the KKE workshop and listened attentively, while he walked out of the TEE workshop!	This comment is the opinion of the author and is not related to the contents of the EIA under consideration. Therefore, it does not need to be addressed in this Memorandum.
49	CHARIS	HIM	25/02/2025	Positive	The CO_2 storage project in Prinos is completely safe and based on technology that has been successfully implemented internationally. The concerns expressed are exaggerated and unfounded, as we are talking about a company with vast experience in the field of hydrocarbons. Furthermore, it is a pioneering project for the country, which not only helps industry reduce CO_2 emissions, but also contributes to the green transition, while allowing industries to retain a large number of employees. With the development of (CCS) technologies in the region, air quality will improve, which will have a positive impact on residents. This project is a huge opportunity for Greece to enter the field of CO_2 capture and storage and maintain a competitive and sustainable industry.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
50	Gianna	HIM	25/02/2025	Positive	I am copying from the interview in the newspaper THASIAKI with Vasilis Gagani, Associate Professor of Metallurgy at the National Technical University of Athens, for both believers and sceptics to read: -Why was Prinos chosen for $CO_{(2)}$storage and how safe is it as a location? -The Prinos area, geologically known as the "Prinos basin", has a number of independent reservoirs of varying sizes. The "Prinos" reservoir is perhaps the best known, as it has been producing hydrocarbons since the late 1970s. During this long period of production, a great deal of data has been collected, allowing us to have a particularly accurate knowledge and understanding of this underground reservoir. Let us consider that an underground reservoir is not accessible; we will never be able to see it, either through physical observation or with a camera. Instead, studying the behaviour of the reservoir by observing production (quantities of liquid oil and gas) and the prevailing pressure over a long period of time is the methodology used to understand what the reservoir is like. The information collected is used to develop computational models that give us the shape and properties of the reservoir, as well as the pressure prevailing at each point at any given time. The computational models are then used as the appropriate tools for studying and determining the optimal and safest process for exploiting the reservoir, whether it involves producing hydrocarbons from the reservoir to the surface, or carbon dioxide injection from the surface into the reservoir. Specifically for the case of Prinos, a preliminary study was recently carried out by EAGME (then IGME) and EKETA, commissioned by PPC, which proposed the sedimentary basins of Northern Greece as suitable geological formations for storage. Specifically, the basins of Prinos (both the oil reservoir and the aquifers of the entire basin), Thessaloniki and the Mesohellenic Trough were proposed as suitable areas. Consequently, a carbon dioxide storage project in this specific "old" reservoir can be designed with precision, optimising the result and ensuring maximum safety not only during injection but also over the centuries to come, as strictly required by European legislation.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.

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51.1	John	HMP	25/02/2025	Negative	It is difficult to see what benefit this carbon capture and storage project could bring to the residents of Thasos and Kavala. The main beneficiary would be the oil company that proposed the project, but industrial complexes that produce carbon dioxide would also benefit if they could continue operations that would otherwise have to be shut down or avoid the need to develop and invest in new technologies and processes.	For the benefits of implementing the project, please refer to **Section '4.1.3 Expected Benefits at Local, Regional and National Level'** of the EIA. For the economic and social footprint of Energean's activities and the proposed project, please refer to **Comment 32.2**.
51.2	John	HMP	25/02/2025	Negative	Furthermore, the proposal turns Thasos into a landfill site for industrial waste, which could damage the tourist trade on which the island depends. CO_2 is a gas that can harm the environment and our health; serious exposure can be fatal. Therefore, the safety of CO_2, whether during transport or storage, is crucial, especially given that the area has significant seismic activity.	As mentioned above, this comment is inaccurate in stating that the project involves the transport and management of waste (let alone 'industrial waste' as mentioned in the comment), as CO_2 is not waste, but a product of all fossil fuel combustion (coal, oil, petrol, natural gas, etc.), but also of wood, plastics and other organic compounds, as well as from a number of natural processes (decomposition of organic substances, volcanic activity, dissolution of carbonate rocks). It is also produced during the respiration of all plants and animals and by fungi and microorganisms that depend directly or indirectly on plants for their food. Finally, $CO_{(2)}$is not only found throughout the natural environment, but also in popular commercial products. $CO_2$is not a waste product but a greenhouse gas, i.e. it contributes to the retention of solar radiation in the atmosphere, resulting in an increase in temperature. However, this property does not make it a waste product. The greenhouse gases with the highest concentration in the atmosphere are pure water ($H_{(2)}O$) and SF6 (sulphur hexafluoride), a colourless, odourless, non-toxic and very stable gas with excellent insulating properties, which is used in particular in high-voltage energy management equipment (such as switches, transformers, circuit breakers). Consequently, SF6 gases cannot be defined as 'waste'. Indeed, it is important to note that the $CO_2$to be stored under the proposed project must meet specific requirements as set out in the relevant EU Directives (for example, DIRECTIVE 2009/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC and 2008/1/EC, and Regulation (EC) No 1013/2006) and Quality Standards (indicatively ISO 27913:2024 'Carbon dioxide capture, transportation and geological storage — Pipeline transportation systems'). According to EU Directive 2009/31/EC, the CO_2stream consists mainly of carbon dioxide and no other materials may be added except for traces of related substances from the source. In the Prinos project, purity has been set at 99%. This is checked both during loading and upon receipt of the dioxide at the storage facilities. There is close cooperation between the companies that emit carbon dioxide and the company that receives it for storage to ensure that this requirement is met. The study and assessment of the potential risks of CO_2into the ground and proof of the integrity of the CO(2) storage facilities are included in the studies prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO(2) Storage in the Prinos Reservoir." The findings and conclusions of these technical studies and simulations, concerning the potential risks of $CO_{(2)}$injection into the ground and proof of the integrity of the CO2 storage facilities, are included in the project's EIA. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT' of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure.
51.3	John	EIA	25/02/2025	Negative	If people are forced to host a project like this, which brings them no benefit, then they have the right to demand the highest possible standards of design, construction and maintenance. However, it seems that such a demand cannot be met.	This comment is the author's position **against the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
51.4	John	HMP	25/02/2025	Negative	In terms of applicability and design, the lack of hard data means that theoretical models and computer simulations must be based on assumptions that may not be justified; commercial interests could also interfere. The authors of the Environmental Impact Assessment acknowledge that there are risks associated with the project, but they firmly assert that these risks could be reduced to a low level of significance with appropriate mitigation procedures. However, such procedures, if any, are attempts to effectively deal with disasters after they occur. No procedure can prevent an earthquake. And a high level of maintenance will be required, not just for decades or centuries, but for millennia.	The project design has been implemented through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2Storage in the Prinos Reservoir." The EIA includes the conclusions of these studies, which are considered useful by the researchers for the implementation of the EIA process, as, on the one hand, there is no requirement for them to be included as such in the project's EIA (nor would it be useful), and on the other hand, due to their highly technical nature, these studies are duly approved by specialised scientific personnel of the competent licensing and supervisory authorities and are not subject to public consultation. However, it should be noted that these studies have been submitted, reviewed and approved by specialised scientific personnel from the competent licensing and supervisory authorities. **Chapter 11** of the EIA includes measures to prevent/mitigate/address potential adverse effects, so that these effects are at least minor and manageable. With regard to project maintenance issues, it should be noted that, in accordance with existing EU and national legislation, responsibility for the management of the implementation and operation of the project lies with both

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						during the operation of the facility (i.e. for up to 25 years, initially, years, but also for any extension, if the storage capacity allows it) and for a further period of 20 years after the closure of the facility, **the operator.** After 20 years following closure, and provided that all available data indicate that **the stored CO_2 will be kept completely and permanently isolated** (Article 18 of the relevant Directive 2009/31 of the European Parliament and Article 19 of the existing national legislation), the storage facility shall be handed over to **the competent authority (Greek State)**.
51.5	John	HMP	25/02/2025	Negative	Under the current proposal, responsibility for the safe operation of the facility lies with an oil company that exists to make a profit; it does not exist to benefit the local community or the wider world or the environment. For the sake of the company's profits, the populations of Thasos and Kavala are being burdened with a project that offers only disadvantages and uncertainty and is managed by an organisation that does not have their interests at heart. The project should be rejected.	This comment is the author's position **against the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
52	Apostolos	HIM	25/02/2025	Positive	Those who heard Sofia Stamataki, professor at the Polytechnic University, speak on ERA Kavala last week understood a lot about the project – unless, of course, they are misinformed or serving vested interests. The production of oil with hydrogen sulphide, which has been going on for 45 years now in the Gulf of Kavala without any problems, is clearly a more serious activity than $CO_{(2)}$management. When oil production began in the early 1980s, Thasos was clearly not the tourist destination it is today. It became what it is today, with oil production operating alongside it, without any problems.	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be addressed in this Memorandum.
53.1	Vasiliki	HIM	25/02/2025	Negative	- No to the construction of a CO_2storage facility in Prinos. Its economic viability is based on the logic of 'I produce CO_2 - I store CO_2 ', without addressing the already high concentrations of greenhouse gases in the atmosphere. At best, what can hypothetically be achieved is a reduction in the quantities of industrially produced CO_2 , although this is difficult as the specific process (CO_2 storage) essentially encourages the continued use of fossil fuels, at current or even higher than current levels, rather than reducing emissions.	CCS chain projects are clearly **costly** and **not very capital efficient**. For this very reason, European countries are approving billions of euros in subsidies to ensure that these projects are implemented, as storage is currently the most effective, safe and cheapest method of reducing carbon dioxide emissions. In this context, CCS projects are included in the proposed measures to achieve climate neutrality, both in the context of national strategies and European policies. It should be noted that the implementation of Carbon Capture and Storage (CCS) projects is a technical/regulatory/economic measure with code **'M38 - Decarbonisation of industry through the promotion of carbon capture and storage (CCS) technologies,** with the aim of "Reducing emissions in the industrial sector" of the revised NECP. It should also be noted that the European Parliament has included investments in carbon capture and storage in the EU list of "**green" investments, known as the EU Taxonomy, while on the other hand it has included the relevant technologies in the Strategic Technologies for Europe Platform (STEP).** According to Article 2(1) of the STEP Regulation, clean and resource-efficient technologies include zero net emission technologies as defined in Article 4 of the NZIA. The **NZIA** Regulation is Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13June 2024, establishing a framework for measures to strengthen Europe's net-zero emission technology ecosystem and amending Regulation (EU) 2018/1724'. Article 4 of the NZIA, which presents the "List of net-zero emission technologies", also includes "Carbon capture and storage technologies". It follows from the above that the comment's assertion that CCS projects "*encourage the continued use of fossil fuels, at current or even higher than current levels, rather than reducing emissions*" is in no way valid. On the contrary, the international scientific community and the relevant national and European institutional authorities consider CCS projects to be 'green investments' using clean and resource-efficient technologies, prioritise and subsidise them, recognising that they are currently the most effective, safe and cheapest method of reducing carbon dioxide emissions. The project contributes **directly and positively** to reshaping the country's development orientation, as it is a "clean and resource-efficient" investment. It should be noted that the European Parliament has included investments in carbon capture and storage in the EU's list of **'green' investments, known as the EU Taxonomy, while on the other hand it has included the relevant technologies in the Strategic Technologies for Europe Platform (STEP).** According to Article 2(1) of the STEP Regulation, clean and resource-efficient technologies include zero net emission technologies as defined in Article 4 of the NZIA. The **NZIA** Regulation is Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13June 2024, establishing a framework for measures to strengthen Europe's net-zero emission technology ecosystem and amending Regulation (EU) 2018/1724'. Article 4 of the NZIA, which presents the "List of net-zero emission technologies", also includes "Carbon capture and storage technologies". Finally, it should be noted that the project under consideration also contributes **indirectly** to the reform of the country's development orientation, as the operation of the CCS project gives Greek industries with GHG emissions the opportunity to make the necessary adjustments in a less "violent" way and become climate neutral and economically viable at the same time. In this way, the climate transition is achieved in a socially milder way that will not lead to adverse social impacts if it achieves the necessary goal of climate neutrality.
53.2	Vasiliki	HMP	25/02/2025	Negative	By focusing exclusively on industrial CO_2emissions, it overlooks the fact that the greatest atmospheric pollution is caused by natural disasters or, essentially, human activities (forest fires, wars, etc.).	This comment is the author's position **against the implementation of the project**, without, however, including arguments regarding the contents of the EIA. Therefore, it cannot be answered in the context of this Memorandum.

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53.3	Basilica	HIM	25/02/2025	Negative	As far as the country is concerned, the question remains as to how the project will contribute to the CO_2emissions balance, as the largest volume of gas to be stored will probably be imported from other countries. As such, the project cannot be considered to contribute to the country's 'green transition', a key pillar of which is recycling. $CO_{(2)}$recycling can be achieved either naturally (by planting trees) or through chemical sequestration (conversion into other molecules/products with high added value). Therefore, $CO_{(2)}$storage is not a developmental process, as it lacks innovation and does not produce a product, while the benefits to the national economy (excessively low annual rent) and the local community (few new jobs, of unknown duration and possibly involving imported technical personnel) are negligible.	It is not clear to the authors of this memorandum how it follows that *"the largest volume of gas to be stored will probably be imported from other countries"*. This cannot be known at the current stage of development of this project. However, on the one hand, this is not the subject of the EIA under consideration, and on the other hand, something like this is not particularly likely. For the issue of the importance of CCS projects in national climate planning and in the corresponding EU policies, see **Comment 19.10**. For the economic and social footprint of Energean's activities, please refer to **Comment 32.2**.
53.4	Vasiliki	HMP	25/02/2025	Negative	At the same time, serious potential risks and environmental impacts are associated with the project, both during construction and operation. According to the EIA, it is estimated that approximately 23 million tonnes (23MT) of $CO_{(2)}$ will bestored in a natural/geological oil reservoir system covering a total area of 256.86 square kilometres. This system occupies most of the central-western Gulf of Kavala and is located a short distance from both the coast of Kavala and Thasos, and therefore from densely populated areas. Given the above, the following question arises: How is the geological behaviour of a liquid hydrocarbon reservoir, such as that of Prinos, affected by the storage within it, under high pressure, of material with completely different physicochemical properties? The EIA itself states (p. 10-83) that "theoretically, the injection of $CO_{(2)}$into geological formations can increase the pressure within the rock formations, potentially causing seismic events." Of course, the risk is considered to be "... minimal, provided that the operation is carried out in accordance with the planned injection rate and within the framework of safe operation" and always in accordance with the models and simulations of Energean's technical team (sic). It should be noted that the EIA implies uncertainty about the methodology and injection parameters to be used (p. 6-44), a process which, as mentioned above, is critical to the safety of the project. Even if, from a technical point of view, the risk of failure that could lead to a large $CO_{(2)}$leak into the marine environment and the atmosphere is minimised, this could still occur due to natural causes, specifically seismic activity.	Regarding the question in the comment, *"How is the geological behaviour of a liquid hydrocarbon reservoir, such as the Prinos reservoir, affected by the storage of material with completely different physicochemical properties inside it and under high pressure?"*, it should be noted that for the purposes of licensing the project within the framework of the "Application for $CO_{(2)}$Storage in the Prinos Reservoir", a series of technical studies and simulations were prepared and submitted to the competent state agency (EDEYEP). These include **a geochemical study** evaluating the geochemical reaction of CO_2 with the minerals of the rocks and fluids of the geological formation, which showed that the expected geochemical changes will be minimal as a result of the characteristics of the geological formations. The seismicity of the area under study has been thoroughly investigated in the study entitled ***"Seismotectonic Investigation of the Kavala Area - Geometry and Kinematics of Active Structures based on Seismological, Geological and Geodetic Data"*** conducted by the **Geodynamic Institute of the National Observatory of Athens.** In summary, the above study examined the historical and instrumental seismicity of the Prinos basin and surrounding areas (Orfanos basin, Thasos, wider Kavala area). According to the study's conclusions, the Prinos basin, in relation to the surrounding areas (Northern Aegean, Chalkidiki, etc.), is characterised by **reduced seismicity.** The implications arising from the project's vulnerability to risks of serious accidents or disasters related to the project (including the project's vulnerability to phenomena related to the seismicity of the area) are discussed in **Section 10.4 IMPACTS RESULTING FROM THE PROJECT'S VULNERABILITY TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT**, which shows that there are no significant risks to the implementation and operation of the project due to seismicity.
53.5	Vasiliki	HMP	25/02/2025	Negative	In the EIA, the suitability of the area as a CO_2storage site is based on its low seismicity. However, considering the high seismic potential of the Greek territory, the recent intense seismic activity in Athos, the proximity of the area to the Anatolian fault (North Aegean trench), as well as the currently inactive faults crossing the Gulf of Kavala, the possibility of a strong earthquake cannot be ruled out. A strong seismic tremor, even at a distance from the reservoir, could cause instability in its structure, which will in any case be subject to high internal pressures from the stored $CO_{(2)}$,resulting in uncontrolled leakage. This scenario does not necessarily concern the near future, as the 25 MT of $CO_{(2)}$stored will be inherited by future generations. It is worth noting that, according to the study itself, it will take between 500 and 1,000 years for $CO_{(2)}$ to begin to be sequestered through geochemical processes.	The seismicity of the area under study has been thoroughly investigated in the study entitled ***"Seismotectonic Investigation of the Kavala Area - Geometry and Kinematics of Active Structures based on Seismological, Geological and Geodetic Data"*** conducted by the **Geodynamic Institute of the National Observatory of Athens**. According to the seismotectonic investigation of the Kavala-Prinos area by the Geodynamic Institute, National Observatory of Athens (NOA), there are five (5) active faults. Based on the available data on the most significant seismic events recorded in the wider area, within a radius of approximately 50 km (or more) from the Project under study during the years 2016-2023, the closest earthquake to the activity under study occurred on 08/12/2017 with an epicentre 28.3 m northwest of Serres and a magnitude of 3.8 on the Richter scale. In summary, the above study examined the historical and instrumental seismicity of the Prinos basin and surrounding areas (Orfanos basin, Thasos, wider Kavala area). According to the study's conclusions, the Prinos basin, in relation to the surrounding areas (Northern Aegean, Chalkidiki, etc.), is characterised by **reduced seismicity.** The implications arising from the project's vulnerability to risks of serious accidents or disasters related to the project (including the project's vulnerability to phenomena related to the seismicity of the area) are discussed in **Section 10.4 IMPACTS RESULTING FROM THE PROJECT'S VULNERABILITY TO RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT**, which shows that there are no significant risks to the implementation and operation of the project due to seismicity.
53.6	Vasiliki	HMP	25/02/2025	Negative	In addition to the above, significant environmental impacts are expected, both during construction and operation of the project, which will affect marine fauna and flora in the area. These relate to waste from the four planned boreholes, as well as disturbance of the seabed from the installation of the pipeline.	The potential adverse impacts on marine and terrestrial fauna and flora in the area, on habitats and on institutionally protected areas of ecological interest are examined in detail in **Section "10.2.4 Impacts on the Natural Environment"** of the EIA, as well as in **the SEA** (Special Ecological Assessment Study of the CO_2Storage Facility in Prinos in the SPA & SCI GR1150014, SPA GR1150001, SAC GR1150010 and SPA GR1150012 of the Natura 2000 Network) included in Annex 17.1 of the EIA. The above analyses demonstrate that under no circumstances are adverse effects expected on the marine and terrestrial animal and plant organisms of the area, on habitats and on institutionally protected areas of ecological interest.
53.7	Vasiliki	HMP	25/02/2025	Negative	The EIA itself mentions possible impacts on fish fauna during the construction of the project. Specifically: "(a) Noise from the works may cause fish to avoid the area. (b) Many fish species use sounds to communicate, especially during reproduction. Increased noise may affect this communication, reducing fertility and reproductive success. (c):	The impacts mentioned in the comment are not the impacts that will actually be recorded on the fish fauna during the construction of the project, but the **potentially possible impacts** (based on the literature) whose occurrence is probable and are examined in the context of the project's EIA. To be precise, these potential impacts concern certain species of fish fauna examined in the project's SEA. However, after assessing the above potential impacts,

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					Continuous noise may cause stress to fish, affecting their growth, health and behaviour. (d) Reduced visibility: Increased turbidity can make it difficult to find food, as many fish rely on sight to locate their prey. This can affect their growth and survival. (e) Reproduction: Turbidity can affect breeding areas, especially for species that lay their eggs in specific areas of the seabed. Egg deposition may be negatively affected, reducing fertility. (f) Respiration: High turbidity may affect gill function, making respiration more difficult and increasing the energy cost of survival.	the study concludes that, in terms of their overall characterisation, these impacts are assessed as being **of low** significance.
53.8	Basil	HMP	25/02/2025	Negative	Furthermore, during the operation of the project and with regard to the treatment of seawater from the pumping wells, the EIA states that "the impacts may be related to: (a) Temperature changes: If the treated water has a different temperature from the seawater, it may create temperature zones that affect the behaviour and distribution of fish. (b) Changes in the ecosystem: The discharge of large quantities of water may affect the structure and functioning of marine ecosystems, affecting the habitats of fish and other marine organisms." It is worth noting here that 2,400 tonnes of water per day are expected to be pumped during the first six years of operation, increasing to 2,900 tonnes per day in subsequent years. This is therefore a large amount of water, contaminated with pollutants that were not removed during 'treatment', which will undoubtedly affect marine life in a significant area around the offshore facilities.	Similarly, as in the previous comment (**53.7**) the impacts referred to in the comment are not the impacts that will actually be recorded on the fish fauna during the operation of the project, but the **potentially possible impacts** (based on the literature) whose probability of occurrence is possible and are examined in the context of the project's EIA. To be precise, these potential impacts concern certain species of fish fauna examined in the project's MEIA. However, after assessing the above potential impacts, the study concludes that, in terms of their overall characterisation, these impacts are assessed as being of **low** significance and will in fact contribute **positively** to the status of these species. Furthermore, the quantities of water pumped referred to in the comment do not apply in reality. As described in **Section '6.3.3.4.2 Water production wells',** the evolution of water well operation is expected to be as follows, according to simulation studies: • The two water production wells will operate at a production rate of up to 7,500 bwpd each during the period 2025-2030 (6 years). • Water production will increase to 9,000 bwpd per well in 2031 and until the end of the Project. • The capacity of 7,500 bwpd/well is achieved by operating the electric submersible pump (ESP) at 83% of its capacity, while the capacity of 9,000 bwpd/well is attributed to the operation of the electric submersible pump (ESP) at 100% of its capacity. To make the quantities easier to understand, it should be noted that 9000 bwpd (Barrels Of Water Per Day) = 59.62 m^3 /h. The water quantities to be pumped will be treated before being discharged into the marine environment and will be free of all possible pollutants. Indicatively, the EIA states: *"The water production wells on the Beta platform will be equipped with electric pumps, which will extract water from the reservoir. It is expected that the water produced from the storage project will undergo the same treatment as that currently in operation through oil separators on the Delta platform. The appropriately treated water will be discharged into the sea. However, the treatment required will be further investigated after water samples from the aquifer at the storage complex have been taken and analysed."* It is therefore clear that the claim in the comment "*large quantities of water, contaminated with pollutants that were not removed during 'treatment', which will undoubtedly affect marine life in a significant area around the offshore* facilities" is not accurate.
53.9	Vasiliki	HMP	25/02/2025	Negative	Furthermore, the study fails to mention the quantities and identity of the chemicals that will be used to clean the pipes of organisms that adhere to them. Similarly, the quantities of toxic methanol to be used in the injection process are not mentioned.	The cleaning process for CO_2transport pipelines does not involve the use of chemicals, as is the case with the cleaning of pipelines in the existing facility, which is carried out by passing cleaning pellets through the pipeline multiple times. The specifications for the composition of the $CO_{2\ to\ be}$ obtained set a maximum methanol concentration of 40 ppm (parts per million), an infinitesimal amount, which, on the one hand, is not certain to be contained in the CO_2 to be obtained, and even if it is contained, it cannot in any case be classified as toxic at this negligible concentration. The use of methanol is not envisaged for the operation of the installation.
53.10	Vasiliki	HMP	25/02/2025	Negative	With regard to the possibility of an accident involving CO_2leakage during the storage process, the study notes that "the corrosive conditions associated with increased $CO_{(2)}$ (in water) are likely to have a significant impact on zooplankton calcifying species. Short-term exposure to extreme acidification conditions is sufficient to cause significant damage to shells and deaths in marine gastropods (Bednaršek et al., 2014; Gardner et al., 2018) and commercially important bivalve larvae (Wijsman et al., 2019), resulting in reduced recruitment (Parker et al., 2013)," as well as that "the impacts on coral habitats and rubble bottoms (sic) (tragans) and bivalve reefs may cause long-term damage with possible recovery on a decadal scale." Based on the above, the EIA concludes, rather arbitrarily and essentially contradicting itself ( ), that: "Overall, the negative impact during the operational phase is expected to be localised in the area of the Beta and Delta platforms, and therefore of low significance, as fish will move to areas with less disturbance." Consequently, the study essentially limits the impact of any $CO_{(2)}$leakage on marine organisms (at the local level) to the phenomenon of water acidification, overlooking the fact that COhas a very high solubility in water (up to 30%), in contrast to the solubility of oxygen (6.5 mg/L, or 0.00065%). Consequently, in the event of an accident, there will be mass deaths of fish and other organisms from asphyxiation due to high concentrations of $CO_{(2)}$ in the water. The argument that "fish will move to areas with	The impacts mentioned in the comment are not the impacts that will actually be recorded on marine organisms during the construction of the project, but the **potentially possible impacts** (based on the literature) that are likely to occur and are examined in the project's EIA. To be precise, these potential impacts concern certain species of marine organisms examined in the project's SEA in **Section '2.4 Impacts on the marine ecosystem from accidental $CO_{(2)}$leakage**'. Furthermore, in the continuation of this section of the comment, the confusion is exacerbated when the potential impacts on various marine organisms (zooplankton, marine gastropods, etc.) are confused with potential impacts on fish fauna, revealing contradictions in the EIA and the corresponding SEA. The potential adverse effects on marine and terrestrial animal and plant organisms in the area, on habitats and on institutionally protected areas of ecological interest are examined in detail in **Section "10.2.4 Impacts on the Natural Biotic Environment"** of the EIA, as well as in **the SEEA** (Special Ecological Assessment Study of the CO_2Storage Unit in Prinos in the SPA & SCI GR1150014, SPA GR1150001, SAC GR1150010 and SPA GR1150012 of the Natura 2000 Network) included in Annex 17.1 of the EIA. The above analyses demonstrate that under no circumstances are adverse effects expected on the marine and terrestrial animal and plant organisms of the area, on habitats and on institutionally protected areas of ecological interest. For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF SERIOUS ACCIDENTS OR**

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					less disturbance" assumes that they will survive such an accident. The Thracian Sea, part of which is the Gulf of Kavala, is the main and richest fishing ground in the country, with fishing in the area being an economically important activity at both local and national level. In view of the above and in parallel with the negative impacts of the proposed $CO_{(2)}$storage in Prinos on safety and environmental pollution, the fishing industry is expected to be seriously affected, as will tourism in Thasos and Kavala. In conclusion, the project will not contribute to the development prospects of the wider region, but will instead contribute to its further degradation.	**DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. Based on the documentation in this section and in accordance with the risk studies and simulations carried out in the context of the proposed project, it is estimated that the toxic effects of CO_2 that could potentially cause adverse H&S impacts in the event of a serious accident related to the project or disaster extend to: • ~780 m from the CO_2 receiving point of the onshore pipeline (or approximately 300-350 m from the boundaries of the Sigma industrial facility), in areas that include neighbouring crops, the adjacent fish farm and the pier, but will not reach residential areas or public facilities. • ~1000 m in the area above sea level and a few metres into the sea from the point of the subsea CO^2transport pipeline that may rupture or from the location of the offshore facilities. It is therefore clear that the potential impact in the event of an accident is limited to the facility area and does not affect residential areas and human activities in the region. Furthermore, according to data collected by Energean over a number of years, it has been demonstrated that depleted hydrocarbon fields and related structures have proven storage capacity, a proven impermeable cap to prevent possible leakage of stored fluids, a defined volume of resources suitable for $CO_{(2)}$storage,and are tectonically stable areas. Furthermore, it should be noted that the Prinos basin is a tectonically stable area, as required for $CO_{(2)}$storage areas in terms of tectonic (seismic) activity. Therefore, the scenario of $CO_{(2)}$leakage from the reservoir itself during the operation of the Project is unlikely. As for possible leakage from the pipeline, this can be prevented by the planned inspection of the pipeline using a smart tool (pigging), which measures the thickness of the pipeline wall (every 5 years or in other cases of system shutdown) and by the planned monitoring system. **In particular, it is recommended that the company proceed with the specification of the $CO_{(2)}$leak monitoring programme,in accordance with its obligations, to ensure that any leak that may occur can be immediately detected and addressed.** It follows from the above that even in the event of an accident, the geographical extent of even the worst possible impact is too limited to cause mass deaths of fish and other organisms from asphyxiation due to high concentrations of CO_2 in the water, as well as significant impacts on fishing and tourism in the area (or any other parameter of the socio-economic environment of the area.
54.1	DIMITRIOS	HIM	25/02/2025	Negative	No to the construction of a CO_2plant in Prinos. Its economic viability is based on the logic of "I produce CO_2- I store CO_2", without addressing the already high concentrations of greenhouse gases in the atmosphere. At best, what can hypothetically be achieved is a reduction in the quantities of industrially produced CO_2 , although this is difficult as the specific process (CO_2 storage) essentially encourages the continued use of fossil fuels, at current or even higher than current levels, rather than reducing emissions.	For a detailed answer to this question, please refer to **Comment 53.1.**
54.2	DIMITRIOS	HIM	25/02/2025	Negative	By focusing exclusively on industrial CO_2emissions, it overlooks the fact that the greatest atmospheric pollution is caused by natural disasters or, essentially, human activities (forest fires, wars, etc.).	This comment is the author's position **against the implementation of the project**, without, however, including arguments regarding the contents of the EIA. Therefore, it cannot be answered in the context of this Memorandum.
54.3	DIMITRIOS	HIM	25/02/2025	Negative	As far as the country is concerned, the question remains as to how the project will contribute to the CO_2emissions balance, as the largest volume of gas to be stored will probably be imported from other countries. As such, the project cannot be considered to contribute to the country's 'green transition', a key pillar of which is recycling. $CO_{(2)}$recycling can be achieved either naturally (by planting trees) or through chemical sequestration (conversion into other molecules/products with high added value). Therefore, $CO_{(2)}$storage is not a developmental process, as it lacks innovation and does not produce a product, while the benefits to the national economy (excessively low annual rent) and the local community (few new jobs, of unknown duration and possibly involving imported technical personnel) are negligible.	For a detailed response to this issue, please refer to **Comment 53.3.**
54.4	DIMITRIOS	HIM	25/02/2025	Negative	At the same time, serious potential risks and environmental impacts are associated with the project, both during construction and operation. According to the EIA, it is estimated that approximately 23 million tonnes of (23MT) of CO2 will be stored in a natural/geological oil reservoir system covering a total area of 256.86 square kilometres. This system occupies most of the central-western Gulf of Kavala and is located a short distance from both the coast of Kavala and Thasos, and therefore from densely populated areas. Given the above, the following question arises: How is the geological behaviour of a liquid hydrocarbon reservoir, such as that of Prinos, affected by the storage within it, under high pressure, of material with completely different physicochemical properties? The EIA itself states (p. 10-83) that "theoretically, CO2 injection into geological formations can increase the pressure within the rock formations, potentially causing seismic events." Of course, the risk is considered to be "... minimal, provided that the operation is carried out in accordance with the planned injection rate and within the framework of safe	For a detailed answer to this question, please refer to **Comment 53.4.**

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					operation" and always in accordance with the models and simulations of Energean's technical team (sic). It should be noted that the EIA implies uncertainty about the methodology and injection parameters to be used (p. 6-44), a process which, as mentioned above, is critical to the safety of the project. Even if, from a technical point of view, the risk of failure that could lead to a large CO2 leak into the marine environment and the atmosphere is minimised, this could still occur due to natural causes, specifically seismic activity.	
54.5	DIMITRIOS	HIM	25/02/2025	Negative	In the EIA, the suitability of the area as a CO2 storage site is based on its low seismicity. However, considering the high seismic potential of Greece, the recent intense seismic activity in Athos, the proximity of the area to the Anatolian fault (North Aegean trench), as well as the currently inactive faults crossing the Gulf of Kavala, the possibility of a strong earthquake cannot be ruled out. A strong seismic tremor, even at a distance from the reservoir, could cause instability in its structure, which will in any case be subject to high internal pressures from the stored CO2, resulting in uncontrolled leakage. This scenario does not necessarily concern the near future, as the 25 MT of CO2 stored will be inherited by future generations. It is worth noting that, according to the study itself, it will take between 500 and 1,000 years for CO2 to begin to be sequestered through geochemical processes.	For a detailed answer to this question, please refer to **Comment 53.5.**
54.6	DIMITRIOS	HIM	25/02/2025	Negative	In addition to the above, significant environmental impacts are expected, both during the construction and operation of the project, which will affect marine animal and plant organisms in the area. These relate to waste from the four planned boreholes, as well as disturbance of the seabed from the installation of the pipeline.	For a detailed response to this issue, please refer to **Comment 53.6.**
54.7	DIMITRIOS	HIM	25/02/2025	Negative	The EIA itself mentions possible impacts on fish fauna during the construction of the project. Specifically: "(a) Noise from the works may cause fish to avoid the area. (b) Many fish species use sounds to communicate, especially during reproduction. Increased noise may affect this communication, reducing fertility and reproductive success. (c) Continuous noise may cause stress to fish, affecting their growth, health and behaviour. (d) Reduced visibility: Increased turbidity can make it difficult to find food, as many fish rely on sight to locate their prey. This can affect their growth and survival. (e) Reproduction: Turbidity can affect breeding areas, especially for species that lay their eggs in specific areas of the seabed. Egg deposition may be negatively affected, reducing fertility. (f) Respiration: High turbidity may affect gill function, making respiration more difficult and increasing the energy cost of survival.	For a detailed answer to this question, please refer to **Comment 53.7.**
54.8	DIMITRIOS	HIM	25/02/2025	Negative	Furthermore, during the operation of the project and with regard to the treatment of seawater from the pumping wells, the EIA states that " al impacts may be related to: (a) Temperature changes: If the treated water has a different temperature from the sea water, it may create temperature zones that affect the behaviour and distribution of fish. (b) Changes in the ecosystem: The discharge of large quantities of water may affect the structure and functioning of marine ecosystems, affecting the habitats of fish and other marine organisms." It is worth noting here that 2,400 tonnes of water per day are expected to be pumped during the first six years of operation, increasing to 2,900 tonnes per day in subsequent years. This is therefore a large amount of water, contaminated with pollutants that were not removed during 'treatment', which will undoubtedly affect marine life in a significant area around the offshore facilities.	For a detailed response to this issue, please refer to **Comment 53.8.**
54.9	DIMITRIOS	HIM	25/02/2025	Negative	Furthermore, the study fails to mention the quantities and identity of the chemicals that will be used to clean the pipes of organisms that adhere to them. Similarly, the quantities of toxic methanol to be used in the injection process are not mentioned.	For a detailed response to this issue, please refer to **Comment 53.9.**
54.10	DIMITRIOS	HIM	25/02/2025	Negative	Regarding the possibility of an accident involving CO2 leakage during the storage process, the study notes that "the corrosive conditions associated with increased CO2 (in water) are likely to have a significant impact on zooplankton calcifying species. Short-term exposure to extreme acidification conditions is sufficient to cause significant damage to shells and deaths in marine gastropods (Bednaršek et al., 2014; Gardner et al., 2018) and commercially important bivalve larvae (Wijsman et al., 2019), resulting in reduced recruitment (Parker et al., 2013)," as well as that "the impact on coral habitats and rubble bottoms (sic) (tragans) and bivalve reefs may cause long-term damage with possible recovery on a decadal scale." Based on the above, the EIA concludes, rather arbitrarily and essentially contradicting itself, that: "overall, the negative impact during the operational phase is expected to be localised in the area of the Beta and Delta platforms,	For a detailed response to this issue, please refer to **Comment 53.10.**

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					and therefore of low significance, as fish will move to areas with less disturbance." Consequently, the study essentially limits the impact of any CO2 leakage on marine organisms (at the local level) to the phenomenon of water acidification, overlooking the fact that CO2 has a very high solubility in water (up to 30%), in contrast to the solubility of oxygen (6.5 mg/L, or 0.00065%). Consequently, in the event of an accident, there will be mass deaths of fish and other organisms from asphyxiation due to high concentrations of CO2 in the water. The argument that "fish will move to areas with less disturbance" assumes that they will survive such an accident. The Thracian Sea, part of which is the Gulf of Kavala, is the main and richest fishing ground in the country, with fishing in the area being an economically important activity at both local and national level. In view of the above and in parallel with the negative impacts of the proposed CO2 storage in Prinos on safety and environmental pollution, the fishing industry is expected to be seriously affected, as will tourism in Thasos and Kavala. In conclusion, the project will not contribute to the development prospects of the wider region, but will instead contribute to its further degradation.	
55.1	SOFIA	HIM	25/02/2025	Negative	No to the construction of a CO2 plant in Prinos. Its economic viability is based on the logic of "I produce CO2 - I store CO2", without addressing the already high concentrations of greenhouse gases in the atmosphere. At best, what can hypothetically be achieved is a reduction in the quantities of industrially produced CO2 released, although this is difficult as the specific process (CO2 storage) essentially encourages the continued use of fossil fuels, at current or even higher than current levels, rather than reducing emissions.	For a detailed answer to this question, please refer to **Comment 53.1.**
55.2	SOFIA	HUM	25/02/2025	Negative	By focusing exclusively on industrial CO2 emissions, it overlooks the fact that the greatest atmospheric pollution is caused by natural disasters or, essentially, human activities (forest fires, wars, etc.).	This comment is the author's position **against the implementation of the project**, without, however, including arguments regarding the contents of the EIA. Therefore, it cannot be answered in the context of this Memorandum.
55.3	SOFIA	HIM	25/02/2025	Negative	As far as the country is concerned, the question remains as to how the project will contribute to the CO2 emissions balance, as the largest volume of gas to be stored will probably be imported from other countries. As such, the project cannot be considered to contribute to the country's 'green transition', a key pillar of which is . CO2 recycling can be achieved either naturally (by planting trees) or through chemical sequestration (conversion into other molecules/products with high added value). Therefore, CO2 storage is not a developmental process, as it lacks innovation and does not produce a product, while the benefits to the national economy (excessively low annual rent) and the local community (few new jobs, of unknown duration and possibly involving imported technical personnel) are negligible.	For a detailed answer to this question, please refer to **Comment 53.3.**
55.4	SOFIA	HIM	25/02/2025	Negative	At the same time, serious potential risks and environmental impacts are associated with the project, both during construction and operation. According to the EIA, it is estimated that approximately 23 million tonnes of (23MT) of CO2 will be stored in a natural/geological oil reservoir system covering a total area of 256.86 square kilometres. This system occupies most of the central-western Gulf of Kavala and is located a short distance from both the coast of Kavala and Thasos, and therefore from densely populated areas. Given the above, the following question arises: How is the geological behaviour of a liquid hydrocarbon reservoir, such as that of Prinos, affected by the storage within it, under high pressure, of material with completely different physicochemical properties? The EIA itself states (p. 10-83) that "theoretically, CO2 injection into geological formations can increase the pressure within the rock formations, potentially causing seismic events." Of course, the risk is considered to be "... minimal, provided that the operation is carried out in accordance with the planned injection rate and within the framework of safe operation" and always in accordance with the models and simulations of Energean's technical team (sic). It should be noted that the EIA implies uncertainty about the methodology and injection parameters to be used (p. 6-44), a process which, as mentioned above, is critical to the safety of the project. Even if, from a technical point of view, the risk of failure that could lead to a large CO2 leak into the marine environment and the atmosphere is minimised, this could still occur due to natural causes, specifically seismic activity.	For a detailed answer to this question, please refer to **Comment 53.4.**
55.5	SOFIA	HMP	25/02/2025	Negative	In the EIA, the suitability of the area as a CO2 storage site is based on its low seismicity. However, considering the high seismic potential of Greece, the recent intense seismic activity in Athos, the proximity of the area to the Anatolian fault (North Aegean trench), as well as the currently inactive faults crossing the Gulf of Kavala, the possibility of a strong earthquake cannot be ruled out. A strong seismic tremor, even at a distance from the	For a detailed answer to this question, please refer to **Comment 53.5.**

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					reservoir, could cause instability in its structure, which will in any case be subject to high internal pressures from the stored CO2, resulting in uncontrolled leakage. This scenario does not necessarily concern the near future, as the 25 MT of CO2 stored will be inherited by future generations. It is worth noting that, according to the study itself, it will take between 500 and 1,000 years for CO2 to begin to be sequestered through geochemical processes.	
55.6	SOFIA	HIM	25/02/2025	Negative	In addition to the above, significant environmental impacts are expected, both during construction and operation of the project, which will affect marine animal and plant organisms in the area. These relate to waste from the four planned boreholes, as well as disturbance of the seabed from the installation of the pipeline.	For a detailed response to this issue, please refer to **Comment 53.6.**
55.7	SOFIA	HMP	25/02/2025	Negative	The EIA itself mentions possible impacts on fish fauna during the construction of the project. Specifically: "(a) Noise from the works may cause fish to avoid the area. (b) Many fish species use sounds to communicate, especially during reproduction. Increased noise may affect this communication, reducing fertility and reproductive success. (c): Continuous noise may cause stress to fish, affecting their growth, health and behaviour. (d) Reduced visibility: Increased turbidity can make it difficult to find food, as many fish rely on sight to locate their prey. This can affect their growth and survival. (e) Reproduction: Turbidity can affect breeding areas, especially for species that lay their eggs in specific areas of the seabed. Egg deposition may be negatively affected, reducing fertility. (g) Respiration: High turbidity may affect the functioning of the gills ( ), making respiration more difficult and increasing the energy cost of survival.	For a detailed answer to this question, please refer to **Comment 53.7.**
55.8	SOFIA	HMP	25/02/2025	Negative	Furthermore, during the operation of the project and with regard to the treatment of seawater from the pumping wells, the EIA states that "the impacts may be related to: (a) Temperature changes: If the treated water has a different temperature from the sea water, it may create temperature zones that affect the behaviour and distribution of fish. (b) Changes in the ecosystem: The discharge of large quantities of water may affect the structure and functioning of marine ecosystems, affecting the habitats of fish and other marine organisms." It is worth noting here that it is expected that 2,400 tonnes of water per day will be pumped during the first six years of operation, increasing to 2,900 tonnes per day in subsequent years. This is therefore a large amount of water, contaminated with pollutants that were not removed during 'treatment', which will undoubtedly affect marine life in a significant area around the offshore facilities.	For a detailed response to this issue, please refer to **Comment 53.8.**
55.9	SOFIA	HMP	25/02/2025	Negative	Furthermore, the study fails to mention the quantities and identity of the chemicals that will be used to clean the pipes of organisms that adhere to them. Similarly, the quantities of toxic methanol to be used in the injection process are not mentioned.	For a detailed response to this issue, please refer to **Comment 53.9.**
55.10	SOFIA	HPP	25/02/2025	Negative	Regarding the possibility of an accident involving CO2 leakage during the storage process, the study notes that "the corrosive conditions associated with increased CO2 (in water) are likely to have a significant impact on zooplankton calcifying species. Short-term exposure to extreme acidification conditions is sufficient to cause significant damage to shells and deaths in marine gastropods (Bednaršek et al., 2014; Gardner et al., 2018) and commercially important bivalve larvae (Wijsman et al., 2019), resulting in reduced recruitment (Parker et al., 2013)," as well as that "the impacts on coral habitats and rubble bottoms (sic) (tragans) and bivalve reefs may cause long-term damage with possible recovery on a decadal scale." Based on the above, the EIA concludes, rather arbitrarily and essentially contradicting itself, that: "Overall, the negative impact during the operational phase is expected to be localised in the area of the Beta and Delta platforms, and therefore of low significance, as fish will move to areas with less disturbance." Consequently, the study essentially limits the impact of any CO2 leakage on marine organisms (at the local level) to the phenomenon of water acidification, overlooking the fact that CO2 has a very high solubility in water (up to 30%), in contrast to the solubility of oxygen (6.5 mg/L, or 0.00065%). Consequently, in the event of an accident, there will be mass deaths of fish and other organisms from asphyxiation due to high concentrations of CO2 in the water. The argument that "fish will move to areas with less disturbance" assumes that they will survive such an accident. The Thracian Sea, part of which is the Gulf of Kavala, is the main and richest fishing ground in the country, with fishing in the area being an economically important activity at both local and national level. In view of the above and in parallel with the negative impacts of the proposed CO2 storage in Prinos on safety and environmental pollution, the fishing industry is expected to be seriously affected, as will tourism in Thasos and Kavala. In conclusion, the project	For a detailed response to this issue, please refer to **Comment 53.10.**

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					will not contribute to the development prospects of the wider region, but will instead contribute to its further degradation.	
56	Dimitra	Hellenic Ministry of Environment, Energy and Climate Change	25/02/2025	Positive	Where to start with RADAR, which the same people said would result in babies being born with two heads, and now Kavala airport has been completely downgraded... From the FSRU that was lost due to the selfishness of some and went to Alexandroupolis... Your LIES and petty interests will not put an end to this project... The benefits of implementing the investment will be very significant on many levels. In our region, it will ensure that there will be industrial activity for at least the next 20-25 years. With all that this entails in terms of jobs, turnover, professionals working around Prinos, etc. If fertilisers are also included and they give their emissions, we understand how much our environment will be upgraded - something that will bring more visitors and services. Then, new know-how will be developed that will play the role that oil played in the 1980s: studies and jobs for our youth, who will have prospects to remain in our region, which has a serious demographic problem – except, of course, for a certain social class. And, of course, from a geostrategic point of view, we are getting back what we lost when we drove LNG out of Kavala and the radar out of Thasos - the same people were there then too. Article 12 of European Directive 2009/31/EC stipulates that $CO_{(2)}$ must consist of carbon dioxide with a purity of 99.8%. The specifications for the $CO_{(2)}$stream to be transported in bulk via pipelines and cargoes are still under negotiation with the emitters, but are based on experience gained from the development of Pilot Programmes, as well as international standards and guidelines, such as ISO 27913. In addition, as there are projects in Europe that are more advanced than the CO_2 Storage Facility in Prinos, namely the Northern Lights, Porthos and Ravenna projects, the specifications of these projects are also taken into account. Cooperation and exchange of experiences with these initiatives helps to develop best practices for the safe and effective storage of $CO_{(2)}$,while ensuring compliance with strict European standards.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it cannot be answered in the context of this Memorandum.
57.1	Spyros	HIM	25/02/2025	Negative	The Thasos Water SOS citizens' group, which I represent here, after careful research and discussion, has concluded that: - This is not a development project as presented, but a project for the transport and management of industrial waste, which will turn the area into a landfill site for Europe. - It is a project that could cause a large-scale industrial accident because: a. The impermeability of the storage facility is not guaranteed.	For the answer to this specific issue, please refer to **Comment 19.1.**
57.2	Spyros	HMP	25/02/2025	Negative	b. The area is prone to earthquakes, as has been clearly demonstrated in recent days.	For the answer to this specific question, please refer to **Comment 19.2.**
57	Spyros	HIM	25/02/2025	Negative	c. No one can guarantee how the storage site will react to CO_2compression (the argument that it is safe because there was a mining site is refuted).	For the answer to this specific question, please refer to **Comment 19.3.**
57	Spyros	HMP	25/02/2025	Negative	d. Not all safety guarantees for operation and potential accidents are met.	For the answer to this specific issue, please refer to **Comment 19.4.**
57	Spyros	HMP	25/02/2025	Negative	e. Accident at sea: the CO_2leak will make the water more acidic, with unpredictable consequences for the marine environment and, of course, for fishing.	For the answer to this specific question, please refer to **Comment 19.5.**
57	Spyros	HIM	25/02/2025	Negative	f. An accident in the air means that the CO_2cloud can have fatal consequences	For the answer to this question, please refer to **Comment 19.6.**
57	Spyros	HIM	25/02/2025	Negative	g. No one can guarantee that CO_2will be properly separated from the extremely toxic compounds in industrial pollutants and that these will not also be transferred to Prinos.	For the answer to this specific question, please refer to **Comment 19.7.**
57.8	Spyros	HIM	25/02/2025	Negative	Many similar projects have been halted during construction due to unforeseen costs, but since they have already caused damage to the environment/	For the answer to this specific question, please refer to **Comment 19.8.**
57.	Spyros	HIM	25/02/2025	Negative	Furthermore, there is no guarantee that after the transfer of pollutants, the contractors will continue to operate the project. Literally, the island and the opposite area are becoming hostages to unknown forces. A time bomb is being planted in the area. Recent criminal negligence in many of our country's infrastructures makes the project even more uncertain in terms of compliance with the necessary safety conditions.	For the answer to this specific issue, please refer to **Comment 19.9.**
57.10	Spyros	HIM	25/02/2025	Negative	The project is not as environmentally "green" as it is presented. On the contrary: Environmental sciences and the ecological movement consider it unacceptable. The CCS method cannot contribute positively to tackling the climate crisis as it does not address the quantities of CO_2 but indirectly supports the continuation of its emission. (The scientific community recommends the DAC method). It is no coincidence that the largest CCS projects on the planet have failed.	For the answer to this question, please refer to **Comment 19.10.**

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57.11	Spyros	HMP	25/02/2025	Negative	In addition, scientists emphasised that this particular project in Prinos raises suspicions of covert mining.	For the answer to this question, please refer to **Comment 19.11.**
57.1	Spyros	Hellenic Mining	25/02/2025	Negative	The location of such a project in the Gulf of Kavala is unacceptable because: a. It conflicts with the character of the area as a protected area oriented towards tourism development, with irreparable consequences for the economic, cultural and social life of the area.	For the answer to this specific issue, please refer to **Comment 19.12.**
57.13	Spyros	HIM	25/02/2025	Negative	b. It is not provided for or permitted by the General Spatial Plan for the area.	For the answer to this specific question, please refer to **Comment 19.13.**
57.	Spyros	HIM	25/02/2025	Negative	c. The case of Ravenna, which is used as a model in the case of Prinos, has a different size and design, while its platform is 14 miles away from the Italian coast.	For the answer to this specific question, please refer to **Comment 19.14.**
57.15	Spyros	HMP	25/02/2025	Negative	Eirini Furthermore, the community of Thasos unanimously declares through the municipal council that the project is undesirable.	For the answer to this specific question, please refer to **Comment 19.15.**
57.16	Spyros	HIM	25/02/2025	Negative	The argument regarding the "national interest" of the investment cannot be upheld because: a. Under no circumstances can the transformation of a country into a landfill site be considered to be in the national interest.	For the answer to this specific question, please refer to **Comment 19.16.**
58	DIMITRIS	HIM	25/02/2025	Negative	The proposed CCS project in Prinos offers no environmental benefits, but rather has negative impacts. Instead of removing $CO_2$from the atmosphere, it will add more. It is clearly harmful to the environment and the economy and constitutes an attempt at "greenwashing" that has no real environmental impact.	For the benefits of implementing the project, please refer to **Section '4.1.3 Expected Benefits at Local, Regional and National Level'** of the EIA. For the economic and social footprint of Energean's activities and the proposed project, please refer to **Comment 32.2**. For the response to the allegation of 'greenwashing', please refer to **Comment 32.35**.
58.2	DIMITRIS	HIM	25/02/2025	Negative	It should be rejected in its entirety for the following reasons: 1) Ineffective CO_2reduction: The CCS project does not remove $CO_2$from the atmosphere (as the DAC-Direct Carbon Capture method does) but provides an alibi for companies that burn fossil fuels, allowing them to continue emitting CO_2 instead of switching directly to renewable energy sources. The global effort to tackle climate change requires the immediate and complete replacement of fossil fuels.	For the issue of the importance of CCS projects in national climate planning and in the corresponding EU policies, as well as the issue of the DAC method, see **Comment 19.10.** For a detailed response to the specific issue of the "immediate and complete replacement of fossil fuels", see **Comment 53.1**.
58.3	DIMITRIS	HIM	25/02/2025	Negative	2) Enhanced oil recovery: The use of CO_2 for Enhanced Oil Recovery (EOR) in saturated and inactive reservoirs leads to the restart of oil extraction. This is contrary to the project's objectives, as the $CO_{(2)}$ that is supposed to be stored will in fact be used to enhance continued oil production, increasing emissions and exacerbating the greenhouse effect.	The project under consideration is in no way related to hydrocarbon extraction, as clearly described in the EIA, which clearly states that the project under evaluation aims exclusively at $CO_{(2)}$ storage and is not related in any way to hydrocarbon extraction. In the CO_2 injection project in Prinos, there are no plans for simultaneous CO_2 injection/storage and hydrocarbon extraction in the same geological horizon. The only period with possible simultaneous hydrocarbon production and $CO_{(2)}$injection/storage concerns **different deposits** and refers to the first stage of the project, where CO_2 will be injected and stored in reservoirs B and C, and oil production will take place from reservoir A. The fact that reservoir A continues to produce for some time while CO_2 is injected into B and C does not create any interaction between the two activities, as there is no communication between the different reservoirs. Therefore, **CO_2 injection always takes place in areas where oil production has ceased.**
58.4	DIMITRIS	HPM	25/02/2025	Negative	3) Failure of CO_2storage: Data from similar projects worldwide show that CO_2storage success rates do not exceed 50%. In fact, 70% of the largest and most publicised projects have failed, leaving behind environmental and economic damage.	The statistics cited in this comment do not correspond to reality and are not included in any of the available reliable sources in the literature. For more detailed information on the subject of this comment, please refer to **Comments 32.11** and **32.38** of this Memorandum.
58.5	DIMITRIS	HIM	25/02/2025	Negative	4) Money wasted: Subsidies and investments by companies will end up being wasted, while delaying the necessary energy transition. Ultimately, companies will be called upon to reinvest in renewable sources once the project is completed, without having offered a meaningful solution to reducing emissions.	This part of the comment is the author's position **against the implementation of the project**, but does not include arguments related to the contents of the EIA. Therefore, it cannot be answered in the context of this Memorandum.
58.6	DIMITRIS	HIM	25/02/2025	Negative	5) Inefficient choice compared to RES: Investments in Renewable Energy Sources (RES), especially in photovoltaics and batteries, are currently the most economical solution. In contrast, continuing hydrocarbon extraction is already more expensive, and $CO_{(2)}$storage will make it even more expensive. The project will require ongoing subsidies to cover its costs, without providing a long-term solution or real improvement. For all the above reasons, we call on the State to reject the CO_2 storage project in Prinos and focus on supporting polluting industries to invest in renewable energy sources. Only in this way can sustainable solutions for the future be ensured. Dimitris Fanariotis, as a citizen and	This part of the comment is the author's position **against the implementation of the project**, without, however, including arguments regarding the contents of the EIA. Therefore, it cannot be answered in the context of this Memorandum.

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					representative of the EcoCorfu Environmental Initiative, the Bio7nissa Biolonio Social Cooperative and the Eco7nissa Ecolonio Environmental Initiative.	
59	Chrysoula	HPM	25/02/2025	Negative	**FILE:** Prinos_my_Bericht_2025_01_28 (1).pdf	For answers to these questions, please refer to **Comments 32.1** to **32.48.**
60	DIMITRIS	HIM	25/02/2025	Negative	One correction: DAC = Direct Air Capture (not Direct Carbon Capture). DAC methods absorb CO_2 from the atmosphere rather than from chimneys, and store it in minerals, in the sea in biochar and in the soil as a fortifier, which are natural methods that ensure its reuse by nature and do not have the risk of leakage that CCS has. They also bring economic benefits, such as biochar being turned into fertiliser. These methods are ecologically acceptable, whereas CCS is not. Examples here: https://www.xprize.org/articles/from-air-to-action-how-direct-air-capture-fights-climate-change and: https://www.scientificamerican.com/article/scrubbing-carbon-from-the-sky/ With DAC, we reduce net carbon from the atmosphere and convert it into something useful, unlike the use of $CO_{(2)}$ for EOR, which involves additional oil extraction, as proposed in Prinos with CCS.	The comparison of DAC and CCS methods is not the subject of the EIA under evaluation. Therefore, the author's position on the DAC method, without however including arguments related to the contents of the EIA, cannot be answered in the context of this Memorandum. It should be noted, however, that the contractor has officially announced that its design includes the pilot application of the DAC method at the Nea Karvali onshore facilities. The project under consideration is in no way related to hydrocarbon extraction, as clearly described in the EIA, which clearly states that the project under evaluation is aimed exclusively at $CO_{(2)}$storage and is not related in any way to hydrocarbon extraction. In the co_2 injection project in Prinos, there are no plans for simultaneous co_2 injection/storage and hydrocarbon extraction in the same geological horizon. The only period with possible simultaneous hydrocarbon production and $CO_{(2)}$injection/storage concerns **different deposits** and refers to the first stage of the project, where CO_2 will be injected and stored in reservoirs B and C, and oil production will take place from reservoir A. The fact that reservoir A continues to produce for some time while CO_2 is injected into B and C does not create any interaction between the two activities, as there is no communication between the different reservoirs. Therefore, **CO_2 injection always takes place in areas where oil production has ceased.**
61	Themistoklis	HPM	26/02/2025	Negative	I cannot understand the reasons for carrying out the project in an area that is environmentally burdened (fertiliser factory, oil factory).It will store 1 million tonnes of CO_2(with a target of 3 million) when the corresponding project in Egypt will store 580 million. So what will be the environmental benefit of creating this plant in a tourist area? The only benefit I see is for Energean and its neighbours! And we don't want compensatory benefits! We don't want the project to go ahead! And I thought that in the consultation on something that has already been decided, there would only be opposing voices calling for the decision to be changed! I did not expect to see so many fanatics defending the government's decision with "so much knowledge"! And of course, I am not the expert to judge them. Well done to those who got involved and informed us so that we know what is going on!	This comment is the author's position **against the implementation of the project**. Therefore, it does not need to be answered in the context of this Memorandum.
62	Panteleimon	HIM	26/02/2025	Positive	As a citizen and academic with long-standing expertise and experience in environmental issues, I express my full support for the development of the CO_2 Storage Unit in Prinos. This project is a flagship initiative for reducing carbon emissions in Greece and can place our country at the forefront of the energy transition in the Eastern Mediterranean. Geological CO_2 storage is a cutting-edge technology that has already been adopted by countries such as Norway, Denmark and the Netherlands, strengthening the decarbonisation strategies of industry. The use of Prinos as a CO_2 storage site offers an immediately available, safe and proven solution, significantly reducing the carbon footprint of Greek and regional industries. The project will have a substantial positive impact both nationally and on the local community of Kavala. Specifically: -Emissions reduction and compliance with climate targets: Greece is committed to climate neutrality by 2050, and CO_2 storage is one of the key tools for achieving this goal. Prinos can play a decisive role in this effort. -Preserving and creating jobs: The project allows existing jobs in the energy sector to be preserved, while creating new, highly skilled jobs in the CO_2 storage sector. -Boosting the local economy: Investment in the CO_2 Storage Facility will attract new capital, boost local entrepreneurship and create new growth opportunities in the region. -International recognition and attracting investment: With the successful implementation of the project, Greece can become a regional centre of innovation and research in the field of CO_2 storage, attracting European and international capital. Why the project is necessary and safe: Based on the content of the Environmental and Social Impact Assessment, the project has been designed according to the highest international standards of safety and environmental protection. Experience from other European countries shows that geological CO_2 storage is a safe and reliable solution when implemented with strict monitoring and advanced technology. The use of existing infrastructure in Prinos offers an advantage, as the area has already been geologically studied, minimising any uncertainties. The CO_2 Storage Facility in Prinos is not just another energy project. It is a strategic investment in Greece's future, enhancing sustainability, innovation and our country's position on the global climate technology map . For these reasons, I unreservedly support its immediate promotion and implementation.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.

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63.1	Theodota NANTSOU	HIM	26/02/2025	Negative	Joint comments by WWF Greece and Greenpeace Greece on the EIA concerning the CO_2 in Prinos The use of carbon capture and storage technologies is not simply a matter of hugely expensive facilities that have limited application to date and unproven effectiveness, but also pose serious environmental risks and cannot be a large-scale solution for the climate. International experience to date with large-scale carbon dioxide ($CO_{(2)}$)capture and storage projects has been marked by repeated failures in terms of the operation, cost and practical effectiveness of such projects. Only two large-scale projects – comparable to the one proposed for Prinos – have been carried out in Europe, which have been advertised as successful (both in Norway), without reality confirming these claims. The experience on other continents is similar. Characteristics: • At Sleipner (Norway), located in the southern part of the North Sea, the CO_2 was transported to a layer below the seabed, which the geological simulation models used for the study could not have predicted. As a result, millions of tonnes of $CO_{(2)}$ (no one can estimate how many) are now moving in various directions under the seabed. •In the Snøhvit project (Norway) in the Barents Sea, the first attempt to discharge $_{CO_2}$was cancelled due to the rapid increase in pressure to critical levels. Only the third attempt seems to have been successful (so far). •In a similar case in In Salah, Algeria, the project failed completely, as its managers ignored the unexpected increase in pressure in the $_{CO_2}$ storage site for a long time. The result was that the project was suddenly halted to avoid the worst, as the ground above the storage site had risen by several centimetres. •In the Gorgon project in Australia, years of effort (at least eight years) had not resulted in significant $_{CO_2}$ storage, as water entering the storage site prevented storage. Chevron, the company operating the project, will have to use part of the infrastructure to stabilise the facility if the project is to operate. All these examples demonstrate the uncertainty, experimental nature and economic risk of such projects. Both for the very demanding design phase and for the technical problems that are likely to arise, companies carrying out $_{CO_2}$ storage projects need government subsidies (as is already the case for Energean's project in Prinos).	For the answer to the question of the cost of CCS projects, see **Comment 32.4**. The injection of carbon dioxide into hydrocarbon deposits is not a recent methodology. It has been in use since the 1970s, mainly in the United States and Canada, where it is applied to increase oil production (EOR method). In this methodology, a small percentage (approximately 30%) of the injected carbon dioxide is trapped and remains in the reservoir, while the rest is extracted with the oil and recycled. The behaviour of carbon dioxide and its interaction with the reservoir fluids is similar to what happens in a CCS project in depleted hydrocarbon reservoirs. The difference lies in the fact that in such a CCS project, water is produced instead of oil, thus creating space for CO2 storage and preventing pressure build-up. According to the latest data from the Global CCS Institute, there are 50 $_{CO2}$ storage projects in operation worldwide, with a further 630 in development. Similarly, more than 40 projects with a capacity of 140 million tonnes per year are under development in Europe, with the aim of becoming operational by 2030 (19 projects in EU countries, with a capacity of 42 million tonnes per year by 2030). Therefore, the part of the comment that states *"International experience to date with large-scale carbon dioxide ($CO_{(2)}$)capture and storage projects has been marked by repeated failures in terms of operation, cost and practical effectiveness."* It is clear that CCS projects alone cannot be a large-scale solution to climate change. There is no single solution. There are many, none of which excludes the other; all must move forward in parallel, and each contributes in its own way to mitigating the phenomenon. One of these is CCS. For the issue of the importance of CCS projects in national climate planning and in the corresponding EU policies, see **Comment 19.10**, and for the role of CCS projects in achieving climate change targets, see **Comment 38.**19 For the Sleipner and Snøhvit projects, see **Comment 32.11**. The In Salah project in Algeria encountered some technical issues, but it should be noted that the geological formation had petrophysical characteristics that were unsuitable for CCS eligibility from the outset (very low reservoir connectivity, resulting in carbon dioxide accumulating in specific sub-areas within the reservoir and preventing the smooth diffusion of $CO_{(2)}$, thus increasing pressure). Alternative injection points/locations are being investigated. The main reason behind Gorgon's lower-than-expected performance is the management of reservoir pressure, which had to remain within a specific range. As a result, the pressure of the $_{CO_2}$ injection system had to be limited (reduction in injection rate), resulting in smaller quantities of carbon dioxide being received. To restore performance, more water production wells are being constructed from the reservoir to achieve better pressure management by pumping a larger volume of water. Such technical operational issues, which may have arisen in some CCS projects, as in any large and complex project, should not raise concerns about their overall effectiveness. It is not possible for them to operate completely smoothly, but the issues are manageable and do not constitute failures. Financial support for CCS projects is necessary during the design and installation phase, not when technical problems arise.
63.2	Theodota NANTSOU	EPM	26/02/2025	Negative	In general, with regard to CCS facilities, we support the following: 1. Rapid and deep reductions in greenhouse gas emissions must be the first and foremost priority for mitigating climate change. This must be achieved primarily through absolute reductions in emissions, with priority given to supporting the transition and eliminating dependence on fossil fuels in favour of 100% renewable energy sources, through proper spatial planning with strong safeguards for the protection of ecosystems and meaningful social participation and control of the energy system.	This comment is the opinion of the author and does not refer to the content or scope of the EIA. Therefore, it does not need to be addressed in this Memorandum.
63.3	Theodota NANTSOU	EPM	26/02/2025	Negative	2. Relying on CCS to achieve global emission targets within the required timeframe is highly risky due to the unproven and theoretical nature of the technologies, despite decades of investment. Pilot CCS installations currently capture less than 0.1% of global emissions, and even if all announced projects come online, only 0.6% of global emissions are projected to be captured by 2030. These are therefore very high-cost facilities whose climate effectiveness has not been proven, and there are concerns that their construction will be subsidised by substantial public funds which, in our opinion, would be much more beneficial economically and socially if they were directed towards strengthening social participation and tackling energy poverty.	As mentioned above, it is clear that CCS projects alone cannot be a large-scale solution to climate change. However, there is no single solution. There are many, and none of them excludes the others; they must all work in parallel, each contributing in its own way to mitigating the phenomenon. One of these is CCS. For the issue of the importance of CCS projects in national climate planning and in the corresponding EU policies, see **Comment 19.10**, and for the role of CCS projects in achieving climate change targets, see **Comment 38.**19 CCS projects certainly do not, on their own, address the achievement of global emission targets within the required timeframe, but the proposed project will give Greek industries with GHG emissions the opportunity to make the necessary adjustments in a less 'violent' way and become climate neutral and economically viable at the same time. In this way, the climate transition will be achieved in a socially milder way that will not lead to adverse social impacts if it achieves the necessary goal of climate neutrality.
63.4	Theodota NANTSOU	EPM	26/02/2025	Negative	3. CCS could be a temporary last-resort solution for reducing emissions from industrial processes that are difficult to address, while cost-effective large-scale alternatives are being sought. The EIA for the Prinos project offers no such assurance and no guarantee	This is the role of the proposed project, i.e. to be *"a temporary solution of last resort to reduce emissions from industrial processes that are difficult to address, while cost-effective large-scale alternatives are being sought*",

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					that the facility will not ultimately bury emissions from the oil industry itself, as various sectors (such as Kavala fertilisers) are mentioned as examples.	as included in both the EIA and the relevant national climate planning and corresponding EU policies (see **Comment 19.10).** It is not the purpose of the EIA to include assurances or prohibitions on the storage of emissions from the oil industry in the project under consideration, as this is not within its remit and cannot be formulated as it probably has no legal basis. However, within the scope of its role, the EIA has formulated proposed possible sources of $CO_{(2)}$emissions (indicatively, the fertilisers of Kavala), which do not include $CO_{(2)}$emissions from the oil industry.
63.5	Theodota NANTSOU	EPM	26/02/2025	Negative	4. Each CCS project must always be assessed with specific data (and not vague statements) regarding its role as a "climate solution". To date, CCS projects have consistently fallen short of their ability to meet proposed commitment rates, while there are reasonable concerns that they are being designed as a continuation of the oil industry.	The consistent underperformance of CCS projects "in relation to their ability to meet the proposed commitment rates" and the concern that they are being designed as a continuation of the oil industry's operations does not arise from anywhere, and for this reason CCS projects occupy a prominent position and role in relevant national climate planning and in the corresponding EU policies (see **Comment 19.10).** Their important role is also confirmed by the rapidly growing interest in their implementation. As has been repeatedly mentioned, according to the most recent data from the Global CCS Institute, there are 50 $CO_{(2)}$storage projects in operation worldwide,with a further 630 in development. Similarly, in Europe, more than 40 projects with a capacity of 140 million tonnes per year are under development with the aim of becoming operational by 2030 (19 projects in EU countries, with a capacity of 42 million tonnes per year by 2030). Therefore, the part of the comment that states *"To date, CCS projects have consistently fallen short of their ability to meet the proposed capture rates, and there is reasonable concern that they are being designed as a continuation of the oil industry."*
63.6	Theodota NANTSOU	Hellenic Petroleum	26/02/2025	Negative	5. The injection of carbon dioxide into the subsoil of land or sea for permanent storage is complex and may involve significant ongoing environmental and climate risks. In the event of leaks or uncontrolled subsea formations, if these are altered due to the deposition of huge quantities of $CO_{(2)}$,the risks of leaks to the marine environment of Thasos and the wider region would be significant. Leaks of either co_2or saline water from the subsea formations would cause acidification of marine waters with significant negative impacts on local biodiversity. In addition, increased seismicity is a significant environmental risk, which has been observed in many cases in the United States (a regular phenomenon in cases where water is injected into mining deposits using the fracking method), as well as in Norway, where many earthquakes have occurred in deposit sites used for $CO_{(2)}$storage [1].	For a detailed presentation of the risks associated with the Project facilities and the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters, please refer to **Section '10.4 IMPACTS RESULTING FROM THE PROJECT'S VULNERABILITY TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** in the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. For the possibility of CO_2leakage with possible acidification of seawater, see **Comment 19.5.** Through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2 in the Prinos reservoir", the historical development of the reservoir pressure is presented in detail. These studies also calculate the future change in pressure due to the injected quantities of carbon dioxide, as well as the safe limit above which cracks may open. Consequently, the behaviour of the reservoir in response to pressure changes that could lead to induced microseismicity has been thoroughly studied and the safe limit has been taken into account in the project design. Finally, it is unclear why the comment refers to the use of the "hydraulic fracturing" (fracking) method. The EIA, based on legal requirements, describes and evaluates only the proposed project, together with the planned implementation methodologies. The fact that the EIA does not refer to the "hydraulic fracturing" (fracking) method is because **this method is not included in the design of the proposed project** and will not be included in the Environmental Permit for the project. It should be noted that although there is no intention whatsoever on the part of the project operator to use the "hydraulic fracturing" method, its "prohibition" cannot be the subject of the EIA, as it is not part of the project procedures and therefore does not need to be analysed in the EIA. The purpose of the EIA is not to prohibit any method not provided for in the project, as this is implied by the environmental licensing procedure, under which only the project described in the EIA is licensed.
63.7	Theodota NANTSOU	EPM	26/02/2025	Negative	6. The permanence and safety of storage must be linked to strict safeguards, strategic environmental impact assessments (EIA) and continuous independent regular monitoring to ensure that there are no leaks (which is an extremely serious and real risk, based on international experience and scientific research). This creates long-term obligations that are no different from those associated with nuclear waste storage and must be taken into account in any business study and project evaluation process.	The comment that the implementation of the project requires the preparation of **a Strategic Environmental Impact Assessment** is not accurate. The Strategic Environmental Assessment (SEA) process, as set out in Article 7 of Joint Ministerial Decision YPEXODE/EYPE/oik. 107017/2006, as currently in force, includes the preparation of a Strategic Environmental Impact Study (SEIS) to assess the potential significant effects of Plans and Programmes on the environment and to propose appropriate measures/ guidelines for preventing and addressing these impacts, which are incorporated into the environmental approval of each Programme following public consultation on the SEA with the relevant public bodies and the public. It is clear that, under current legislation, the proposed project is not subject to the requirement to prepare a Strategic Environmental Impact Assessment. With regard to "strict safeguards" it should be noted that the project is subject to continuous and thorough checks by both the competent national authorities and the relevant Community services, which check, certify and ultimately approve all the parameters for the implementation and operation of the project. In accordance with EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a system of corrective measures are an integral part of the CO_2 at the Prinos storage site and their prior approval by EDEYEP and the competent EU climate directorate is a prerequisite for the completion of the licensing process, which is fully covered by a study conducted by an international firm with experience in the relevant field. In accordance with EU and national law, the monitoring programme is fully implemented both during all years of operation of the storage site and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take into account changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology.

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						The operating conditions of the project are clearly defined by the existing national and EU legal framework, as are the obligations of the project operator after the end of the CO_2 storage process.Upon completion of a CCS project, the **operator** is responsible for monitoring, taking preventive and corrective measures, and sealing the storage site. The transfer of responsibility to the competent authority is only possible under specific conditions that ensure that the stored carbon dioxide remains completely and permanently isolated (see EU Directive 2009/31/EC, Articles 18, 19 and 20). The entire project (not just the drilling) is monitored during operation, at closure and after closure. There are clear European laws, regulations, and obligations (see EU Directive 2009/31/EC on the underground storage of CO_2). A strict measurement-monitoring-verification (MMV) plan is implemented from the start of operation until closure and beyond. Under current EU and national legislation, the risk, i.e. the liability, of an 'accident' is borne both during the operation of the facility (i.e. for up to 25 years initially, years, but also for any extension, if the storage capacity allows it) and for an additional period of 20 years after the closure of the facility. After 20 years have elapsed since closure and provided that all available data indicate that the stored CO_2 will be kept completely and permanently isolated (Article 18 of the relevant Directive 2009/31 of the European Parliament and Article 19 of the existing national legislation), the storage facility shall be handed over to **the competent authority (Greek State)**.
63.8	Theodota NANTSOU	HIM	26/02/2025	Negative	7. CCS projects must thoroughly examine the energy requirements associated with each stage of their value chain (capture, compression, transport, storage). CCS is an energy-intensive process over the lifetime of the facility and may negate the estimated benefits of the purported greenhouse gas absorption. The increased energy requirements of capture, and the resulting environmental consequences (e.g., increased air pollutant emissions) are not addressed in the EIA.	The comment author's assertion is not accurate. The energy consumption of the proposed project (compression, transport, CO_2 storage) and the related GHG emissions have been calculated in detail in **Section '4.5 CARBON FOOTPRINT OF THE PROJECT'** of the EIA. The corresponding calculations show that the relevant emissions are **negative** and are considered **constant** and equal to **869,175 tn $CO_{2\ eq}$ per year**. It should be noted that CO_2 sequestration activities have not been examined in terms of energy consumption and CO_2 emissions. This is because, on the one hand, they will have negligible energy consumption and GHG emissions (from the capture, compression, transport, storage, and on the other hand because they are the responsibility of the project's CO_2 suppliers (they will be examined in the context of their own environmental licensing) and are not part of the proposed project and the EIA under consideration.
63.9	Theodota NANTSOU	EPM	26/02/2025	Negative	8. The assessment of CCS projects must consider the broader environmental and social risks associated with every aspect of the value chain. These include, among others, $CO_{(2)}$leakage risks,air pollutants, governance risks, impacts on biodiversity, impacts on water, and geological and seismic risks. According to scientific literature, the overall environmental risks of implementing CCS projects outweigh the benefits of sequestration (Singh et al. 2010, Cuéllar-Franca 2015, Saur Modahl et al. 2012). These overall risks can only be assessed in the context of a life cycle analysis, which is absent not only from the EIA file, but also from the overall project licensing file to date.	All of the risks mentioned by the author of the comment are examined in the relevant sections of the EIA under review *("CO_2 , air pollutants, governance risks, impacts on biodiversity, impacts on water, and geological and seismic risks).* Both the conclusions of the project's EIA and the assessment of CCS projects in the relevant national climate planning and corresponding EU policies (see **Comment 19.10)** contradict the comment's assertion and document the exceptional P&K benefits of implementing $CO_{(2)}$capture projects (including the proposed one). This EIA has been prepared in accordance with the requirements and specifications of national and EU legislation, and its contents have been structured in accordance with their provisions. The complete project licensing file to date is not the subject of the EIA. However, it should be noted that it is also subject to review and approval by the competent national and EU services and authorities, which will certify its completeness or request additional information.
63.10	Theodota NANTSOU	EPM	26/02/2025	Negative	9. Following on from the above points, the EIA fails to identify any synergistic effects with other projects: indeed, it emphatically states that such "interactions" "do not exist" (e.g., EIA, pp. 139, 254)These claims are refuted by the EIA itself. Apart from oil extraction (which, for a certain period of time, will coexist with storage, see EIA p. 415), increased ship traffic, adjacent natural gas storage (YAHA project) and the continued operation of the Sigma facilities are projects with obvious synergistic effects. Fishing and extensive aquaculture in the area are mentioned, but it is considered, quite arbitrarily, that they will escape the impacts on the marine environment.	The fact that other projects may be operating in the study area, some of which may interact (to any degree) with the proposed project, does not automatically imply that there will be adverse cumulative and synergistic effects. The EIA for the project includes **'Section 10.6 ASSESSMENT OF CUMULATIVE/SYNERGISTIC IMPACTS'**, which identifies and assesses the cumulative and synergistic impacts of the proposed project at the following three levels: • **1ο Level**. Interaction with future infrastructure and activities to be developed at a later stage of the overall Project, part of which is the Project examined in the EIA. • **2ο Level**. Interaction with other projects and activities existing in the immediate or wider area of the Project. • **3ο Level**. Interaction with projects of the same nature and similar size that are being implemented or planned at national level. In addition, the interaction of the proposed project with other projects has been thoroughly examined in the context of assessing the potential impacts of the proposed project on each Environmental Parameter as part of the environmental impact assessment process based on the normal/normal operation of the project, as the Synergy (SI) parameter of the impact has been incorporated into the equation for calculating the quantified value of the significance of each potential impact (for details, refer to **Section '10.1.2.2.1** Calculation of the Significance of Impacts'). In conclusion, based on the documentation provided in the sections assessing the potential impacts on each Environmental Parameter and in **Section 10.6** of the EIA, it appears that no significant adverse synergistic impacts are expected within the framework of the proposed project.
63.11	Theodota NANTSOU	EPM	26/02/2025	Negative	10. Following on from the above points, the examination of the project's impact on the marine environment, and indeed within a Natura area (with protected species, including fish), is clearly inadequate. Specifically, it is assumed that the process water will undergo	The potential adverse impacts on marine and terrestrial animal and plant organisms in the area, on habitats and on institutionally protected areas of ecological interest are examined in detail in **Section '10.2.4 Impacts on the Natural Biotic Environment"** of the EIA, as well as in the **MEIA** included in Annex 17.1 of the EIA.

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					the same treatment before being discharged (e.g. EIA, p. 967). In fact, the EIA considers it particularly "reassuring" that "Natural Occurring Radioactive Material (NORM)" will be the same as that currently discharged (and indeed within a protected area) (EIA, p. 216). However, regardless of the fact that these impacts should be reassessed from scratch, there is no indication that the increase in volume and the extension of the duration of the discharges will not cause further impacts and exceed the carrying capacity of the marine environment.	More specifically, as the project is located within institutionally protected areas of ecological interest (Natura network areas), a "Special Ecological Assessment Study of the CO_2Storage Unit in Prinos in SPA & SAC GR1150014, SPA GR1150001, SAC GR1150010 and SPA GR1150012 of the Natura 2000 Network" has been drawn up, which forms an integral and inseparable part of the EIA. The SEA analysis took into account all available bibliographic data for the Natura network areas in question, the long-term environmental monitoring data applied by ENERGEAN in the area, and extensive seasonal fieldwork has been carried out by a large multidisciplinary team, as described in the SEA itself. The conclusions of this study indicate that no significant impact is expected on the natural habitat of the study area, and even less so on the protected areas, their species classification and their ecological characteristics. However, it should be noted that in order to support his position, the author of the comment has used an excerpt from the EIA in a way that leads to a misleading conclusion. More specifically, on page 967 of the EIA, the text referred to in the comment reads as follows*: "The water production wells on the Beta platform will be equipped with electric pumps, which will extract water from the reservoir. It is expected that the water produced from the storage project will undergo the same treatment as that of the current operation through oil separators on the Delta platform. The appropriately treated water will be discharged into the sea. However, the treatment required will be further investigated after water samples from the aquifer at the storage complex have been taken and analysed."* The addition of the above underlined section completely changes the meaning claimed by the author of the comment, namely that "*it is assumed that the process water will undergo the same treatment before being discharged*". The EIA considers it particularly "*reassuring*" that "*Naturally Occurring Radioactive Material (NORM)*" will be the same as that currently discharged, as the negligible amount of this material (and, by extension, the radiation levels emitted) will continue to exist at levels that cannot cause any significant environmental impact.
63.12	Theodota NANTSOU	EPM	26/02/2025	Negative	11. The EIA assures that "according to the data collected over a number of years" by the project promoter, these are "tectonically stable areas" (EIA, p. 243). Regardless of the artificial seismicity that similar projects sometimes cause (see relevant comment), this is an extremely superficial approach to the seismic risks in the area, which should have been assessed on the basis of all the data for the wider region of Thrace. Similar assessments must be based on sufficient data on seismicity (cf. Annex I to Directive 2009/31), and cannot be made solely on the basis of data collected (according to unknown specifications) by each interested party. The EIA ignores widely available data (such as the Seismotectonic Atlas of Greece, which is widely used in Geological Suitability Studies), the existence of active faults at a relatively close distance (e.g., the Kavala-Xanthi fault), and the possibility of impacts on the project from a potential earthquake with an epicentre outside the immediate vicinity (e.g., the nearby "North Anatolian Fault").	The seismicity of the area under study has been thoroughly examined in the study entitled ***"Seismotectonic Investigation of the Kavala Area - Geometry and Kinematics of Active Structures based on Seismological, Geological and Geodetic Data"*** conducted by the **Geodynamic Institute of the National Observatory of Athens**. In summary, according to the above study, the historical and instrumental seismicity of the Prinos basin and the surrounding areas (Orfanou basin, Thasos, wider Kavala area) and performed a geometric, dynamic and kinematic analysis of the active marginal fault zones of the basin, as well as calculating the expected seismic magnitudes. According to the conclusions of the study, the Prinos basin, in relation to the surrounding areas (Northern Aegean, Chalkidiki, etc.), is characterised by **reduced seismicity.**
63.13	Theodota NANTSOU	EPM	26/02/2025	Negative	12. The risk assessment included in the EIA does not meet the requirements of the legislation (Chapter 10.4.2.). First of all, such an investigation must be based on "sufficient data" (Annex I, Phase 1, Directive 2009/31): on the contrary, the EIA admits to extensive data gaps, even on issues that fall within the responsibility of the operator concerned, which should have been resolved at the exploitation stage (e.g. "the quantification of leaks in boreholes is of limited accuracy due to the large number of variables per borehole (input data in simulation models) and the lack of data on the failure probabilities of borehole equipment...", p. 1147). For example, this investigation should include "the potential magnitude of leakage events for identical leakage pathways (flow rates)" and the "critical parameters] affecting potential leakage (e.g., maximum reservoir pressure, maximum injection rate, temperature, sensitivity to various assumptions in the static geological models of the earth, etc.)": here, there is no information on the magnitude of leakage events, while the only parameters mentioned (very briefly) are reservoir pressure and temperature (see 10.4.1.2). The use of best practices for this assessment is not confirmed (ISO 27914:2017, DNV-RP-J203, see also EC, Guidance document 1: $CO_{(2)}$storage life cycle and risk management framework, p. 23 ff.). Above all, the necessary transparency is not ensured, since the need for additional measures is confirmed, but their content is not specified at this stage (e.g., "the twelve wells will require additional monitoring or remediation in order to reduce the risk to an ALARP (As-Low-As-Reasonable-Practicable) level. The details of the control measures will be finalised during the final design phase...", p. 1142).	The project design has been implemented through a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) as part of the "Application for CO_2Storage in the Prinos Reservoir." The EIA includes the conclusions of these studies, which are considered useful by the researchers for the implementation of the EIA process, as, on the one hand, there is no requirement for them to be included as such in the project's EIA (nor would it be useful), and on the other hand, due to their highly technical nature, these studies are duly approved by specialised scientific personnel of the competent licensing and supervisory authorities and are not subject to public consultation. However, it should be noted that these studies have been submitted, reviewed and approved by specialised scientific staff of the competent licensing and supervisory authorities. Consequently, the Environmental Impact Assessment (EIA) study has thoroughly identified all potential risks associated with $CO_{(2)}$leakage from the field, including those associated with fractures, old and new wells. This risk assessment was carried out in accordance with regulatory requirements and is supported by sufficient data to ensure that these risks are fully recognised. For a detailed presentation of the risks related to the Project facilities and the potential impacts arising from the vulnerability of the Project under study to major accident or disaster risks, please refer to **Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'** of the EIA, which examines and assesses the potential impacts on all stages of the project's life cycle and on all of its infrastructure. In addition, the EIA describes the relevant mitigation actions for each identified risk, ensuring that appropriate measures are in place to prevent any environmental impacts. Quantifying a potential leak from old wells is part of the next step in the ongoing and iterative risk assessment process. By incorporating additional data analysis and predictive modelling, this iterative risk assessment process enhances the project's ability to effectively monitor and mitigate any potential leakage, strengthening the long-term integrity and safety of the CO_2 storage project.

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63.14	Theodota NANTSOU	EPM	26/02/2025	Negative	13. In light of the above comments, we note that the procedure followed violates, in our opinion, EU law on at least one point. Specifically, and as recently provided for, *"facilities used by the operator for the purpose of exploring for and exploiting hydrocarbons under an exploration and exploitation licence may be used for CO_2 , without, however, being subject to the obligations imposed after the closure of a storage site for pure CO_2 , as provided for in paragraph 2 of Article 18 of Joint Decision No. 48416/2037/E.103/2011..."*. This constitutes a favour to the specific operator, which is contrary to EU law, which does not provide for such a distinction (i.e. between existing installations and installations constructed specifically for storage, cf. Article 17(2) of Directive 2009/31).	The only obligation to which this provision relates is the removal of existing facilities that already serve the activity of hydrocarbon exploitation (and are therefore governed by this specific legislative regime), and this only if any part of them (e.g. an existing platform) allows their use for $CO_{(2)}$storage purposes.**The provision does not apply to injection facilities (e.g. boreholes) that will be created exclusively for the purpose of $CO_{(2)}$storage.**
63.15	Theodota NANTSOU	HMP	26/02/2025	Negative	14. In our opinion, public subsidies should not be directed towards any projects in the oil industry, but exclusively towards innovative mitigation technologies, energy and material efficiency, and other solutions to climate change, such as the restoration of ecosystems that can serve as natural infrastructure for climate adaptation and mitigation. As we have already pointed out, "based on the internationally accepted definition (see Annex), fossil fuel subsidies in our country are indicatively as follows: o The provision of a subsidy for the construction of the Alexandroupolis CCS facility, amounting (to date) to €272.7 million. o The recent approval by law (Law 5115/2024, Article 7A, paragraph 1) of the State's assumption of the maintenance costs of the "South Kavala" Underground Natural Gas Storage Facility. Finally, energy scenarios that rely heavily on carbon capture and storage (CCS) are not consistent with the real task of limiting the temperature increase to 1.5°C. The commercialisation of CCS as a climate mitigation technology ( ) has remained slow over the last two decades, particularly without an effective carbon price, and has not demonstrated widespread success. ----------Footnote: [1] CCS – A wrong track - Why carbon dioxide disposal sites block climate protection, Greenpeace Germany, 2024.	This comment is the author's position **against the implementation of the project**, without reference to the content or scope of the EIA. Therefore, it does not need to be addressed in this Memorandum.
64	Giorgos	HPP	28/02/2025	Positive / Unclear	The provisions of the EIA regarding the conduct, safety and monitoring of drilling are impressive – not to mention the fact that the operating company has already carried out 20 drillings in the Gulf of Kavala, unless I am mistaken. The construction of $CO_{(2)}$injection wells will be approached by drilling completely new wells from scratch, specially designed with materials that are resistant to the corrosive properties of $CO_{(2)}$. This ensures that the integrity of the well is maintained throughout its lifetime, protecting against potential leaks or failures. Ensuring the safety and effectiveness of CCS wells requires adherence to strict standards, including those set by Offshore Energies UK (OEUK). Certified well examiners play a crucial role in maintaining these standards throughout the life cycle of a well. These professionals, who are experts in geology, engineering and environmental science, ensure that the construction, operation and decommissioning/abandonment of wells comply with European guidelines, which are designed to ensure safe and environmentally sound drilling operations. The OEUK guidelines require regular inspections and maintenance checks to ensure ongoing compliance and operational safety. These inspections allow certified examiners to identify and address any potential problems in a timely manner, ensuring that any corrective actions are both timely and effective, minimising the risk of environmental impacts and operational failures.	This comment is the author's position **in favour of the implementation of the project**. Therefore, it does not need to be addressed in this Memorandum.
65	MARIA	HIM	04/03/2025	Positive	Nice copy paste, you call yourselves responsible citizens when you chew whatever they give you without processing it and even post it as your opinion! Obviously, you have no idea about the project, but the interests that motivate you keep you in check. Now, you are Turks, hoteliers or tavern owners who have raped the beaches of Thassos, you are orphans of Pappas and Kelidakis, who knows... It doesn't really matter, anyway, because no one understands who you are when you blindly say NO to an investment that will exceed 1 billion euros. Finally... We should be proud that our country aspires to lead the way in such an environmentally friendly sector, alongside countries that are models of environmental culture, such as Norway and Denmark, and some of the most advanced countries in Europe, such as the Netherlands, France and Germany, which some critics say and write has banned $CO_{(2)}$capture and storage projects.Have we really grasped the scale of the project? Approximately 20% of Greek industry's CO_2 emissions will be stored in the Prinos reservoir, three kilometres underground. Do we understand what this means for the environment? Do we understand what this means for industries that would otherwise have to gradually close down and move to other countries, as they cannot bear	This comment is the author's position **in favour of the project's implementation**. Therefore, it does not need to be answered in the context of this Memorandum.

No	Sender	Ref. No. Incoming	Date sent	Opinion	**Document comments** (the following comments are exact excerpts from the corresponding documents)	LDK comments
					the cost of emissions? Do we understand how much the role of the country and the region that will host one of the two projects scheduled to operate in the Mediterranean by 2030 will be upgraded?	

Supplementary Consultation Report on the EIA for the Project:

CO2 Storage Unit in Prinos

Date: 29 July 2025

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As part of the Environmental Impact Assessment (EIA) for the project "CO_2 Storage Unit in Prinos" (PET: 2408001614), and following the completion of the consultation process in accordance with the legislation in force, the following supplementary Consultation Report has been drawn up.

We note that this Report takes into account all the observations and comments made in writing in the supplementary memorandum of the Municipality of Thasos, which are presented in tabular form together with the corresponding responses.

Responses to the supplementary memorandum of the Municipality of Thasos regarding the EIA for underground CO_2 storage in Prinos

Subject	Response
I. Introduction	
1. From a review of the relevant EU and national legislation, as well as from the technical documentation, environmental impact studies and risk assessments accompanying the project's licensing file and available to us, it appears – and must be recognised by the Directorate-General for Environmental Policy – that the proposal and the draft permit do not meet the minimum criteria required by Directive 2009/31/EC for the safe and environmentally sound storage of CO2. In general, the proposal and the draft permit are inadequate in terms of the most important aspect of assessing the environmental suitability of such a project, namely the long-term treatment and management of CO2 storage, especially in relation to possible leaks, both large and small - gradual intensity, into the atmosphere, the water table, crops and, ultimately, the health and integrity of the entire ecosystem, including humans and animals. The EIA is over 1,700 pages long, including the Annexes and the Special Ecological Assessment. Despite its enormous size, critical risks and their management are identified and addressed with general academic language, while their impact is ultimately downplayed and assessed as negligible to moderate in the vast majority of cases. When the core of the major and critical risks to the natural and man-made environment ("high-risk hazards") is not addressed, the mitigation measures proposed are vague generalities accompanied by rudimentary actions and measures that do not, as they should, lead to the essence of addressing these risks. The residual risk, after the mitigation measures have been taken, is almost systematically ignored or, where it is mentioned, even the most basic measures for its management are not identified. It must be made clear from the outset that the absence of a methodology for monitoring residual risks in such a complex and complicated project as underground CO_2 storage, which will last for millennia, is not only an absolutely necessary action, but also a prerequisite for the protection of the man-made and natural environment of the region. It should be noted that the systematic degradation of risk assessment that is evident throughout the risk assessment completely ignores the possibility of a large-scale accident, such as SEVEZO, for which no provision whatsoever has been made. It is also absolutely necessary to emphasise that international experience in managing such risks is extremely limited, both in terms of technical knowledge and in terms of	TOPICS for discussion: - Compliance with Directive 2009/31/EC: Documentation of compliance with the requirements of Directive 2009/31/EC (Ministerial Decision 48416/2037/E.103/2011) As part of the "Application for CO2 Storage in the Prinos Reservoir", all technical studies and simulations were prepared and submitted to the competent state agency (EDEYEP), presenting, among other things, the mechanics of the reservoir, geomechanics, the three-dimensional static geological model of the earth, the characterisation of the dynamic behaviour of storage, the activities around the storage complex and possible interactions with these activities, as well as all the required studies and data in accordance with the requirements of phases 1-2-3 of the ANNEX to Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011). The EIA includes the conclusions of these studies that are considered useful by the researchers for the implementation of the EIA procedure, as, on the one hand, there is no provision for their inclusion as such in the EIA of the project (nor would it be useful), and on the other hand, due to their highly technical nature, these studies are examined and approved by specialised scientific staff of the competent licensing and supervisory authorities and are not subject to public consultation. In particular, it is noted that these studies have been duly submitted (ref. no. EDEYEP 22781/01.07.2022) and their completeness has been verified (ref. EDEYEP 22781/25.07.2024). This is also confirmed by the letter dated 4.04.2025 and ref. no. 27426/2025 from EDEYEP to the Ministry of Environment and Energy, in which EDEYEP gives its consent for the disbursement of the first instalment under the TAA. - Risk assessment and management: Mitigation measures & Monitoring plan - Methodology for monitoring residual risks In accordance with paragraph 3 of Article 5 of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006", a geological formation shall be selected as a storage site only if, under the proposed conditions of use, there is no significant risk of leakage or significant risk to the environment or health. The risk assessment was carried out in the context of the application submitted by EnEarth to EDEYEP on 30 June 2024 (Ref. No. 22781/EDEYEP) in order to determine the suitability of the geological formation as a CO2 storage site, pursuant to Article 173 of Law 4964/2022, and follows the content specified for Phase 3.3 of the assessment of the proposed storage complex in Annex I of Joint Ministerial Decision 48416/2037/E.103/2011. Therefore, the entire assessment, the absence of which the writer refers to in the comment, has been carried out extensively in the context of the application for a storage permit in accordance with the provisions of the Directive. The risk assessment includes, among other things, the following: i. Investigation of risk through the investigation of potential leakage events from the storage complex. In this context, the following are examined, among other things:

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bibliography, and even more so in terms of adopting mitigation measures to address them.	a) the possible leakage routes. b) the potential magnitude of leakage events for identical leakage pathways (flow rates). c) the critical parameters affecting potential leakage. d) the secondary effects of CO_2 storage, including displaced formation fluids and new substances that may be created by CO_2 storage. (e) any other factors that may pose a risk to human health or the environment (such as natural features associated with the project). ii. Exposure assessment — based on the characteristics of the environment, the distribution and activities of the human population above the storage complex, and the behaviour and fate of CO_2 leaking from potential pathways. iii. Effects assessment — based on the sensitivity of specific species, communities or habitats associated with potential leakage events (point i). iv. Risk characterisation — assessment of the safety and integrity of the site, in the short and long term, including an assessment of the risk of leakage under the proposed conditions of use and the environmental and health impacts in the worst-case scenario. For risks related to the subsoil, a comprehensive risk assessment was carried out using the bowtie analysis method to estimate the probability and potential quantities of leakage from various potential leakage routes. Based on the probability of failure for each means of protection, the bowtie analysis included a semi-quantitative risk assessment (SQRA) to estimate the probability of leakage for each different route. The estimation of leakage rates and rates as a percentage (%) of the total CO2 mass injected was determined in accordance with the guidelines of the UK Department of Energy and Climate Change report (2012), according to which leakage rates along escape pathways such as fractures or boreholes can be estimated based on the total CO2 mass injected. Similarly, the Geographic Range of Potential Risks presented schematically in Section 10.4 for each accident scenario is based on simulations using quantitative data rather than expert judgement. Therefore, it is particularly important to note that the risk analysis for the risks associated with the implementation and operation of the proposed project has been based, where possible, on quantitative and semi-quantitative methods, which, in combination with the judgment of the EIA experts and the technical studies of the project, led to the risk assessment.-quantitative methods, which, in combination with the judgment of the EIA experts and the technical studies of the project, led to the risk assessment for all project elements and for its entire life cycle. The leakage risks that may arise during the project's life cycle have been identified. Measures to mitigate and minimise risks to acceptable levels have also been highlighted. These include the construction of new injection wells with corrosion-resistant metallurgy, the planned abandonment of old wells, and the implementation of a comprehensive monitoring, measurement and verification plan to identify and address any anomalies in real time. Through these preventive measures, the project ensures safe and effective CO_2 storage while maintaining the integrity of the reservoir. In addition, in accordance with EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a corrective measures system measures are an integral part of the CO_2 storage permit for the Prinos storage site, and their prior approval by EDEYEP and the competent EU climate directorate is a prerequisite for the completion of the licensing process, which is fully covered by a study conducted by an international firm with experience in the relevant field.

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	In accordance with EU and national law, the monitoring programme is fully implemented both during the entire period of operation of the storage facility and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take account of changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology. […]any risk identified will be included in the Monitoring Plan (which is not a means of addressing but a means of detecting potential risks), so that the actions of the relevant contingency plan can be activated (which, although not covered by this EIA, it will nevertheless be submitted and approved by the competent supervisory authority of the central administration at the appropriate stage of the project's maturity) which is applicable in the event of any unexpected technical issue, until its full restoration. It should be noted that as part of the Monitoring, Measurement and Verification (MMV) Plan, abandoned wells will be subject to monitoring and continuous measurement. In addition, wells considered to be at greater risk have been identified for exclusive real-time monitoring and continuous evaluation throughout the project. Furthermore, there will be a specific intervention plan in case of any unforeseen events. The above is in line with industry procedures and best practices to ensure that no unexpected events occur, maintaining the safety and integrity of operations. The design and implementation of monitoring, measurement and verification of CO2 in the Prinos storage site is a requirement of the licensing process, which is fully covered by a study conducted by an international firm with experience in the relevant field, under the full approval of EDEYEP. In particular, it is recommended that the company proceed with the specification of the CO2 leak monitoring programme, in accordance with its obligations, to ensure that any leaks that may occur can be immediately detected and addressed. - Assessment of major disaster scenarios (SEVESO-like) The carbon dioxide storage project is not subject to Joint Ministerial Decision 172058/2016, which transposes Directive 2012/18/EU (known as Seveso III) into Greek law, as carbon dioxide is not included in the tables of dangerous substances in the Joint Ministerial Decision. - Lack of international experience According to the latest data from the Global CCS Institute, there are 50 CO2 storage projects in operation worldwide, with a further 630 in development. Similarly, in Europe, more than 40 projects with a capacity of 140 million tonnes per year are under development, with the aim of becoming operational by 2030 (19 projects in EU countries, with a capacity of 42 million tonnes per year by 2030). From the above, it is clear that there is abundant international expertise in CCS projects (the authors of this EIA have proven experience in conducting environmental licensing studies for CCS projects at an international level and, in particular, for a project of a very similar nature, namely: CO_2 storage project (Ravenna CCS) in depleted natural gas fields in the Adriatic Sea, off the coast of Ravenna in Italy. The project has begun trial operations (25,000 tonnes/year) with the prospect of reaching 16 million tonnes of CO2 per year. The CO_2 is transported via pipelines to the Porto Corsini Mare Ovest platform and injected at a depth of ~3,000 metres into the depleted Porto Corsini Mare Ovest reservoir. The project has many similarities with Prinos in particular: - Existing infrastructure was used – natural gas pipelines and offshore facilities - It is located within and in close proximity to protected areas, namely: ⇨ Within the Natura 2000 site, *Adriatico settentrionale – Emilia-Romagna* (code IT4060018)

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	⇨ The coastal area of Ravenna – with the forest areas of Pineta di Ravenna, Pineta di Casalborsetti and Porto Corsini – is part of the areas Natura 2000 Pineta di Casalborsetti, Pineta Staggioni, Duna di Porto Corsini (IT4070005) and Pineta di San Vitale, Bassa del Pirottolo (IT4070003 - The Porto Corsini Mare Ovest platform, where CO_2 injection takes place in Phase 1 of Ravenna CCS, is located approximately 6–12 nautical miles (11–22 km) off the coast of Ravenna–Casalborsetti - The onshore unit and pipelines are located on the coast (Casalborsetti) - The Ravenna area is highly developed for tourism and features extensive sandy beaches with organised facilities, water sports and open spaces, in an ideal environment for families. There is also a modern cruise terminal with arrivals of approximately 75,000 passengers/year and a marina with 1,074 berths. - There is intense fishing activity, mainly traditional fishing. In conclusion, the area is a multifaceted environment, combining fishermen and traditional fishing, intense ecotourism activity with water sports and environmental experiences, while also hosting a marina and cruise terminal. In other words, it is a vibrant coastal area with multiple uses – tourism, fishing and environmental – that coexist. All these elements closely resemble the natural and man-made environment of the Prinos area, and both areas are located in the Mediterranean region, sharing many common characteristics.
2. C02 storage technologies may be considered important for transforming Europe into a low-carbon economy in the short and medium term, but the climate benefits must in any case be assessed in the context of the potential risks to the environment and human health in the short, medium and long term. Furthermore, the principles of proportionality and, in particular, a just transition (which is now one of the key objectives of Union policies) require Member States to take all necessary measures to ensure that such projects are carried out in locations and under conditions that do not cause disproportionate adverse effects on the human and environmental factors of the affected area. To this end, in order to ensure the safety and security of CO2 storage, it is crucial to find sites that are capable of containing the CO2 injected for a long period of time, and this requires an understanding of the specific risks associated with particular sites (through risk assessment techniques) and the management of those risks.	In June 2020, EDEYEP published a study entitled "Underground geological storage of CO2 & natural gas in Greece" which assesses representative basins and other formations for carbon dioxide storage. It includes areas such as the Mesohellenic Trough (Central Greece), Western Macedonia and the Prinos Basin, with an emphasis on the Prinos & Epsilon deposits. Recently, a new study was also conducted in collaboration with EDEYEP, NTUA and SINTEF, entitled "The Hellenic CO2 Geological Storage Atlas", which includes additional basins in Greece. Prinos has already been assessed as the most suitable site for CO_2 geological storage in the EDEYEP study. This EIA does not assess the suitability of the site, but it does compile the results of relevant studies demonstrating the suitability of the site, including an assessment of the risk of leakage and the proposed monitoring programme.
3. As a consequence of the above, in our opinion, not all the mandatory provisions of European Directive 2009/31/EC, as harmonised with national legislation by Joint Ministerial Decision 48416|2037|E.103|2011 (Government Gazette 2516/8/7.11.2011), which sets out measures and conditions for the storage of carbon dioxide in geological formations. In particular, the above conditions and requirements for environmental suitability differ as follows:	All the provisions of the legislation have been complied with.

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II. Specific objections	
1. Inadequacy of the study in terms of establishing the suitability of the storage site	
1.1 General observation on the storage capacity of the Prinos Reservoir The study does not provide data on the CO2 storage capacity of the Prinos reservoir. The total CO2 injection/storage capacity at the Prinos facility, based on the data provided by ENERGEAN, is estimated at 66 million tonnes over the entire period of operation. However, this figure is not substantiated in a documented manner. The Hellenic Hydrocarbon Resources Management Company estimates the storage capacity of the Prinos reservoir to be much lower (19-20 million tonnes), which is also confirmed by the duration of exploitation (estimated at 20 to 25 years) with an annual injection volume of 1 million tonnes. Consequently, the storage capacity of the reservoir is considered to be particularly small and it will be filled in a very short time (less than 20 years), while the storage period will be eternal and the monitoring of the reservoir's behaviour will have to be ensured forever!	The total CO_2 injection/storage capacity at the Prinos facility was confirmed by a study conducted by a specialised foreign firm (Competent Persons Report - CPR 2024) at 66 million tonnes at P50. For this specific storage plan (1 million tonnes per year for 20 years) as described in the application submitted to EDEYEP, the amount of CO2 to be stored is 19-20 million tonnes, which is not the total capacity of the reservoir, which is three times greater..
1.2 Data collection In this case, no specific data is provided on the following: • The mechanics of the reservoir. • Geomechanics (specifically permeability and fracture pressure). The fact that the average CO2 pressure in reservoirs B (blue), C (red), Figure 6-27 of the study after 2035 and only for the 1 MTPA CO2 scenario increases continuously and reaches the maximum permissible limit, demonstrates the uncertainties that may be inherent in the model. Furthermore, no data are provided on the maximum CO2 pressure for the 3 MTPA CO2 scenario • the activities around the storage complex and the possible interactions with these activities (e.g. exploration, production and storage of hydrocarbons).	As part of the "Application $_{for\ CO_2}$ Storage in the Prinos Reservoir", a series of technical studies and simulations were prepared and submitted to the competent state agency (EDEYEP), presenting, among other things, the reservoir mechanics, geomechanics, the three-dimensional static geological model of the earth, the characterisation of the dynamic behaviour of storage, the activities around the storage complex and possible interactions with these activities, as well as all the required studies and data in accordance with the requirements of phases 1-2-3 of the ANNEX to Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011). The EIA includes the conclusions of these studies that are considered useful by the researchers for the implementation of the EIA procedure, as, on the one hand, there is no provision for their inclusion as such in the EIA of the project (nor would it be useful), and on the other hand, due to their highly technical nature, these studies are duly approved by specialised scientific staff of the competent licensing and supervisory authorities and are not subject to public consultation. Therefore, the commenter's assertion that "not all the mandatory provisions of European Directive 2009/31/EC, as harmonised with national legislation by Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011), which sets out measures and conditions for the storage of carbon dioxide in geological formations" is not valid under any circumstances, as the relevant studies have been submitted, reviewed and approved by specialised scientific personnel from the competent licensing and supervisory authorities. With regard to the section of the Comment referring to drilling, it should be noted that, as part of the Monitoring, Measurement and Verification (MMV) Plan, abandoned wells will be subject to monitoring and continuous measurement. In addition, wells considered to be of higher risk have been identified for exclusive real-time monitoring and continuous assessment throughout the project. Furthermore, there will be a specific intervention plan in case of any unforeseen events. The above is in line with industry procedures and best practices to ensure that no unexpected events occur, maintaining the safety and integrity of operations.
1.3 Three-dimensional static geological model of the earth The uncertainty associated with each of the parameters used used to construct the model, by developing a range of scenarios for each parameter and calculating the appropriate confidence limits. Furthermore, no assessment was made of any	

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uncertainty associated with the model itself, even though all of the above safeguards must be taken into account in accordance with the text of the Directive.	The design and implementation of monitoring, measurement and verification at the Prinos storage site is a requirement of the licensing procedure for the granting of the Storage Permit under Joint Ministerial Decision 48416/2037/E.103/2011 and European legislation (Directive 2009/31/EC), and is fully addressed by a study conducted by an international firm with experience in the relevant field, which has been submitted and is currently being evaluated by EDEYEP.
1.4 Characterisation of the dynamic behaviour of storage. According to the provisions of phase 3 of the ANNEX, at least the following factors should have been examined: a) possible injection rates and properties of the CO_2 stream b) reactive processes (i.e. how reactions between injected CO_2 and in situ minerals are fed back into the model) c) reservoir simulator used (multiple simulations may be required to validate certain findings) d) short-term and long-term simulations (to determine the fate and behaviour of CO_2 over decades and millennia, including the rate of CO2 dissolution in water). The above parameters are not adequately addressed in the EIA, and there are not enough simulations and laboratory tests on pressure management during the CO_2 injection process. The pressure and temperature of the CO2 storage formation as a function of the injection rate and the cumulative injected amount over time and the pressure gradients at the storage site are not yet examined. The rates of fracture sealing, changes in the fluid chemistry of the formation and subsequent reactions, the consideration of reactive models for the assessment of effects, critical parameters affecting potential leakage (e.g. maximum reservoir pressure, maximum injection rate, temperature, sensitivity to various assumptions in static geological models of the earth). Finally, the reference on page 10-284 of the EIA: *"Of the 76 wells from the Prinos platform complex, 29 have acceptable barriers (low risk), 7 are out of structure, 28 are considered acceptable (medium risk) and 12 are considered unacceptable (high risk)",* reinforces the possibility of CO2 leakage.	
1.5 Failure of the project under consideration to comply with the spatial planning of the area In the Region of Eastern Macedonia and Thrace, within the framework defined by Law 4447/2016, with Ministerial Decision YPEN/DXORS/68605/1092 (Government Gazette 248|AAP/ 25-10-2018), the Regional Spatial Framework (RSF) of the Region of Eastern Macedonia and Thrace was approved. Specifically, in Article 19, paragraph 4, page 2577 of the RSP, a general condition is set out according to which: in	the Region of Eastern Macedonia and Thrace, within the framework defined by Law 4447/2016, with Ministerial Decision YPEN/DXORS/68605/1092 (Government Gazette 248/AAP/25-10-2018), the Regional Spatial Framework (RSF) of the Region of Eastern Macedonia and Thrace was approved. The RSFP of Eastern Macedonia and Thrace aims to formulate a comprehensive strategic programme of spatial policies for the region, which will constitute the basic framework for spatial, urban planning and development choices for the period of its validity. At the same time, the Regional Spatial Plan is also approved by the region itself in environmental terms, as it revises and replaces the previous Regional Framework for Spatial Planning and Sustainable Development. The Regional Spatial Plan for Eastern Macedonia and Thrace does not provide for specific regulations for CCS projects, but does not include any relevant prohibitions either.

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The guidelines for addressing and adapting to climate change should be taken into account in the design and implementation of the Plan's projects and actions. In this case, the researchers arbitrarily assume, as an interpretation of the general term, that the planned unit is compatible with the general guidelines on climate change, even though this is not provided for in the Spatial Plan. According to the logic of the authors of the EIA, it would also be possible to install any storage unit or factory that could potentially have positive effects on the environment (i.e. even a nuclear power plant). Therefore, the statements in paragraph 2.3, p. 2-9 of the EIA regarding the compatibility of the project cannot be accepted.	related to their implementation or location in the proposed study area. Furthermore, the only relevant reference in the specific P.C.P. related to the proposed project concerns Article 19 of the P.C.P., which sets a condition according to which: the design and implementation of projects and actions under the Plan should take into account the guidelines for addressing and adapting to climate change. At a minimum, projects should be compatible with national and local greenhouse gas emission reduction plans and national energy planning, as well as with the national climate change adaptation plan (Articles 42 and 45 of Law 4414/2016) and the corresponding regional adaptation plans (Article 43 of Law 4414/2016). Therefore, the project under study aims to mitigate the effects of climate change through carbon dioxide storage and does not conflict with the objectives set by the PPCHSA for the same purpose.The fact that a project is not provided for in a Regional Spatial Framework (such as the Regional Spatial Framework of Eastern Macedonia and Thrace) does not mean that its implementation is not permitted, provided that it is not expressly prohibited by the Regional Spatial Framework.P and its implementation does not conflict with the provisions of the legal and spatial planning regime governing the implementation of similar projects. In particular, with regard to the example of the implementation of a nuclear power plant, there are a number of provisions which, upon evaluation, could be deemed incompatible, which is not the case for the CO_2 storage facility, which has already been deemed fully compatible. In addition, it is important to note that MSPs in general focus on the organisation of land areas and not maritime space. Consequently, the MSP has not assessed and does not cover the organisation of maritime space and, therefore, the uses developed in offshore areas, where most of the project is being developed and where the storage reservoir is located. In this sense, the project in question falls outside the actual remit of the P.C.P. It is also important to note that the suitability of the site is determined solely by the existence of the appropriate natural formation. Consequently, its location is not chosen on the basis of spatial planning criteria in a context of balance between possible proposed uses, but because of the suitability of the formation in question, which has been determined by nature. By analogy, this is the case in most instances, especially in the extractive industry, a typical example of which is the existence and operation of mining activities for more than forty (40) years in the same area of Prinos.
1.6 Significant Environmental Parameters In Chapter 10.1.2.1 "(Table 10-1: Identification and Assessment of Significant Environmental Parameters of the Study Area), the significant environmental parameters are identified and assessed. In this chapter, we see that, apart from the parameters of "Climate Change", "birdlife", "marine habitats" and "protected areas" are characterised as "critical", all other parameters are assessed as being of low to moderate importance. And, of course, all this in an area of "high" natural importance (the marine area of Kavala-Thasos, the Nestos Delta and the lagoons of Karamoti and Thasopoula, Mount Ypsario and the coastal zone). Factors such as "tectonic vulnerability", "seabed", "marine waters", "groundwater", "fish fauna" and "structure of the anthropogenic environment" are characterised as moderate.	- Adequacy of the categorisation of SPAs in the study area - Risk assessment and management (CO_2 leaks from geological storage formations) With regard to the comment on the categorisation of SPAs in Chapter 10.1.2.1, the following should be noted: - According to Table 10-1 of the EIA, the SPAs explicitly assessed as being of high importance are as follows: Climate change, Marine mammals, Avifauna, Protected areas, Other important natural areas, Socio-economic environment, Health. - As regards the documentation of the categorisation of the SPAs, the categorisation of each parameter (as low, moderate or high importance) was based on specific data on the existing situation (Chapter 8 of the EIA), on sampling findings and on identified conditions of spatial and functional relevance to the project. For example: Tectonic vulnerability (as part of the geodynamic situation) is assessed as being of moderate importance, following an analysis of the seismic risk in the area and the tectonic context (see Chapter 10.1.2.1 – Tectonics). The seabed and marine waters are assessed on the basis of laboratory data (Baseline Study 2015, EPP 2020, EPP 2023), which document the absence of significant pollution or sensitive substrates. Marine and groundwater are assessed as being of moderate importance, with reference to both national monitoring data

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, while factors such as 'geology', 'soil' and 'marine habitats' are classified as low importance. The above categorisation, without the necessary substantive documentation, in itself suggests that the authors of the EIA have chosen to avoid including factors such as 'tectonic vulnerability', "seabed," "marine waters," "groundwater", "fish fauna" and "structure of the man-made environment" in the high-risk category, which would lead them to adopt appropriate mitigation measures, without it being certain that such measures exist to be implemented. However, the most critical fact is that if, for any reason, small or large CO_2 leaks are detected from geological storage formations, there are essentially no mitigation measures or residual risk management measures in place, because international experience in this area is extremely limited. In this light, the possibility of limiting the impact is particularly 7 small to impossible, and the results are irreversible.	(e.g. EPP 2023, SDAP), as well as the spatial distance from recipients. Therefore, the documentation is present, transparent and in line with the principle of proportionality, as provided for in the current institutional framework. - The approach adopted in Chapter 10.1.2.1 is based on the identification of the SPAs that characterise the environment of the study area, but also on a weighted assessment of their degree of sensitivity and potential susceptibility to the specific project. The methodology does not aim to limit the impact mitigation measures, but to design them rationally. As shown in the relevant chapters, measures and monitoring have also been provided for parameters of low or moderate importance, where necessary. - Regarding the comment on a possible intention to downplay environmental risks, it is understood that the commentator's concern focuses on the need to provide adequate and effective protection measures for all environmental parameters. However, the categorisation of SPAs into levels of importance does not negate their recognition, analysis or evaluation, but is a fundamental methodological tool for weighing and prioritising impacts in accordance with the principles of EIA. The methodology adopted for the categorisation of SPAs is fully in line with the principles of scientific completeness, proportionality and documentation. The EIA provides clear and distinct documentation for each parameter, ensuring that the assessment is substantive and not merely formal. For the issue of risk assessment and management (CO_2 leaks from geological storage formations), please refer to Comment 1.1. Reversibility is described in the EIA as one of the criteria for assessing the significance of the environmental impacts that may be caused by the project activities. The term "irreversible" has not been applied to any of the potential environmental impacts that may be caused by the project activities in the EIA. Taking into account the nature of the geological formation, as well as the obligation to implement the monitoring, measurement and verification programme (MMV) and the Emergency Response Plan under Directive 2009/31/EC, the potential environmental impacts of small or large CO2 leaks are assessed in the EIA to be local in nature and manageable. Even in the event of a larger leak, the implementation of immediate and adequate remediation measures can significantly limit the intensity and duration of the impacts, making them essentially partially or fully reversible.
1.7 Environmental and Social Impact Assessment Table 10-2 (pages 10-23 to 10-25) analyses the qualitative assessment criteria for calculating the significance of the impact, such as *intensity (IN), extent (EX), period of occurrence (MO), duration (PE), reversibility (RV), synergy (SI), accumulation (AC), type of effect (EF), periodicity (PR) and recovery (MC)*, and Table 10-3 gives the scoring of the qualitative assessment criteria. Paragraph 10.1.2.3, Residual Risk, provides a definition of residual risks in cases where they are categorised as moderate, significant and critical. However, if you go through the entire risk assessment, i.e. chapters 10, 11 and 12, you will not find any further reference to residual risk management and, consequently, to the need to take further mitigation measures, even in cases where reference is made to measures for the Prevention of Significant Irregularities, paragraph 11.5.2 and Table 11-4 (pages 11-58 to 11-64), the concept of residual risk management is completely absent. In paragraph 10.1.3.2. (Risk assessment methodology) and on page 10-32 the following is noted:	- Environmental and Social Impact Assessment - Methodology for assessing and managing residual risks Table 10-3 is not a stand-alone table but rather part of the overall impact assessment methodology, which, as mentioned in section 10.1.2, consists of two steps: • Step 1: Identification and evaluation of the Valued Environmental Parameters (VEPs or Valued Receptors-VRs) of the natural and man-made environment of the study area. • Step 2: Assessment and evaluation of the Potential Significant Impacts from the normal activities of the construction and operation phases of the Project under consideration. The final assessment of each potential impact results from the interaction between the nature of each impact (nature, significance and magnitude) and the significance of each VRE (Table 10-1). Therefore, the overall assessment and evaluation of each potential impact depends on the inherent significance of the impact, the sensitivity and the quality of the environment.

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"For risks related to the subsoil, a comprehensive risk assessment was carried out using the bowtie analysis method to estimate the probability and potential quantities of leakage from various potential leakage routes. Based on the probability of failure for each means of protection, the bowtie analysis included a semi-quantitative risk assessment (SQRA) to estimate the probability of leakage for each different pathway. The estimation of leakage rates and rates as a percentage (%) of the total CO2 mass injected was determined in accordance with the guidelines of the UK Department of Energy and Climate Change report (2012), according to which leakage rates along escape pathways such as fractures or boreholes can be estimated based on the total CO2 mass injected. *It is important to note that, although the semi-quantitative risk assessment (SQRA) produces numerical values, these are based entirely on the judgement of experts in the field, as there is limited data available on long-term geological storage of CO2. Therefore, the results of the SQRA should only be considered as indicative values for comparing relative risks rather than for deriving absolute values.* *Given the early stage of planning of the Prinos CO2 Storage Project, the risk assessment study also aims to propose mitigation or prevention measures to be implemented in future stages of the Project.* The above wording itself accepts that the assessment of risks related to the subsoil is based entirely on the judgement of "experts" in the field, as there is limited data on long-term geological storage of CO2. Of course, nowhere does it tell us, as it should, from which measurements this data was derived, who the "experts" are who judged it to be such, and where their expertise in the field of underground CO2 storage comes from.	The methodology used is based on the Conesa method (Conesa, 2010), which was developed and adapted by the study team so that, on the one hand, it aligns with international guidelines, the relevant national and EU legislation, as well as internationally best available practices, and on the other hand, to respond to the best possible degree of functionality in accordance with the technical parameters of the project under study and the environmental characteristics of the study area. Based on this method, the assessment of the significance of the impact of a project or activity on an environmental parameter is derived from the assessment of the likelihood of the project/activity having an impact, in conjunction with specific variables, such as, among others the intensity of the intervention, the extent and duration of the resulting impact. The significance of the impacts is assessed on the basis of the qualitative result caused by each impact, which in turn is defined as the ratio by which the environmental impact is measured on the basis of the degree of intensity of the change produced and the characterisation of the impact. This characterisation is based on qualitative criteria such as intensity (IN), extent (EX), period of occurrence (MO), duration (PE), reversibility (RV), synergy (SI), accumulation (AC), effect type (EF), periodicity (PR) and recovery (MC). With the help of the calibration of the above criteria, an attempt is made to quantify the effects based on the following equation: $Im = S * (3 * IN + 2 * EX + MO + PE + RV + SI + EF + PR + MC + AC)$ The application of this impact assessment methodology is a specialisation of the EIA process requirements, with the aim of moving from the usual qualitative (and mainly subjective) assessment to a quantitative, measurable and more objective assessment of environmental impacts. Paragraph 10.1.2.3 describes the concept of residual impacts, which, as correctly stated in the comment, if assessed as moderate, significant or critical, must be reassessed after the implementation of countermeasures/mitigation measures. In Chapter 10.2, where the above methodology is applied to each environmental parameter, clear reference is made to the expected impacts and, where they are moderate, significant or critical, clear reference is made to the relevant measures (Chapter 11) and they are finally assessed as minor after their implementation. E.g.:

[1] International Finance Corporation (IFC). A Guide to Biodiversity for the Private Sector: The Social and Environmental Impact Assessment Process: https://www.ifc.org/wps/wcm/connect/9608497e-56e8-4074-bab6-45c61a36a4ad/ESIA.pdf?MOD=AJPERES&CVID=jkCYZ3G

[2] European Bank for Reconstruction and Development (EBRD). Guidance Note: EBRD Performance Requirement 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources: https://www.ebrd.com/downloads/about/sustainability/ESP_PR06_Eng.pd

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Οι αναμενόμενες ποσότητες των εκπομπών ΑτΘ από την υλοποίηση των γεωτρητικών εργασιών, εκτιμάται ότι είναι σχετικά περιορισμένες και ως εκ τούτου ως προς τη σημασία τους οι συγκεκριμένες επιπτώσεις αξιολογούνται ως αρνητικές, μέσης έντασης, εστιασμένες σε τοπικό επίπεδο, άμεσες ως προς την περίοδο εμφάνισης τους, προσωρινής διάρκειας, βραχυπρόθεσμης αναστρεψιμότητας, συνεργιστικές, αωρευτικές, άμεσες ως προς την επίδραση τους, συνεχείς και άμεσα αποκαταστάσιμες. Ως προς την Τελική Αξιολόγηση τους, οι εν λόγω επιπτώσεις αξιολογούνται ως **Μέτριες.**

Καθώς ως προς την Τελική Αξιολόγηση τους, οι εν λόγω επιπτώσεις αξιολογούνται ως **Μέτριες**, στα πλαίσια της παρούσας προτείνονται μέτρα πρόληψης/μετριασμού/αντιμετώπισης έτσι ώστε οι εν λόγω επιπτώσεις να καταστούν τουλάχιστον μικρές. Έπειτα από την εφαρμογή των σχετικών μέτρων που προτείνονται στο **Κεφάλαιο 11** της παρούσας, οι υπολειμματικές επιπτώσεις τελικώς αξιολογούνται ως **Μικρές** και συνεπώς το έργο είναι συμβατό με τους στόχους προστασίας του περιβάλλοντος που αποτελούν προαπαιτούμενα της παρούσας μελέτης.

Δραστηριότητα	Αποδέκτης	Μέγεθος Επίπτωσης												Σημασία Επίπτωσης	Σημασία ΣΠΠ	Τελική Αξιολόγηση Επίπτωσης	Τελική Αξιολόγηση Υπολειμματικής Επίπτωσης
		S (Φύση)	IN (Ένταση)	EX (Έκταση)	MO (Περίοδος εμφάνισης)	PE (Διάρκεια)	RV (Αναστρεψιμότητα)	SI (Συνέργεια)	EF (Επίδραση)	PR (Παραδοξότητα)	MC (Αποκατάσταση)	AC (Συσσώρευση)	Im (Μέγεθος Επίπτωσης)				
Εκπομπές ΑτΘ από την κατασκευή των	Κλίμα / Κλιματική αλλαγή	-	1	2	4	1	1	2	4	2	1	4	26	Μικρή	Υψηλή	Μέτρια	Μικρή

Similarly, Table 10-19 summarises both the impact assessment and the final assessment of the residual impact after the implementation of countermeasures/mitigation measures.

Πίνακας 10-19: Σύνοψη χαρακτηριστικών, σημασίας, μεγέθους και Τελικής Αξιολόγησης των επιπτώσεων, στις επιμέρους περιβαλλοντικές παραμέτρους κατά την Φάση Κατασκευής του προτεινόμενου έργου

ΚΑΤΑΣΚΕΥΗ - Δραστηριότητα	Αποδέκτης	Μέγεθος Επίπτωσης												Σημασία Επίπτωσης	Σημασία ΣΠΠ	Τελική Αξιολόγηση Επίπτωσης	Τελική Αξιολόγηση Υπολειμματικής Επίπτωσης
		S (Φύση)	IN (Ένταση)	EX (Έκταση)	MO (Περίοδος εμφάνισης)	PE (Διάρκεια)	RV (Αναστρεψιμότητα)	SI (Συνέργεια)	EF (Επίδραση)	PR (Παραδοξότητα)	MC (Αποκατάσταση)	AC (Συσσώρευση)	Im (Μέγεθος Επίπτωσης)				
ΚΛΙΜΑΤΙΚΑ ΚΑΙ ΒΙΟΚΛΙΜΑΤΙΚΑ ΧΑΡΑΚΤΗΡΙΣΤΙΚΑ																	
Εκπομπές ΑτΘ από την κατασκευή των χερσαίων εγκαταστάσεων	Κλίμα / Κλιματική αλλαγή	-	1	2	4	1	1	2	4	2	1	4	26	Μικρή	Υψηλή	Μέτρια	Μικρή
Εκπομπές ΑτΘ από την κατασκευή του αγωγού μεταφοράς CO_2	Κλίμα / Κλιματική αλλαγή	-	4	2	4	1	1	2	4	2	1	4	35	Μικρή	Υψηλή	Μέτρια	Μικρή
Εκπομπές ΑτΘ από τις γεωτρητικές εργασίες	Κλίμα / Κλιματική αλλαγή	-	4	2	4	1	1	2	4	4	1	4	37	Μικρή	Υψηλή	Μέτρια	Μικρή
ΜΟΡΦΟΛΟΓΙΚΑ ΚΑΙ ΤΟΠΙΟΛΟΓΙΚΑ ΧΑΡΑΚΤΗΡΙΣΤΙΚΑ																	
Κατασκευή των χερσαίων εγκαταστάσεων	Μορφολογία χερσαίας έκτασης	-	1	1	4	1	2	1	4	4	1	1	23	Μικρή	Χαμηλή	Αμελητέα	Αμελητέα
Κατασκευή των χερσαίων εγκαταστάσεων	Τοπίο	-	1	2	4	1	2	2	4	4	1	1	26	Μικρή	Μέτρια	Μικρή	Μικρή
Κατασκευή του αγωγού μεταφοράς CO_2	Μορφολογία θαλάσσιου πυθμένα	-	4	1	4	1	2	1	4	4	1	1	32	Μικρή	Χαμηλή	Αμελητέα	Αμελητέα

As clearly stated in the conclusions of this chapter, e.g. for Construction:

"...the Final Impact Assessments during the normal activities of the implementation phase of the proposed project did not exceed the classification 'Minor', with the exception

the following, which were assessed as "Moderate" as follows:

- *Impacts on Climate/Climate Change from GHG emissions from the construction of land facilities, GHG emissions from the construction of the CO_2 transport pipeline, GHG emissions from drilling operations.*
- *Impacts on the Natural Environment from the construction of the CO_2 transport pipeline and drilling operations.*

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	For the impacts assessed as "Moderate", following the implementation of the relevant measures proposed in Chapter 11 of this document, the residual impacts are ultimately assessed as "Minor" and therefore the project is compatible with the environmental protection objectives that are prerequisites of this study. The conclusions for the operational phase and the decommissioning/removal phase are also mentioned. A similar methodology is applied to the impacts arising from the project's vulnerability to risks of serious accidents or disasters related to the project (Chapter 10.4), climate risks (Chapter 10.5), cumulative/synergistic impacts (Chapter 10.6) and transboundary impacts (Chapter 10.7). Chapter 11 details all the response and mitigation measures that have been taken into account in the final assessment of residual impacts, with the aim of ensuring that no residual impacts are assessed as moderate, significant or critical. In addition, all risk prevention and mitigation measures (Chapter 11.5) are described in detail after the implementation of ALARP (As Low As Reasonably Practicable) measures. - Use of the Bowtie methodology & Semi-Quantitative Risk Assessment (SQRA) The Bowtie method is a diagrammatic representation of potential hazards, causes, consequences, control measures and the effectiveness of measures. The use of the Bow-Tie method significantly improves safety and provides a clear and accessible way to implement best practice in risk management. It is a reliable preventive approach and an effective safety management tool. However, the risk assessment, as summarised in Section 10.4 of the EIA, has not been based entirely on the judgement of experts in the field, but on internationally recognised reliable methodologies, as described below. According to paragraph 3 of Article 5 of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006", a geological formation shall be selected as a storage site only if, under the proposed conditions of use, there is no significant risk of leakage or significant risk to the environment or health. The risk assessment was carried out in the context of the application submitted by EnEarth to EDEYEP on 30 June 2024 (Ref. No. 22781/EDEYEP) in order to determine the suitability of the geological formation as a CO2 storage site, pursuant to Article 173 of Law 4964/2022 and follows the content specified for Phase 3.3 of the assessment of the proposed storage complex in Annex I of Joint Ministerial Decision 48416/2037/E.103/2011. The risk assessment includes, among other things, the following: - Risk investigation through the investigation of potential leakage events from the storage complex. In this context, the following are examined, among other things: a) possible leakage routes. b) the possible magnitude of leakage events for identical leakage routes (flow rates). c) the critical parameters affecting the possible leakage.

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	d) the secondary effects of CO_2 storage, including displaced formation fluids and new substances that may be created by CO_2 storage. (e) any other factors that may pose a risk to human health or the environment (such as natural structures associated with the project). - Exposure assessment — based on the characteristics of the environment, the distribution and activities of the human population above the storage complex, and the behaviour and fate of CO_2 leaking from potential pathways. - Effects assessment — based on the sensitivity of specific species, communities or habitats associated with potential leakage events (point (i)). - Risk characterisation — assessment of the safety and integrity of the site, in the short and long term, including an assessment of the risk of leakage under the proposed conditions of use and the environmental and health impacts in the worst-case scenario. For risks related to the subsoil, a comprehensive risk assessment was carried out using the bowtie analysis method to estimate the probability and potential quantities of leakage from various potential leakage routes. Based on the probability of failure for each means of protection, the bowtie analysis included a semi-quantitative risk assessment (SQRA) to estimate the probability of leakage for each different route. The estimation of leakage rates and rates as a percentage (%) of the total CO2 mass injected was determined in accordance with the guidelines of the UK Department of Energy and Climate Change report (2012), according to which leakage rates along escape pathways such as fractures or boreholes can be estimated based on the total injected CO2 mass. Similarly, the Geographic Range of Potential Risks presented schematically in Section 10.4 for each accident scenario is based on simulations using quantitative data rather than expert judgement. Therefore, it is particularly important to note that the risk analysis for the risks associated with the implementation and operation of the proposed project has been based, where possible, on quantitative and semi-quantitative methods, which, in combination with the judgment of the EIA experts and the technical studies of the project, led to the risk assessment.-quantitative methods, which, in combination with the judgment of the EIA's expert consultants and the project's technical studies, led to the risk assessment for all project components and for its entire life cycle.
1.8 Geology of the area: (page 10-7 table of the EIA) On page 10-83, the authors of the EIA inform us that *"the Energean technical team is developing and implementing scenarios with the estimated CO_2 to be stored, the potential sources of CO_2, the CO_2 transport network and the relevant synergies. During the first half of 2024, a series of additional subsurface studies were carried out, which matured the project as they identified and limited the risks of the Project."* The above studies included simulations of the tectonic conditions in the area and the suitability (and safety) of the area for the location of the project under consideration. These studies documented that the Prinos basin is a tectonically stable area, as required for CO2 storage areas in terms of tectonic (seismic) activity, and that the potential impacts of the project on	The studies carried out and submitted for evaluation to EDEYEP are in accordance with Annex I of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006" These studies, which are submitted as part of the assessment procedure for the granting of a storage permit, are evaluated not only by EDEYEP but also by the competent directorate of the European Commission (DG Clima) in accordance with the provisions of Directive 2009/31/EC.

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The seismic risk in the area is negligible, given that the project is operating at the planned injection rate and within safe operating parameters. However, there is no mention anywhere of what these additional studies are, what their content is, who evaluated them and on the basis of what data they limited the risks of the project. It is clear that this is a serious violation of the requirements of Directive 2009/31. Obviously, the assessment of the suitability of the geological formation for CO_2 storage based exclusively on data from Energean's technical team, with special studies and 3D terrain simulations carried out by the company itself, cannot be considered to provide sufficient guarantees to ensure the suitability of the geological design. This is because Energean has long-standing experience in oil and natural gas extraction, but not in CO2 storage.	
1.9 Tectonics On page 10-84 of the EIA, there are multiple vague statements regarding the exact consequences of the project on the tectonic characteristics of the area. In particular, it states that: "*Although the impact on the tectonic characteristics of the area during the operation of the new injection wells is less likely and essentially negligible, provided that the project is operated safely, it is nevertheless real and therefore, in terms of its significance, this impact is assessed as negative, moderate in intensity, local, immediate in terms of the period of occurrence, long-term, reversible in the short term, non-synergistic, non-cumulative, immediate in terms of its effect, discontinuous and immediately reversible. Therefore, in terms of the Final Assessment, this impact is assessed as Minor.* The use of these vague and ambiguous terms has the sole purpose of concealing the adverse consequences and "exempting" the Project Management Body from the critical risk management study.	There is no ambiguity in the excerpt quoted by the author of the Comment. This excerpt is the conclusion of the potential impacts of the project on the geological, tectonic and soil characteristics of the area as a result of the operation of the project under consideration (Section 10.2.3.2). It faithfully follows the EIA methodology described in 'Section 10.1.2.2.1 Calculation of the Significance of Impacts'. The methodology described in detail in this Section, and in particular the explanations in Table 10 2: Criteria for the Qualitative Assessment of the Environmental and Social Impacts of the Project allows for a complete and unambiguous understanding of the project's impacts, as assessed and recorded.
1.10 Seismicity Paragraph 8.4.4.2, entitled "Seismic Risk", incorrectly states that the onshore and offshore areas of the project are classified in seismic risk zone 1, i.e. the lowest category, with explicit reference to the Greek Anti-Seismic Regulation EAK 2000 in order to conclude that there is no seismic risk. However, in its introduction, the EAK states that *it "covers so-called normal risk projects, i.e. projects whose potential damage is limited to the project itself, its contents or its immediate vicinity"*. On the contrary, the EAK does not cover: *"High-risk projects, whose potential failure could have serious consequences for people and the environment in a wider*	The reference to the seismic risk zone in accordance with the Greek Anti-Seismic Regulation EAK 2000 is not made in order to authorise the construction of the project's infrastructure on the basis of its static adequacy or to implement the technical design of the project (which are not the subject of an EIA), but to present the intensity of the seismic risk in the area and draw the relevant conclusions from an environmental point of view. Based on EAK 2000, the study area is classified in seismic risk zone I, i.e. the lowest category, which shows that, compared to the surrounding areas (Northern Aegean, Chalkidiki, etc.), the study area is characterised by reduced seismicity. This conclusion is also confirmed by the "Seismotectonic Study of the Kavala Region - Geometry and Kinematics of Active Structures based on Seismological, Geological and Geodetic Data" conducted by the Geodynamic Institute of the National Observatory of Athens, which examined the historical and instrumental seismicity of the Prinos basin and the surrounding areas (Orfanou basin, Thasos, wider Kavala area). Similarly, this study also shows that the Prinos basin, in relation to the surrounding areas (Northern Aegean, Chalkidiki, etc.), is characterised by reduced seismicity.

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area outside the project area (e.g. dams, nuclear power plants) as well as marine projects" such as the one under consideration, during the lifetime of which (millennia) it is certain that high-intensity seismic events will occur, while there are no specific studies within the EIA that prove the contrary. Furthermore, although the study refers to five (5) active faults, according to the seismotectonic investigation of the Kavala-Prinos area by the Geodynamic Institute, National Observatory of Athens, the area is characterised as tectonically stable throughout the text. However, it is widely known in scientific circles that there is no aseismic area in Greece; the entire country is tectonically active. The study mentions the 3.8 Richter earthquake 28.3 km northwest of Serres and omits significant seismic events in the area under consideration (red rectangle), such as the 7.3 Richter earthquake in Drama (on 05-05-1829) with significant damage in Eleftheroupoli, Kavala and Xanthi, as well as an earthquake > 6.0 Richter between Thasos and Mount Athos (shown as a star on the study map in Figure 8-57 without being mentioned in the study text). The EIA ignores widely available data (such as the Seismotectonic Atlas of Greece, which is widely used in Geological Suitability Studies), the existence of active faults at a relatively close distance (e.g., the Kavala-Xanthi fault), and the possibility of impacts on the project from a potential earthquake with an epicentre outside the immediate vicinity (e.g., the also nearby "North Anatolian Fault"). On the same map, the Prinos reservoir does not coincide with the centre of the red rectangle, without any explanation for this, unlike the blue rectangle. If the red rectangle is placed centrally in relation to the Prinos reservoir, then other significant seismic events will also be included in the area, mainly in the space between Thasos and Mount Athos. Finally, despite the fact that paragraph 10.1.2.1 (page 10-7-table) states that: *"Although the Prinos basin is a tectonically stable area (as required for C02 storage areas in terms of tectonics (seismic activity), as theoretically C02 storage projects in semi-depleted reservoirs may, under certain conditions, affect the tectonics of the area (the vulnerability of the project to phenomena related to the tectonics of the area is examined in Section 10.13), this SEA is assessed as being of 'Moderate significance'.* It is noted that section 10.13 referred to in the EIA does not correspond accurately to the text. Therefore, from this point of view, there are also shortcomings in the EIA. In other words, this is an inadequate and by no means comprehensive approach to the seismic risks in the area, which should have been assessed on the basis of all the data for the wider region of Thrace. This is because such assessments must be based on sufficient data on seismicity (cf. Annex I to Directive 2009/31) and cannot based solely on data collected (according to unknown specifications and methodologies) by the	Consequently, as documented above, the reference to seismic hazard zones in accordance with the Greek Anti-Seismic Regulation EAK 2000 in the context of the EIA is not made in order to authorise the construction of the project's infrastructure in terms of its static adequacy, but to demonstrate the relatively low seismicity of the study area, a purpose which it serves extremely well as it presents the seismic risk for the whole of Greece in a uniform, easily understandable and objective manner. Finally, it should be noted that the EIA does not claim that "there is no seismic risk", as the comment inaccurately states, but that the area is characterised by reduced seismicity. For this reason, the impacts related to seismicity are examined both in the context of normal/usual construction, operation and decommissioning of the project, as well as in the context of impacts arising from the project's vulnerability to risks of serious accidents or disasters related to the project (see, for example, Section 10.4.1.4.1 of the EIA).

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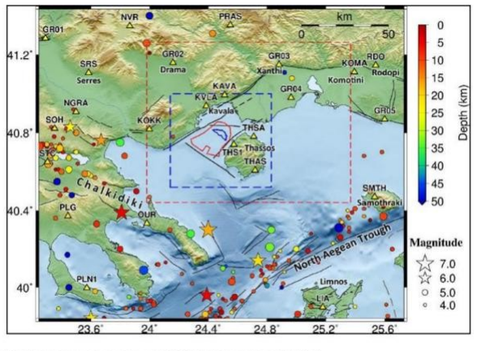
any interested operator, which cannot in fact be considered objective and reliable in the context of such a procedure. In addition, the study itself states on page 11-67: "The following are mentioned as measures to prevent and mitigate the effects of earthquakes: *'Appropriate drilling design so as not to cause fracturing from seismic activity'*. Furthermore, paragraph 10.4.1.4.1 entitled Induced Seismicity (table) states: " *CO2 injection into geological*  (Πηγή: Κατάλογος σεισμικών γεγονότων 1900-2009, Makropoulos et.al 2012) Σχήμα 8-57: Σεισμικότητα των ετών 1900-2009 στην ευρύτερη περιοχή μελέτης *formations may increase the pressure within the rock formations, potentially causing seismic events."* The same table states that this risk will be mitigated by *"Continuous monitoring of seismic activity and controlled injection rates".* The above indicates the existence of multiple contradictions regarding the riskiness of the project in terms of the seismicity of the area. On the one hand, it is stated that the appropriate design of the boreholes is sufficient, while on the other hand, there is an increased likelihood of seismic events being caused by the drilling activity itself.Therefore, there is an obvious risk of seismicity, beyond what has been outlined above, even as induced or secondary seismicity. Moreover, increased seismicity is a significant environmental risk, which has been observed in many cases in the United States (a regular phenomenon in cases where water is injected into mining deposits using the fracking method), as well as in Norway, where many earthquakes have occurred in deposit sites used for CO2 storage.	
1.11 Air pollution Paragraph 2.6.1 of the EIA (p. 2-23) states that: *"According to data from the National Air Pollution Monitoring Network (ΕΔΠΑΡ) and the Annual Air Quality Report (2022), the nearest air pollution monitoring station* *is located in Kavala and, based on this, the concentrations of air pollutants in*	It should be noted that, according to the website of the Ministry of Environment and Energy and the measurement data of the National Air Pollution Monitoring Network (https://ypen.gov.gr/perivallon/poiotita-tis-atmosfairas/dedomena-metriseon-atmosfairikis-rypansis/), the nearest air pollution monitoring station in the project area is located in Kavala. In fact, this is the only station for which reliable data on air pollutant concentrations in the wider project area are available. Consequently, the Kavala station is the most reliable source of data

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The wider area of the project has low levels compared to the established limits. However, this station is out of operation for long periods of time, as reported from time to time by the Regional Unit of Kavala, which is responsible for its operation. Furthermore, the atmosphere in the wider area of Kavala is particularly polluted by sulphur and nitrogen oxides, as well as by suspended particles. There are even "white mountains" of radioactive phosphogypsum that have been illegally dumped since the 1960s in an area adjacent to the fertiliser factory in a former wetland (western end of the Nestos Delta), which has now been converted into an azotic area and, through the water table, is connected to the marine environment surrounding the fertiliser industry. Even the basic recommendation of the EEAE (Hellenic Atomic Energy Commission) to permanently cover the phosphogypsum with plant soil is not being followed.	for the quality of the atmospheric environment in the wider area of the project (and probably the only one) and was therefore correctly selected to provide data in the context of the EIA under consideration. Regarding the claims made by the author of the comment (about sources of air pollution in the project area), it should be noted that no reliable references or scientific literature have been found to confirm them. However, both the researchers and the project promoter are willing to examine and incorporate them into the project's EIA if relevant sources are indicated by the author of the comment or by the relevant licensing authority.
1.12 <u>Aquatic Environment</u> CO2 storage raises multiple environmental concerns in the aquatic environment (such as ocean acidification and eutrophication). In particular, any CO2 leakage will lead to acidification of the water with unpredictable consequences for the marine environment and, of course, for fisheries. Acidification leads to localised impoverishment of biodiversity. Only a few species survive in aquatic environments with high CO2 content. If fish breeding habitats are destroyed and food chains are disrupted, serious and irreparable damage to coastal and deep-sea fisheries would result. Furthermore, the effects of CO2 injection into saline aquifers are still visible at distances of around 100 kilometres and could therefore reach the mainland. As a result, the saline waters of the formations could also be pushed upwards and penetrate the underground aquifers containing fresh water, salinising them and rendering them unusable for human consumption. This risk is further exacerbated by the fact that Thasos is only a few kilometres away and much of its drinking water is pumped from boreholes. In light of the above points, the assessment of the project's impact on the marine environment, particularly within a Natural Area (with protected species, including fish), is clearly inadequate. Specifically, it is assumed that the process water will undergo the same treatment before being discharged (e.g. EIA, p. 967). In fact, the EIA considers it particularly "reassuring" that "Natural Radioactive Material (NORM)" will be the same as that currently discharged (and indeed within a protected	The possibility of CO_2 leakage with the potential for acidification of seawater has been thoroughly examined in the EIA for the project. More specifically, the potential impacts of seawater acidification have been examined: - As part of the assessment of the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters (Section '10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO THE RISKS OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'). The potential P&C from seawater acidification are examined for all P&C parameters in the study area (indicatively Sections 10.4.5.5 Impact on the Aquatic Environment, 10.4.5.8 Impact on the Biotic Environment, etc.). - As part of the Sensitivity, Exposure and Vulnerability to Climate Change analysis (Section '10.5 IMPACTS FROM EXPECTED CLIMATE RISKS'). It is also recommended that the company proceed with the specification of the CO2 leakage monitoring programme, in accordance with its obligations, in order to ensure that any leakage that may occur can be immediately detected and addressed. In addition, the potential P&K from the acidification of seawater are examined in detail in the Special Ecological Assessment Study (SEAS), which is an integral part of the project's EIA. This analysis, both in the context of the EIA and the SEA of the project, shows that no significant adverse effects are expected in the event of seawater acidification (an event that is extremely unlikely to occur and would have a limited spread if it did occur). Furthermore, under no circumstances are 'unpredictable consequences for the marine environment and, of course, for fishing' to be expected, as claimed by the author of this comment. The communication or lack thereof between deep hypersaline aquifers and shallower aquifers (potable or irrigable) depends on the geology of the area. The sediments of the Prinos basin are confined to its boundaries, in the marine area of the Gulf of Kavala, and do not extend into the subsoil with the shallow onshore aquifers for use. Furthermore, it is important to note that the aquifer targeted for CO_2 storage is subject to the acidic Prinos oil reservoir, at a depth of 3 kilometres. Therefore, if the logic of the argument in this comment were valid, the aquifers of Thasos would have to be contaminated with oil, hydrogen sulphide

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area) (EIA, p. 216). However, regardless of the fact that these impacts should be reassessed from scratch, there is no indication that the increase in volume and the extension of the disposal period will not cause further impacts and exceed the carrying capacity of the marine environment.	and carbon dioxide that has been present in the oil in the deposit for many years, which obviously has not happened and therefore cannot happen in the case of the proposed project either. The potential adverse effects on marine and terrestrial animal and plant organisms in the area, on habitats and on institutionally protected areas of ecological interest are examined in detail in Section "10.2.4 Impacts on the Natural Environment" of the EIA, as well as in the EIA included in Annex 17.1 of the EIA. More specifically, as the project is located within institutionally protected areas of ecological interest (Natura network areas), a "Special Ecological Assessment Study of the CO_2 Storage Unit in Prinos in SPA & SAC GR1150014, SPA GR1150001, SAC GR1150010 and SPA GR1150012 of the Natura 2000 Network" has been drawn up, which forms an integral and inseparable part of the EIA. The SEA analysis took into account all available bibliographic data for the Natura network areas in question, the long-term environmental monitoring data applied by ENERGEAN in the area, and extensive seasonal fieldwork has been carried out by a large multidisciplinary team, as described in the SEA itself. The conclusions of this study indicate that no significant impact is expected on the natural habitat of the study area, and even less so on the protected areas, their species classification and their ecological characteristics. However, it should be noted that in order to support his position, the author of the comment has used an excerpt from the EIA in a way that leads to a misleading conclusion. More specifically, on page 967 of the EIA, the text referred to in the comment reads as follows: "The water production wells on the Beta platform will be equipped with electric pumps, which will extract water from the reservoir. It is expected that the water produced from the storage project will undergo the same treatment as the current operation through oil separators on the Delta platform. The appropriately treated water will flow into the sea. However, the treatment required will be further investigated after water samples from the aquifer at the Storage complex have been taken and analysed. The addition of the above underlined section completely changes the meaning claimed by the author of the comment, namely that "it is assumed that the process water will undergo the same treatment before being discharged." With regard to water, the comment attempts to link the debris expected from the drilling of the borehole with the discharged water, a process that already exists and is already licensed for hydrocarbon extraction facilities. Naturally Occurring Radioactive Material (NORM) is present in the geological formations of Prinos in normal quantities. This material is found at background radiation levels and is included in the debris expected to be produced during drilling. As clearly stated in chapters 3.7, 6.4.9 and 10.2.8.1, these quantities are expected to be at the same levels as in previous drilling operations and will follow the same management practices, which have no connection with the water treatment that takes place on the platform and is then discharged on the basis of an appropriately licensed process .
2. Inadequacies of the risk assessment included in the EIA	
A review of the EIA shows that the risk assessment does not include the required information, as provided for in Phase 3 of Annex I. In particular:	The risk analysis for the CO_2 storage project in Prinos was based on a combined and multi-level approach, which includes both technical risks related to the individual infrastructures and the geological reservoir, and external risks from major accidents, natural disasters and climate change. The methodology is fully harmonised with the requirements of Directive 2009/31/EC, Joint Ministerial Decision 1915/2018, environmental licensing specifications, as well as internationally recognised technical practices in the industry, such as the Offshore Energies UK Decommissioning Guidance, or international standards, such as ISO 17776:2000. In summary, the approach includes:

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	• Investigation of the risk of leakage from the storage complex, with analysis of possible leakage routes, quantitative characteristics of events, critical parameters, and secondary effects. • Exposure assessment based on the characteristics of the natural and man-made environment above the storage field. • Assessment of impacts with reference to the sensitivity of biotic parameters and ecosystems. • Risk characterisation, including assessment of the safety and integrity of the project in the short and long term, as well as assessment of impacts in the event of a leak. For facilities and boreholes, the Qualitative Risk Assessment Method was applied based on the ISO 17776:2000 standard. Probability and severity are assessed on predefined qualitative scales (A–E and 1–5 respectively), leading to a grading of the overall risk and ultimately to residual risks. For risks related to the subsoil, a Bowtie analysis was applied, which also includes Semi-Quantitative Risk Assessment (SQRA). The leakage probability assessment was based on the failure rates of the available safety barriers, while the leakage rates and rates were estimated as a percentage of the total injected CO_2 quantity, in accordance with the guidelines of the UK Department of Energy and Climate Change (2012). In order to meet the requirements of Joint Ministerial Decision 1915/2018 and to assess the technological and physical risks associated with the project's vulnerability to serious accidents or disasters (e.g. CO_2 pipeline rupture, earthquakes, fires, floods), the results of the consequence modelling study, the seismicity study of the project study area and the wider area, and the project's vulnerability analysis to climate change in accordance with European Guideline 2021/C 373/01. The risk assessment was carried out separately for each functional part (facilities, boreholes, underground reservoir) and for all operational stages (normal operation, atypical or unplanned conditions, emergency situations). The final risk overview was derived from the synthesis of the individual results and specialised studies.
2.1 Drilling Risk Assessment On page 10-300 of Chapter 10, entitled "Drilling Risk Assessment" (paragraph 10.4.2.3 of the EIA), it is stated that *"17 boreholes have been abandoned...however, permeable layers have been identified beneath the bases of these internal barriers. Over time, the protective pipes could corrode and the sandstones could be exposed to CO2. This means that there is a risk of CO2 entering these permeable zones. A study is currently underway to confirm whether the evaporite sand layers are suitable as a secondary containment barrier and that they are not characterised as leakage pathways.* Therefore, since the outcome of the ongoing study is not known in advance, there is a de facto issue of insufficient data and a premature scheme: the completeness of the licensing dossier and the environmental impact study requires, above all, that it should not depend on studies that have not yet been completed.	The risks of leakage that may occur during the project's life cycle have been identified. Measures have also been developed to mitigate and minimise the risks to acceptable levels. These include the construction of new injection wells with corrosion-resistant metallurgy, the planned abandonment of old wells, and the implementation of a comprehensive monitoring, measurement and verification plan to identify and address any anomalies in real time. Through these preventive measures, the project ensures safe and effective CO_2 storage while maintaining the integrity of the reservoir. In addition, in accordance with EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a corrective measures system measures are an integral part of the CO_2 storage permit for the Prinos storage site and not of the EIA. Their prior approval by EDEYEP, following a relevant opinion from the competent EU climate directorate, is a prerequisite for the completion of the licensing process. The relevant studies, which have been prepared with the assistance of a reputable consultant with experience in CO2 storage issues, have been completed and submitted to EDEYEP In accordance with EU and national law, the monitoring programme is fully implemented both for all years of operation of the storage site and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take into account changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology.

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Furthermore, the same page states: *"Some wells on the Alpha and Beta platforms in Prinos will continue to produce from the layers of reservoir A during the injection of CO2 into reservoirs B and C. Being constructed from standard carbon steel grade metals, there is a risk of accelerated corrosion of these wells if they come into contact with CO2, which would cause integrity problems and possible leakage from the reservoir. However, reservoir modelling can simulate the movement of CO2.* The above statement calls into question the final conclusion of the study. Important note: It is not possible to drill for hydrocarbons and inject CO2 into the reservoir at the same time. Such an option exponentially increases the risk and is contrary to the rules for preparing an EIA. Paragraph 10.4.1.1.1, entitled "Possible Leakage Routes in CO2 Storage Projects CO2 Storage Projects" (p. 10-279) mentions possible leaks: • Through old boreholes: Old boreholes are exposed to high pressures and high concentrations of injected CO_2. • Through the overlying formation • Through faults and cracks • Through lateral migration 15 Of the 76 wells from the Prinos platform complex, 29 have acceptable barriers (low risk), 7 are out of structure, 28 are considered acceptable (medium risk) and 12 are considered non-acceptable (high risk). The construction of new injection wells could potentially cause a risk of leakage. During CO2 injection, there is a significant drop in temperature near the injection well, which could affect the construction of the wells, causing shrinkage and possible microcracks. Page 10-287 states that *"CO_2 injection sites, if not designed to safety standards, can pose risks to human health beyond leakage pathways and secondary containment issues".* The above list of potential leakage risks, which are essentially the most critical issue to be addressed by environmental impact studies and to which particular importance is attached by the rules of Directive 2009/31/EC (see above under I), is vague, ambiguous and therefore inadequate. In essence, it simply lists the potential scenarios and does not include any assessment of probability based on the characteristics of the project, nor does it indicate what technical measures (use of materials, decompression methods, etc.) will be taken to prevent or address them. In view of this, it is clear not only that inadequacy and shortcomings of the accompanying technical studies, but also the absence of	Furthermore, the precise definition of the methodology for treating the pumped water and the parameters for monitoring it do not constitute "risks" as claimed in the comment, but simple operating parameters of the project, which do not entail any additional risk. Finally, it should be noted that any risk identified will be included in the Monitoring Plan (which is not a means of addressing but a means of detecting potential risks), so that the actions of the relevant contingency plan can be activated (which, although not covered by this EIA, it will nevertheless be submitted and approved by the competent supervisory authority of the central administration at the appropriate stage of the project's maturity) which is applicable in the event of any unexpected technical issues arising, until they are fully resolved. Finally, with regard to the study to confirm whether the intermediate permeable layers of the evaporite series are suitable as a secondary containment reservoir, the study has been completed and does indeed confirm the storage capacity of the geological formation, now classifying the possibility of CO2 leakage to the surface as low. This study was also submitted to the responsible state agency (EDEYEP) as part of the "Application for CO2 Storage in the Prinos Reservoir." Furthermore, the paragraph stating "Furthermore, on the same page, it is stated: *"Some wells on the Alpha and Beta platforms in Prinos will continue to produce from the layers of reservoir A during the injection of CO2 into reservoirs B and C. Being constructed of standard carbon steel grade metals, there is a risk of accelerated corrosion of these wells if they come into contact with CO2, which will cause integrity problems and possible leakage from the reservoir.* However, *reservoir modelling can simulate the movement of CO2* . The above statement calls into question the final conclusion of the study. It continues with the following wording*: "* *However, modelling of the reservoir can simulate the movement of CO2 through its various layers and predict when the CO_2 plume will reach each well. Before this "CO2 wetting" occurs, the wells will be abandoned to avoid integrity issues. In addition, fluid sampling as part of the monitoring programme can confirm CO2 concentrations during oil production. This covers the question.*

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<tr><td>required technical experience of the operator, an element that must be examined independently during the project licensing process.

Specifically, pages 10-287 to 10-293 of paragraph 10.4.1.4 "Other factors hazardous to human health or the environment" present the risks and their categorisation:

Please carefully study the following tables, which are reproduced verbatim from the EIA. Go to the "risk" line, under "health impacts", locate the
"risk classification" and then evaluate the "mitigation measures" to understand the simplistic way in which risks are downplayed, while the "mitigation measures" refer more to wishful thinking and exhortations and less to actions accompanied by the necessary evidence. And, of course, note that nowhere is there any mention of residual risk (after the 16 mitigation measures) and its management (see comments and findings in the introduction to the Memorandum).</td><td></td></tr>
<tr><td>Induced Seismicity
<table><tr><td>Κίνδυνος</td><td>Η εισπίεση CO_2 στους γεωλογικούς σχηματισμούς μπορεί να αυξήσει την πίεση μέσα στους βραχώδεις σχηματισμούς, προκαλώντας ενδεχομένως σεισμικά συμβάντα.</td></tr><tr><td>Επιπτώσεις στην υγεία</td><td>Η επαγόμενη σεισμικότητα μπορεί να προκαλέσει ανακίνηση του εδάφους, που με τη σειρά της να οδηγήσει σε δομική ζημιά στις υφιστάμενες υποδομές. Αυτό ενδεχομένως να προκαλέσει τραυματισμούς ή θανάτους στην περίπτωση μερικής ή ολικής κατάρρευσης υποδομών, πτώσης αντικειμένων / μπαζών κλπ.</td></tr><tr><td>Ανάλυση κινδύνου</td><td>Ο χαρακτηρισμός του κινδύνου επαγόμενης σεισμικότητας από ανθρώπινες δραστηριότητες στον ταμιευτήρα Πρίνου περιλαμβάνει την αξιολόγηση γεωλογικών, λειτουργικών και περιβαλλοντικών παραμέτρων που καθορίζουν την πιθανότητα και την επίπτωση των σεισμικών συμβάντων.</td></tr><tr><td>Κατηγοριοποίηση κινδύνου</td><td>Με βάση την παραπάνω ανάλυση ο κίνδυνος επαγόμενης σεισμικότητας μπορεί ποιοτικά να χαρακτηρισθεί ως χαμηλός, σύμφωνα και με τα παρακάτω συμπεράσματα:</td></tr><tr><td>Γεωλογικές παράμετροι</td><td>Δεν υπάρχουν σημαντικά ρήγματα, παρατηρείται σταθερή λιθολογία και χαμηλή διαπερατότητα</td></tr><tr><td>Λειτουργικές παράμετροι</td><td>Χαμηλός ρυθμός εισπίεσης, μεγάλο βάθος εισπίεσης, σταθεροί ρυθμοί παραγωγής</td></tr><tr><td>Περιβαλλοντικές παράμετροι</td><td>Χωρίς ιστορική σεισμικότητα. χαμηλή σεισμικότητα υποβάθρου, απομακρυσμένη τοποθεσία με αραιό πληθυσμό</td></tr><tr><td>Μετριασμός</td><td>Συνεχής παρακολούθηση της σεισμικής δραστηριότητας, ελεγχόμενοι ρυθμοί εισπίεσης.</td></tr></table></td><td>The risk assessment studies that were carried out and submitted for evaluation to EDEYEP are in accordance with Annex I of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, European Parliament and Council Directives 200/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006", used internationally recognised methodologies based on best practices and in accordance with the above European directives.</td></tr>
<tr><td>Groundwater Pollution</td><td>The risk assessment studies carried out and submitted for evaluation to EDEYEP are in accordance with Annex I of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, European Parliament and Council Directives 200/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006", used internationally recognised methodologies based on best practices and in accordance with the above European directives.</td></tr>
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<table><tr><td>Κίνδυνος</td><td>Το CO_2 μπορεί να προκαλέσει αλλαγές στη χημική σύσταση των υπόγειων υδάτων με τη διάλυση ορυκτών από τα πετρώματα ή μέσω αντιδράσεων με ρύπους που υπάρχουν στους σχηματισμούς του τόπου αποθήκευσης</td></tr><tr><td>Επιπτώσεις στην υγεία</td><td>Τα ρυπασμένα υπόγεια ύδατα μπορούν να δημιουργήσουν σοβαρούς κινδύνους για την υγεία εάν χρησιμοποιούνται για πόση, άρδευση ή άλλους σκοπούς. Οι πιθανοί ρύποι περιλαμβάνουν βαρέα μέταλλα και άλλες τοξικές ουσίες που μπορούν να προκαλέσουν μια σειρά από προβλήματα υγείας, από γαστρεντερικά προβλήματα έως μακροχρόνιες ασθένειες.</td></tr><tr><td>Ανάλυση κινδύνου</td><td>Ο χαρακτηρισμός του κινδύνου ρύπανσης των υπόγειων υδάτων στον ταμιευτήρα Πρίνου περιλαμβάνει την αξιολόγηση γεωλογικών, λειτουργικών και περιβαλλοντικών παραμέτρων. Ο στόχος είναι να αξιολογηθούν οι πιθανές διαδρομές και η πιθανότητα μετανάστευσης CO_2 ή άλλων ρύπων στους υπόγειους υδάτινους πόρους.</td></tr><tr><td>Κατηγοριοποίηση κινδύνου</td><td>Με βάση την παραπάνω ανάλυση ο κίνδυνος ρύπανσης των υπογείων υδάτων στον τόπο αποθήκευσης μπορεί ποιοτικά να ταξινομηθεί ως χαμηλός, σύμφωνα και με τα παρακάτω συμπεράσματα:</td></tr><tr><td>Γεωλογικές παράμετροι</td><td>Υψηλής ποιότητας, μεγάλου πάχους, συνεχές υπερκείμενο πέτρωμα χαμηλής διαπερατότητας. Λίγα ρήγματα στην περιοχή</td></tr><tr><td>Λειτουργικές παράμετροι</td><td>Ελεγχόμενη πίεση και ρυθμός εισπίεσης. Λειτουργία συστημάτων παρακολούθησης (χωρίς να εξειδικεύονται)</td></tr><tr><td>Περιβαλλοντικές παράμετροι</td><td>Σημαντική απόσταση από υπόγειους υδάτινους πόρους. Χαμηλή υδραυλική συνδεσιμότητα με ζώνες γλυκού νερού. Σταθερές συνθήκες πίεσης στο θαλάσσιο περιβάλλον.</td></tr><tr><td>Μετριασμός</td><td>Μελέτες υφιστάμενης κατάστασης και παρακολούθηση των υπόγειων υδάτων.</td></tr></table>	
Equipment failure <table><tr><td>Κίνδυνος</td><td>Η υποδομή που απαιτείται για τη μεταφορά και εισπίεση CO_2, όπως αγωγοί, γεωτρήσεις και συμπιεστές, μπορεί να αστοχήσουν λόγω διάβρωσης, μηχανικών βλαβών ή λειτουργικών σφαλμάτων.</td></tr><tr><td>Επιπτώσεις στην υγεία</td><td>Οι αστοχίες μπορεί να οδηγήσουν σε διαρροή CO_2 στην επιφάνεια, η οποία μπορεί να προκαλέσει ασφυξία σε ανθρώπους και ζώα, καθώς υψηλές συγκεντρώσεις CO_2 μπορεί να εκτοπίσουν το οξυγόνο.</td></tr><tr><td>Ανάλυση κινδύνου</td><td>Ο χαρακτηρισμός του κινδύνου αστοχιών επιφανειακής υποδομής περιλαμβάνει την αξιολόγηση παραμέτρων που σχετίζονται με την ακεραιότητα και την αξιοπιστία της υποδομής, τις περιβαλλοντικές συνθήκες και τις πρακτικές λειτουργίας.</td></tr><tr><td>Κατηγοριοποίηση κινδύνου</td><td>Με βάση την παραπάνω ανάλυση ο κίνδυνος αστοχιών επιφανειακών υποδομών μπορεί ποιοτικά να ταξινομηθεί ως μέτριος, σύμφωνα και με τα παρακάτω συμπεράσματα, κυρίως λόγω του θαλάσσιου περιβάλλοντος και της παλαιότητας της υποδομής:</td></tr><tr><td>Ακεραιότητα υποδομής</td><td>Καλά συντηρημένη υποδομή, καλής ποιότητας υλικά, τακτική συντήρηση με περιστασιακά μικροπροβλήματα</td></tr><tr><td>Περιβαλλοντικές παράμετροι</td><td>Μέτριο δυναμικό διάβρωσης Σπάνιες και ήπιες καταιγίδες Χαμηλή σεισμική δραστηριότητα</td></tr><tr><td>Λειτουργικές παράμετροι</td><td>Λειτουργικές πρακτικές εντός ασφαλών ορίων Καθορισμένα σχέδια αντιμετώπισης καταστάσεων έκτακτης ανάγκης</td></tr><tr><td>Ανθρώπινοι παράγοντες</td><td>Επαρκώς εκπαιδευμένο προσωπικό Ισχυρή κουλτούρα ασφάλειας Αυστηρή συμμόρφωση με τη νομοθεσία</td></tr><tr><td>Μετριασμός</td><td>Τακτική συντήρηση Χρήση ανθεκτικών στη διάβρωση υλικών Εφαρμογή ισχυρών πρωτοκόλλων ασφαλείας</td></tr></table>	The risk assessment studies carried out and submitted for evaluation to EDEYEP are in accordance with Annex I of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, European Parliament and Council Directives 200/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006", used internationally recognised methodologies based on best practices and in accordance with the above European directives.

Responses to the supplementary memorandum of the Municipality of Thasos regarding the EIA for underground CO_2 storage in Prinos

Subject	Response
Impact on soil and vegetation **Κίνδυνος:** Η διαρροή CO_2 μπορεί να επηρεάσει τη χημεία του εδάφους και να διαταράξει την ανάπτυξη της βλάστησης αλλάζοντας τα επίπεδα pH και τη διαθεσιμότητα θρεπτικών ουσιών. **Επιπτώσεις στην υγεία:** Οι αλλαγές στο έδαφος και στη βλάστηση μπορούν να επηρεάσουν την τοπική γεωργία και την προσφορά τροφίμων, με επιπτώσεις στην ανθρώπινη υγεία μέσω της μειωμένης ποιότητας και διαθεσιμότητας των τροφίμων. **Ανάλυση κινδύνου:** Ο χαρακτηρισμός του κινδύνου των επιπτώσεων στο έδαφος και στη βλάστηση περιλαμβάνει την αξιολόγηση της πιθανότητας διαρροής CO_2 και των επιπτώσεών του στο θαλάσσιο περιβάλλον, που μπορεί να επηρεάσει έμμεσα τα κοντινά παράκτια οικοσυστήματα. Αν και οι άμεσες επιπτώσεις στο έδαφος και τη βλάστηση είναι λιγότερο σχετικές στις υπεράκτιες περιοχές, πρέπει να ληφθούν υπόψη οι ευρύτερες οικολογικές επιπτώσεις. **Κατηγοριοποίηση κινδύνου:** Με βάση την παραπάνω ανάλυση ο κίνδυνος επιπτώσεων στο έδαφος και τη βλάστηση μπορεί ποιοτικά να ταξινομηθεί **ως χαμηλός**, σύμφωνα και με τα παρακάτω συμπεράσματα: **Γεωλογικές παράμετροι:** Υψηλής ποιότητας υπερκείμενο πέτρωμα. Λίγα ρήγματα στην περιοχή Ευνοϊκές γεωχημικές συνθήκες **Λειτουργικές παράμετροι:** Ελεγχόμενες πρακτικές εισπίεσης. Λειτουργία συστημάτων παρακολούθησης Ακεραιότητα γεωτρήσεων **Περιβαλλοντικές παράμετροι:** Μικρή επίπτωση στο θαλάσσιο οικοσύστημα Σημαντική απόσταση από την ακτογραμμή. Σταθερές συνθήκες στο θαλάσσιο περιβάλλον. **Ανθρώπινοι παράγοντες:** Ολοκληρωμένα σχέδια αντιμετώπισης διαρροών CO_2 Αυστηρή συμμόρφωση με τη νομοθεσία Επαρκής συμμετοχή των ενδιαφερομένων **Μετριασμός:** Παρακολούθηση εδάφους και βλάστησης Ολοκληρωμένα σχέδια αντιμετώπισης διαρροών CO_2	The risk assessment studies carried out and submitted for evaluation to EDEYEP are in accordance with Annex I of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of [23] April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, European Parliament and Council Directives 200/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006", used internationally recognised methodologies based on best practices and in accordance with the above European directives.
Operational Accidents **Κινδυνος:** Αίτια όπως το ανθρώπινο λάθος, η αστοχία εξοπλισμού ή οι φυσικές καταστροφές μπορεί να προκαλέσουν ατυχήματα κατά την κατασκευή, λειτουργία και συντήρηση του τόπου αποθήκευσης CO_2. **Επιπτώσεις στην υγεία:** Τα ατυχήματα μπορεί να οδηγήσουν σε τραυματισμούς ή θανάτους εργαζομένων και γύρω κατοίκων. Η απελευθέρωση CO_2 ή άλλων επικίνδυνων ουσιών κατά τη διάρκεια ενός ατυχήματος μπορεί να δημιουργήσει άμεσους κινδύνους για την υγεία μέσω της εισπνοής ή της επαφής. **Ανάλυση κινδύνου:** Ο χαρακτηρισμός του κινδύνου λειτουργικών ατυχημάτων περιλαμβάνει την αξιολόγηση παραμέτρων που σχετίζονται με το σχεδιασμό και τη συντήρηση της υποδομής, τις λειτουργικές πρακτικές, τις περιβαλλοντικές συνθήκες και τους ανθρώπινους παράγοντες. **Ακεραιότητα υποδομής:** Δομικός σχεδιασμός και υλικά Τήρηση προτύπων σχεδιασμού και βέλτιστων πρακτικών. Χρήση υλικών που είναι ανθεκτικά στη διάβρωση, την πίεση και τις θαλάσσιες συνθήκες. Ελεγχος παλαιότητας και κατάστασης (φθοράς) της υποδομής. Συντήρηση και επιθεωρήσεις Τήρηση προγράμματος τακτικής συντήρησης Συχνές επιθεωρήσεις για τον εντοπισμό φθοράς, διάβρωσης και πιθανών αστοχιών. Πρωτόκολλα επισκευής: Αποτελεσματικές και έγκαιρες διαδικασίες επισκευής. **Λειτουργικές παράμετροι:** Λειτουργίες εισπίεσης και παραγωγής Πίεση και ρυθμός εισπίεσης εντός λειτουργικών ορίων. Τήρηση τυπικών λειτουργικών διαδικασιών (SOPs). Αξιοπιστία εξοπλισμού: Τακτικές δοκιμές και συντήρηση κρίσιμου εξοπλισμού.	The risk assessment studies carried out and submitted for evaluation to EDEYEP are in accordance with Annex I of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of [23] April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, European Parliament and Council Directives 200/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006", used internationally recognised methodologies based on best practices and in accordance with the above European directives.

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Subject	Response
<table><tr><td></td><td>Αντιμετώπιση καταστάσεων έκτακτης ανάγκης Σχέδια αντιμετώπισης έκτακτης ανάγκης για διάφορα σενάρια. Τακτική εκπαίδευση και ασκήσεις έκτακτης ανάγκης για το προσωπικό Διαθεσιμότητα και λειτουργικότητα εξοπλισμού ασφαλείας</td></tr><tr><td>Κατηγοριοποίηση κινδύνου</td><td>Με βάση την παραπάνω ανάλυση ο κίνδυνος λειτουργικών ατυχημάτων μπορεί ποιοτικά να ταξινομηθεί ως χαμηλός, σύμφωνα και με τα παρακάτω συμπεράσματα.</td></tr><tr><td>Ακεραιότητα υποδομής</td><td>Καλά συντηρημένη υποδομή με περιστασιακά μικροπροβλήματα, καλής ποιότητας υλικά</td></tr><tr><td>Λειτουργικές παράμετροι</td><td>Λειτουργικές πρακτικές εντός ασφαλών ορίων Καθορισμένα σχέδια αντιμετώπισης καταστάσεων έκτακτης ανάγκης Αξιόπιστος εξοπλισμός</td></tr><tr><td>Περιβαλλοντικές παράμετροι</td><td>Ηπιες και σταθερές θαλάσσιες συνθήκες Μέτριο δυναμικό διάβρωσης Χαμηλή σεισμική δραστηριότητα</td></tr><tr><td>Ανθρώπινοι παράγοντες</td><td>Επαρκώς εκπαιδευμένο προσωπικό Ισχυρή κουλτούρα ασφάλειας Αυστηρή συμμόρφωση με τη νομοθεσία</td></tr><tr><td>Μετριασμός</td><td>Εκπαίδευση για την ασφάλεια των εργαζομένων Σχεδιασμός αντιμετώπισης καταστάσεων έκτακτης ανάγκης και τακτικές ασκήσεις</td></tr></table>	
2.2 Risk assessment of the storage site (par. 10.4.2.4.1 of the EIA) Page 10-303 states: *"Five (5) potential leakage routes have been identified along which CO2 could escape vertically beyond the boundaries of the storage complex."* And on page 10-304 *"The Risk Assessment Table (Figure 10-23) shows that leakage route # L1 is the only subsurface leakage route of concern, relative to other potential subsurface leakage routes.... This means that the Monitoring Plan in relation to subsurface leakage risks should focus exclusively on monitoring and preparing corrective measures in case CO2 leaks into the Epsilon structure.* Therefore, addressing this specific risk of CO2 leakage is deferred to future monitoring. However, as mentioned above, a complete EIA cannot be based solely on assumptions and references to the future, especially when it comes to key issues that EU legislation places at the centre of the preventive and repressive control process for a geological storage project. The injection of carbon dioxide into the subsoil of land or sea for permanent storage is complex and may entail significant ongoing environmental and climate risks. In cases of leakage or uncontrolled subsea formations, if these are altered due to the deposition of huge amounts of CO2, the risks of leakage to the marine environment of Thasos and the wider area would be significant. Outflows of either CO2 or saline water from the subsea formations would cause acidification of marine waters with significant negative impacts on local biodiversity.	As mentioned repeatedly in this document, the EIA is supported by a series of technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) in the context of the "Application for CO2 Storage in the Prinos Reservoir". It presents in detail the possible leakage routes along which CO2 could escape vertically beyond the boundaries of the storage complex. The examination of this specific risk and the results assess the POSSIBLE underground leakage route #L1 as unexpected, and therefore the corresponding risk is described as low. However, it is the researcher's obligation, under the law, to identify all risks, regardless of whether they are significant or not, probable or improbable, to record and assess them based on their severity and probability, and to develop a Monitoring Plan and a contingency plan in accordance with best practices and the usual approach in all remediation projects (Although the contingency plan is not the subject of this EIA, at the appropriate stage of the project's maturity, it will be submitted to and approved by the competent supervisory authority of the central administration and will be applicable in the event of any unexpected technical issues arising, until they are fully resolved. In any case, for a more detailed presentation of the risk prevention/minimisation and response measures, please refer to the relevant Section '11.1 MEASURES FOR RISK PREVENTION AND MANAGEMENT' of the EIA.

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Subject	Response
2.3 Assessment and evaluation of environmental impacts (Chapter 10 of the EIA) For all cases of project impact assessment, both on the anthropogenic and natural environment and on protected areas (Natura 2000) that are assessed as 'moderate', the EIA consistently refers to preventive measures to reduce them to 'minor'. The following wording in the EIA is characteristic and repetitive: *"As these impacts are assessed as moderate in the Final Assessment, preventive/mitigation/countermeasures are proposed in this document so that these impacts are reduced to at least minor."* For example, the table on page 1-56. In paragraph 10.3 entitled *"Summary of the impacts from the normal/usual operation of the project"* in the table on page 10-253 and in the table on page 10-276 with the SEMPs (Significant Environmental Parameters) are characterised as high, the final impact assessment is characterised as moderate. However, following the implementation of the relevant measures proposed, ALL impacts are ultimately assessed as "Minor". The same applies as a rule to almost all parameters of the project. In Figures 10-16 (Summary presentation of impact assessment results for the operational phase) and 10-17 (Summary presentation of impact assessment results) for the decommissioning/deinstallation phase) on pages 10-276 and 10-278 of the EIA respectively, we observe that the geological, tectonic and soil characteristics, as well as water, are considered to have a minor to negligible impact in both Tables of the Figures, which leads to no mitigation measures being taken, let alone non-measures for managing the residual risk. In paragraph 10.4.1.4.3 entitled "Equipment Failure" and on page 10-290 (table), the risk of surface infrastructure failures is qualitatively classified as moderate, mainly due to the marine environment and the age of the infrastructure. Paragraph 10.4.2.2 entitled "Facility Risk Assessment" states (page 10-294): *"Partial or total rupture of the pipeline is a significant risk associated with the Project. Considering the high arrival pressures of bulk CO2 (102 barg) and CO2 cargoes (60-80 barg), overpressure due to equipment failure or operational errors must be prevented and mitigated to avoid consequences such as CO2 leakage, asphyxiation hazards, etc."*	The process described in this comment is a summary of the methodology used to prepare the EIA, as described in detail in Section 10.1 of the EIA. The assessment and evaluation of the potentially significant impacts of the proposed project were carried out based on the following steps: Step [1]: Identification and evaluation of the Significant Environmental Parameters (SEPs or Valued Receptors-VRs) of the natural and man-made environment of the study area. Step [2]: Assessment and evaluation of the Potential Significant Impacts from the normal activities of the construction and operation phases of the Project under consideration. The calculation of the significance of each impact is based on the Conesa method (Conesa, 2010), which was developed and adapted by the LDK study team so that, on the one hand, it aligns with international guidelines [3] [4], the relevant national and EU legislation, as well as internationally available best practices, and on the other hand, to respond to the best possible degree of functionality in accordance with the technical parameters of the project under study and the environmental characteristics of the study area. Based on this method, the assessment of the significance of the impact of a project or activity on an environmental parameter is derived from the assessment of the likelihood of the project/activity having an impact, in conjunction with specific variables, such as, among others the intensity of the intervention, the extent and duration of the resulting impact. The significance of the impacts is assessed on the basis of the qualitative result caused by each impact, which in turn is defined as the ratio by which the environmental impact is measured on the basis of the degree of intensity of the change produced and the characterisation of the impact. This characterisation is based on qualitative criteria such as intensity (IN), extent (EX), period of occurrence (MO), duration (PE), reversibility (RV), synergy (SI), accumulation (AC), type of effect (EF), periodicity (PR) and recovery (MC). The significance of the impact is quantified by assigning corresponding numerical values to the above evaluation criteria and a relative equation, which is derived from the weighting of the above criteria, is used. The quantified value of the significance of each impact is an absolute value (Im), which is the Impact Magnitude for calculating the quantified value of the significance of the impact. The Impact Magnitude is a quantified value of the significance of each impact and therefore indicates which of the potential impacts of the proposed project are relevant and potentially significant. The assignment of Im values has been standardised into categories, which are separated by specific numerical limits and constitute clearly defined classes for characterising the significance of impacts. One of the objectives of the EIA is to prevent adverse P&C impacts and, therefore, where it has assessed the potential impacts as moderate (and more severe), it proposes ways to mitigate the impacts in order to minimise the residual impacts. Residual impacts are those that remain after the implementation of preventive and/or corrective measures. If countermeasures/mitigation measures are proposed, the significance of the impacts is reassessed on the assumption that the proposed measures will eliminate or reduce their significance, so that the residual impacts are of minor or negligible significance. Therefore, in the context of the project's EIA, not all impacts are assessed as minor (e.g. during the construction phase, the impacts on the climate are assessed as moderate, on birdlife and marine fauna as moderate, etc.), but some of them (which were initially assessed

[3] International Finance Corporation (IFC). A Guide to Biodiversity for the Private Sector: The Social and Environmental Impact Assessment Process: https://www.ifc.org/wps/wcm/connect/9608497e-56e8-4074-bab6-45c61a36a4ad/ESIA.pdf?MOD=AJPERES&CVID=jkCYZ3G
[4] European Bank for Reconstruction and Development (EBRD). Guidance Note: EBRD Performance Requirement 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources: https://www.ebrd.com/downloads/about/sustainability/ESP_PR06_Eng.pd

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On page 10-295 it is stated: *"Corrosion of the pipeline due to impurities or environmental conditions, mechanical failure (material fatigue or welding defects) and accidental damage from external activities are the other main causes of CO2 leakage, which pose a major risk with consequences for both human health and the environment (soil and atmospheric pollution)."* While the tables on pages 10-296 and 10-297 recognise the above risks as real, page 10-297 proposes (of a general and theoretical nature in the form of reports of ideas) *"immediate mitigation actions that will include cleaning and repairing damaged pipes and/or equipment to reduce the impact on health and the environment, the review and updating of operating procedures, as well as frequent maintenance and inspection after the incident to prevent recurrence, backup equipment and emergency shutdown systems should be available. Finally, medical assistance should be provided to personnel to mitigate the effects of risks to human health,* and ultimately the risk is mitigated. Similarly, on page 10-301 and in paragraph 10.4.2.3.1.6 entitled "Drilling Risk Assessment" (p. 10-301, 10-302), serious risks such as *"CO2 / oil / water leakage through drilling in the formation layers - secondary storage containment, reduction of CO_2 storage capacity, etc.,"*, the implementation of the proposed risk mitigation control measures significantly reduces the risk to ALARP level, without however specifying whether the risk level is generally acceptable (very low risk) or at an acceptable level (if risk reduction is unfeasible). Following on from the above points, the EIA fails to identify synergistic effects with other projects: in fact, it emphatically states that similar "interactions" "do not exist" ... EIA, pp. 139, 254). These are claims that are refuted by the EIA itself. Apart from oil extraction (which, for a certain period of time, will coexist with storage, see EIA p. 415), increased ship traffic, adjacent natural gas storage (YAHA project) and the continued operation of the Sigma facilities are projects with obvious synergistic effects. Fishing and extensive aquaculture in the area are mentioned, but it is considered, quite arbitrarily, that they will escape the effects on the marine environment.	as moderate and above) become minor residual impacts after the implementation of the proposed measures, a process that is the main subject and responsibility of the EIA. However, the author of this comment confuses the above-mentioned impacts expected from the normal/regular activities of the construction and operation phases of the Project under consideration (Sections 10.2 and 10.3) with the potential impacts arising from the vulnerability of the Project under study to the risk of serious accidents or disasters. For the latter, the provisions of Section '10.4 IMPACTS ARISING FROM THE VULNERABILITY OF THE PROJECT TO RISKS OF MAJOR ACCIDENTS OR DISASTERS RELATED TO THE PROJECT'. With regard to synergistic effects, the degree of interaction of the project with others is analysed at three levels in Section 10.6 'ASSESSMENT OF CUMULATIVE/SYNERGISTIC EFFECTS'. In particular, it should be noted that synergy is one of the qualitative criteria included in the methodology for assessing environmental impacts, as analysed above. The interaction of the proposed project with others has been thoroughly examined in the context of assessing the potential impacts of the proposed project on each Environmental Parameter, as the Synergy (SI) parameter of the impact has been incorporated into the equation for calculating the quantified value of the significance of each potential impact (for details, refer to Section '10.1.2.2.1 Calculation of the Significance of Impacts').
2.4 Assessment of Potentially Significant Impacts from Normal/Usual Project Activities Page 2-47 (para. 2.7.3) states: *"the scenario of CO_2 leakage from the reservoir itself during the operation of the Project (the effects of which are mostly catastrophic),*	The excerpt quoted in this comment is misleading and does not accurately reflect the contents of the EIA. The excerpt selected refers to Chapter 2 of the Non-Technical Summary of the EIA, which summarises the main findings and conclusions of the EIA. The documentation for each conclusion of the EIA is provided in the relevant chapters of the EIA and not in the Non-Technical Summary. More specifically, the relevant excerpt is taken from Section 10.4.5.1, which states:

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is unlikely. As for a possible leak from the pipeline, this can be avoided by the planned inspection of a smart tool that measures the thickness of the pipeline wall (every 5 years or in other cases of system shutdown)..." As in the above references to the relevant point, the level of risk is highlighted, but the description of the occurrence of the risk as "unlikely" is not substantiated in the slightest.	"...Furthermore, according to data collected by Energean over a number of years, it has been proven that depleted hydrocarbon fields and related structures have proven storage capacity, a proven impermeable cap to prevent possible leakage of stored fluids, a defined volume of resources suitable for CO2 storage, and are tectonically stable areas. Furthermore, it should be noted that the Prinos basin is a tectonically stable area, as required for CO2 storage areas in terms of tectonic (seismic) activity. Therefore, the scenario of CO2 leakage from the reservoir itself during the operation of the Project (the effects of which are mostly catastrophic) is unlikely. As for a possible leak from the pipeline, this can be prevented by the planned inspection of a smart tool (pigging), which measures the thickness of the pipeline wall (every 5 years or in other cases of system shutdown) and with the planned monitoring system (Annex 16.2). In any case, the consequences depend on the quantity and duration of the leak...'. The description 'unlikely' is based on the analysis in Chapter 10.4 IMPACTS RESULTING FROM THE VULNERABILITY OF THE PROJECT TO THE RISK OF SERIOUS ACCIDENTS OR DISASTERS RELATED TO THE PROJECT, which, in addition to the data included in the EIA, relevant project risk analysis studies (e.g. Consequence modelling assessment for Prinos CCS facilities. WSP, July 2024) and the relevant risk analysis carried out within its framework, also presents the findings of the technical studies and simulations that were prepared and submitted to the competent state body (EDEYEP) as part of the "Application for CO2 Storage in the Prinos Reservoir". Finally, with regard to the project's claim that "the level of risk is highlighted", it should be noted that there is a risk associated with the project, as there is a risk associated with any project and infrastructure. The risk levels of this project have been examined in detail in Chapter 10.4 of the EIA and in the technical studies and simulations that were prepared and submitted to the competent state agency (EDEYEP) in the context of the "Application for CO2 Storage in the Prinos Reservoir," and in no scenario did the level of risk exceed the classification of low.
2.5 Measures for the Prevention of Significant Anomalies Paragraph 11.5.2 Measures for the Prevention of Significant Anomalies and the accompanying Table 11-4 refer to the project's facilities and boreholes as possible sources of CO_2 leakage from the storage site. This chapter is the most critical in the risk assessment of the project, as it describes the serious risks, possible impacts and preventive measures. Here, then, we see in all its glory the superficial approach to the assessment of major risks, the vagueness and generality of the proposed measures and, of course, once again, the complete lack of reference to residual risk and its management. To corroborate the above, Table 11-4 selectively lists 23 specific critical risks with potential impacts *"Large-scale CO2 escape (leakage) posing risks to human and animal safety (potential risk of asphyxiation), significant environmental pollution, high repair costs and operational disruption"* and proposed preventive measures. As you can see, a new column has been added to the table with comments on the preventive measures.	The risk assessment studies that were carried out and submitted for evaluation to the EDEYEP were conducted in accordance with Annex I of Joint Ministerial Decision 48416/2037/E.103/2011 (Government Gazette 2516/B/7.11.2011) "Measures and conditions for the storage of carbon dioxide in geological formations...−Amendment of Joint Ministerial Decision No. 29457/1511/2005 (B' 992), Presidential Decree 51/2007 (A' 54) and Presidential Decree 148/2009 (A 190), in compliance with the provisions of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the geological storage of carbon dioxide and amending Council Directive 85/337/EEC, European Parliament and Council Directives 200/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC of the European Parliament and of the Council and Regulation (EC) No 1013/2006", used internationally recognised methodologies based on best practices and in accordance with the above European directives. Furthermore, during the construction phase, the entire project will be developed in accordance with national and European standards as required by law. Internationally renowned firms not only check and certify compliance with the relevant standards during the construction phase and after completion, but also periodically throughout the entire period of operation of the project, as is also the case at the Prinos oil production facilities, which are over 40 years old. Further compliance checks are carried out by the competent authorities not only in the context of environmental licensing and storage permits, but also in the context of installation approval (construction stage) and operating permits (operational stage) as required by Greek law. The above concerns all the comments presented in the Tables.

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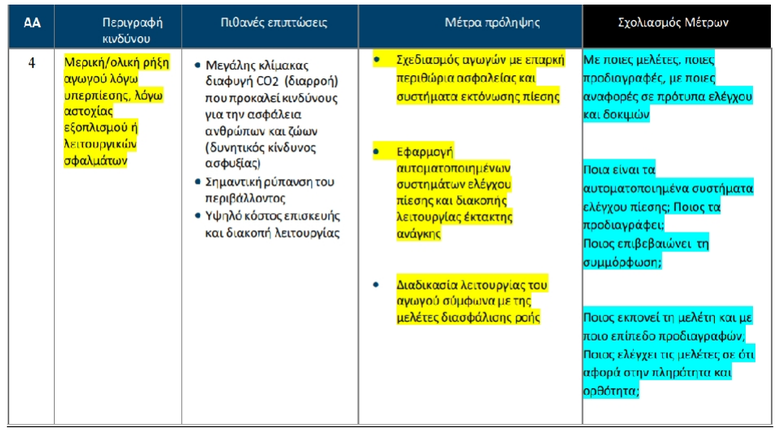
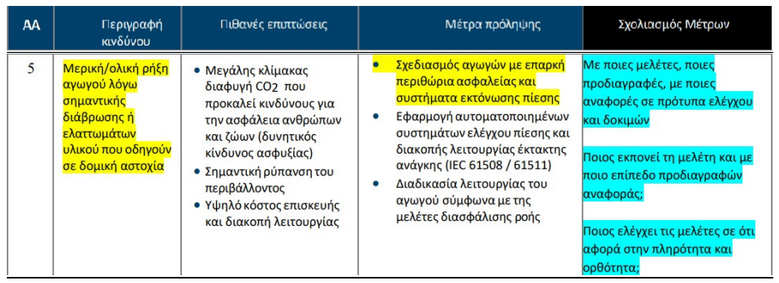
 ΑΑ / Περιγραφή κινδύνου / Πιθανές επιπτώσεις / Μέτρα πρόληψης / Σχολιασμός Μέτρων 4 — Μερική/ολική ρήξη αγωγού λόγω υπερπίεσης, λόγω αστοχίας εξοπλισμού ή λειτουργικών σφαλμάτων • Μεγάλης κλίμακας διαφυγή CO2 (διαρροή) που προκαλεί κινδύνους για την ασφάλεια ανθρώπων και ζώων (δυνητικός κίνδυνος ασφυξίας) • Σημαντική ρύπανση του περιβάλλοντος • Υψηλό κόστος επισκευής και διακοπή λειτουργίας • Σχεδιασμός αγωγών με επαρκή περιθώρια ασφαλείας και συστήματα εκτόνωσης πίεσης • Εφαρμογή αυτοματοποιημένων συστημάτων ελέγχου πίεσης και διακοπής λειτουργίας έκτακτης ανάγκης • Διαδικασία λειτουργίας του αγωγού σύμφωνα με τις μελέτες διασφάλισης ροής Με ποιες μελέτες, ποιες προδιαγραφές, με ποιες αναφορές σε πρότυπα ελέγχου και δοκιμών Ποια είναι τα αυτοματοποιημένα συστήματα ελέγχου πίεσης; Ποιος τα προδιαγράφει; Ποιος επιβεβαιώνει τη συμμόρφωση; Ποιος εκπονεί τη μελέτη και με ποιο επίπεδο προδιαγραφών; Ποιος ελέγχει τις μελέτες σε ότι αφορά στην πληρότητα και ορθότητα;	The key to reducing risk in any project is strict compliance with and implementation of international design standards recognised by the European Union, as well as the corresponding construction codes, standards and guidelines. The project will be designed and will comply with all best practices relating to operational safety systems, approved operating procedures, emergency shutdown systems, maintenance programmes and regular inspections, which will be closely monitored by both the competent national authorities and independent third parties. • Damage Protection: The pipeline will be laid underground (buried) to reduce the risk of damage from fishing activities and marine activities in general in the local area. • Corrosion Protection: In line with international best practice, strict restrictions will be imposed on the composition of CO_2 entering the facilities. Prior to delivery, the CO_2 will be continuously analysed using high-sensitivity spectrometers or similar equipment. If concentrations of components exceeding the limits specified in the project specifications are detected, the stream will be rejected and will not be accepted by the company, therefore it will not enter the system and will not be injected through the boreholes into the system. The above procedures for checking the quality and purity of a fluid and not accepting it if it does not meet the specifications have been applied in the chemical industry for many decades. In addition, regular checks of the pipeline wall thickness will be carried out using ultrasonic (UT) or magnetic flux leakage (MFL) tools, in accordance with industry standards, as is currently the case at the Prinos facility and other Energean facilities. The company has significant experience in these matters. • Pressure and Temperature Management: • An extensive system of meters, sensors and analysers will continuously monitor operating conditions to detect any anomalies. Automatic shutdown systems will be in place, in line with current international and European safety standards. Typically, these systems will include emergency shutdown valves (ESDVs), leak detection technologies such as Distributed Temperature Sensing (DTS) with optical fibres, and flange guard systems. The design of the pipeline and related systems will be carried out in accordance with standards such as DNV-ST-F101, API 1111 and ISO 27913:2023 (for CO_2 transport).
 ΑΑ / Περιγραφή κινδύνου / Πιθανές επιπτώσεις / Μέτρα πρόληψης / Σχολιασμός Μέτρων 5 — Μερική/ολική ρήξη αγωγού λόγω σημαντικής διάβρωσης ή ελαττωμάτων υλικού που οδηγούν σε δομική αστοχία • Μεγάλης κλίμακας διαφυγή CO_2 που προκαλεί κινδύνους για την ασφάλεια ανθρώπων και ζώων (δυνητικός κίνδυνος ασφυξίας) • Σημαντική ρύπανση του περιβάλλοντος • Υψηλό κόστος επισκευής και διακοπή λειτουργίας • Σχεδιασμός αγωγών με επαρκή περιθώρια ασφαλείας και συστήματα εκτόνωσης πίεσης • Εφαρμογή αυτοματοποιημένων συστημάτων ελέγχου πίεσης και διακοπής λειτουργίας έκτακτης ανάγκης (IEC 61508 / 61511) • Διαδικασία λειτουργίας του αγωγού σύμφωνα με τις μελέτες διασφάλισης ροής Με ποιες μελέτες, ποιες προδιαγραφές, με ποιες αναφορές σε πρότυπα ελέγχου και δοκιμών Ποιος εκπονεί τη μελέτη και με ποιο επίπεδο προδιαγραφών αναφοράς; Ποιος ελέγχει τις μελέτες σε ότι αφορά στην πληρότητα και ορθότητα;	Please see the answer to the previous question
 ΑΑ / Περιγραφή κινδύνου / Πιθανές επιπτώσεις / Μέτρα πρόληψης / Σχολιασμός Μέτρων	The question has been answered in the document: "Consultation Report on the EIA of the Project" as follows: *"... In accordance with EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a system of corrective measures are an integral part of the CO_2 storage permit for the Prinos storage site.*

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1 | Κακή κατάσταση εγκαταλελειμμένων γεωτρήσεων. Μετά από ανάλυση της ακεραιότητας των γεωτρήσεων, 12 κρίθηκαν ακατάλληλες με βάση την κατάσταση της «ως εγκαταλείφθηκαν» | Διαρροή CO2 / πετρελαίου / νερού μέσω γεωτρήσεων στα στρώματα των σχηματισμών ή στην επιφάνεια | • Παρεμβατική γεώτρηση για τοποθέτηση βαθύτερου φραγμού κατά μήκος κατάλληλων σχηματισμών • Παρακολούθηση γεωτρήσεων με αισθητήρες οπτικών ινών DTS (distributed temperature sensing) και DAS (distributed acoustic sensing) | Πότε γίνεται και με ποιες προδιαγραφές; Ποια είναι η έκταση και το περιεχόμενο του συστήματος; Ποιος το προδιαγράφει και ποιος ελέγχει την πληρότητα και ορθότητα του σχεδιασμού	*and their prior approval by EDEYEP and the competent EU climate directorate is a prerequisite for the completion of the licensing process, which is fully covered by a study conducted by an international firm with experience in the relevant field. In accordance with EU and national law, the monitoring programme is fully implemented both during the entire period of operation of the storage facility and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take into account changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology*. The company that carried out the final study of the monitoring system design and the corrective measures study is Elemental. This study was based on and used data and results from a previous study conducted by Halliburton on the initial assessment of the monitoring system. Elemetal Energies is a specialist consulting firm in the field of drilling engineering and energy transition, with a global track record of over 2,000 drilling projects. The company provides specialised services throughout the entire drilling life cycle, including design, integrity management, execution, monitoring and abandonment. Supporting the oil and gas, CCS and geothermal sectors, Elemental combines deep technical expertise with operational experience to deliver safe, effective solutions. As an independent and technology-neutral partner, it works in a variety of environments – from deepwater drilling and HPHT wells to remote onshore projects. Recent acquisitions of Senergy Wells, Norwell Engineering and Well Expertise AS have significantly expanded its capabilities and international presence, establishing Elemental as one of the largest consulting companies in the world. The company is playing an active role in the energy transition, helping operators adapt their infrastructure and operations for a low-carbon future. Halliburton is a globally recognised company that can provide high-level technical and scientific services in the field of hydrocarbon and other raw material production, as well as in projects related to the green transition, geothermal projects, carbon dioxide storage, hydrogen, etc. Halliburton is one of the leading companies in this field, as it is one of the 3-4 largest companies in the world with relevant experience. Halliburton's collaboration with Energean and EnEarth is long-standing and very constructive, offering an admittedly excellent result, as recognised by EDEYEP and DGClima.
ΑΑ | Περιγραφή κινδύνου | Πιθανές επιπτώσεις | Μέτρα πρόληψης | Σχολιασμός Μέτρων 4 | Εγκαταλελειμμένες μη προσβάσιμες γεωτρήσεις παλαιού τύπου – Έχουν εγκαταλειφθεί 17 γεωτρήσεις όπου η βάση του εσωτερικού φραγμού της είναι τοποθετημένη εντός της εβαποριτικής ακολουθίας και συνεπώς η γεώτρηση έχει εγκαταλειφθεί σε βάθη μη διαπερατών σχηματισμών. Ωστόσο, ... και οι ψαμμίτες να εκτεθούν στο CO2. | Διαρροή CO2 / πετρελαίου / νερού μέσω γεωτρήσεων στα στρώματα των σχηματισμών – δευτερεύουσα αποθήκη συγκράτησης | Μελέτη για να επιβεβαιωθεί εάν τα στρώματα της εβαποριτικής άμμου είναι κατάλληλα ως δευτερεύουσα αποθήκη συγκράτησης και ότι δεν χαρακτηρίζονται ως διαδρομές διαρροής. | Πότε εκπονείται η μελέτη και από ποιον ελέγχεται;	The company's technical team conducted a subsoil simulation study using three-dimensional dynamic imaging models. These models included the overlying geological formations of the reservoir and assessed their ability to act as secondary storage layers. The study has been completed and confirms the storage capacity of the geological formation, classifying the possibility of CO2 leakage to the surface as low. This study has been submitted to the responsible state agency (EDEYEP) as part of the "Application for CO2 Storage in the Prinos Deposit".

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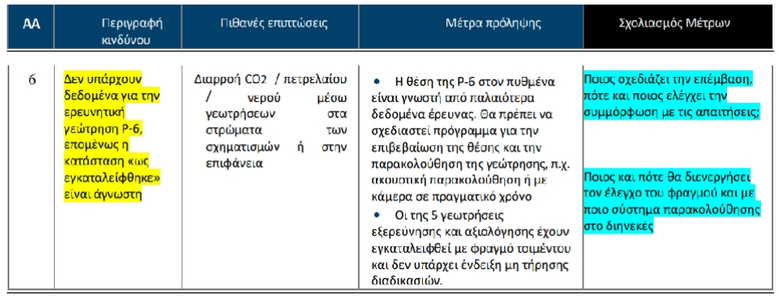
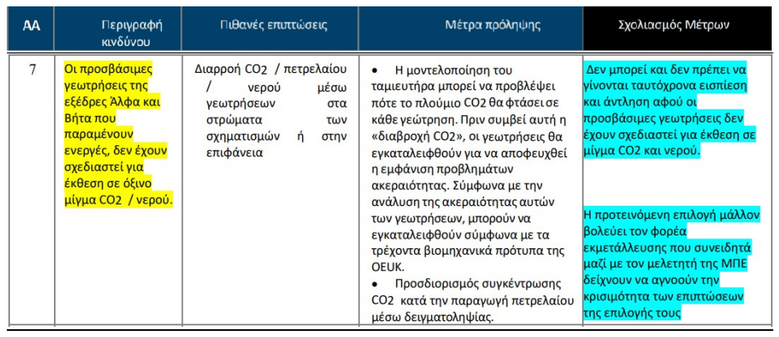
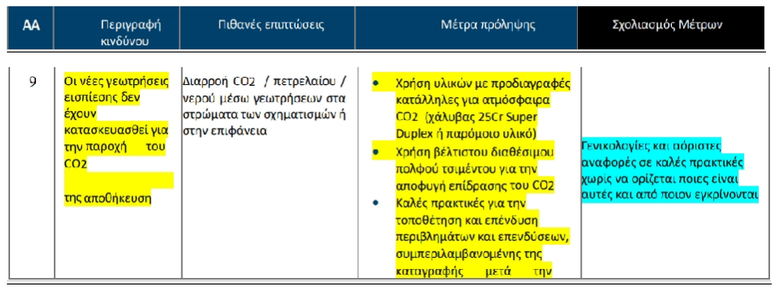
	With regard to the intervention and abandonment of the wells, the same practice is followed as for the construction of the wells, following the same guidelines. That is: There are two independent verification bodies that review and approve the design and execution of the abandonment (P&A). These are the Greek regulatory authority (EDEYP) and an independent well examiner. Both confirm that the abandonment design complies with the OEUK Well Abandonment and Decommissioning Guidelines (Issue 7), which are aligned with ISO16530-1 Well integrity – Part 1: Life-cycle governance) and incorporate recognised industry best practices. In addition to reviewing the design, both bodies will supervise the abandonment to ensure that all P&A work, barrier placements and cement installations comply with the accuracy of the approved design. With regard to the performance of barrier checks, the question has been answered in the document: "Consultation Report on the EIA of the Project" as follows: *"... In accordance with EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a system of corrective measures are an integral part of the CO2 storage permit for the Prinos storage site, and their prior approval by EDEYEP and the competent EU climate directorate is a prerequisite for the completion of the licensing process, which is fully covered by a study conducted by an international firm with experience in the relevant field. In accordance with EU and national law, the monitoring programme is fully implemented both during the entire period of operation of the storage site and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take into account changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology.*
	The answer is given on page 10-300 (10.4.2.3.1.4) of Chapter 10 of the EIA.
	There are two independent bodies that review and approve the drilling design to ensure that it complies with established standards. These bodies – EDEYEP and the independent drilling examiner (IVB) – confirm that the design has been developed in accordance with OEUK guidelines, which are based on ISO 16530-1 (Well Integrity – Part 1: Life cycle governance), as well as industry best practice. In addition to confirming the initial design, both bodies will monitor the construction of the well and verify that it is being carried out in accordance with the approved specifications of the initial design.

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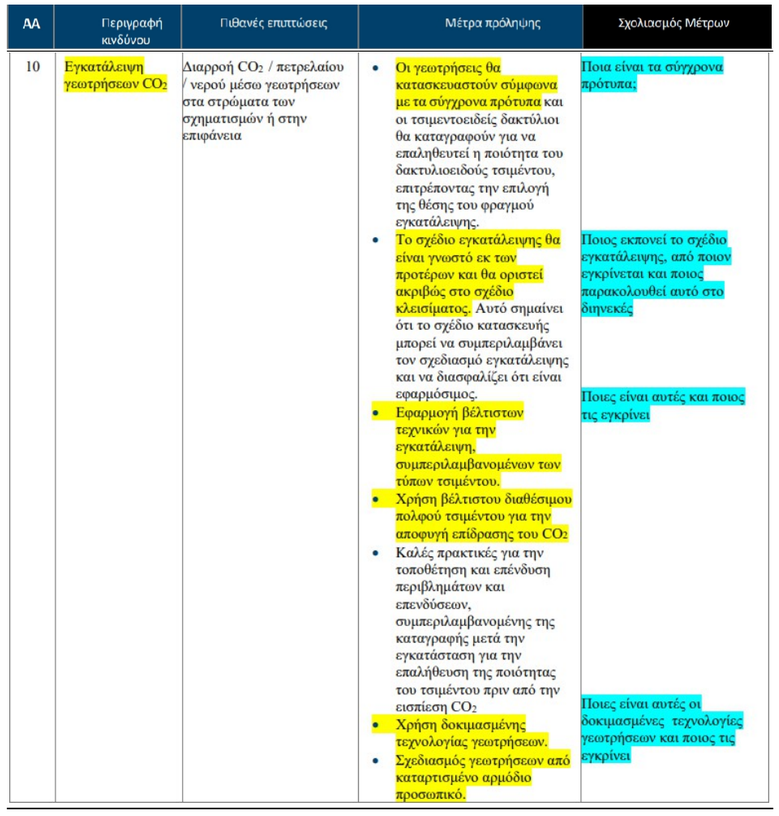	The same practice is followed for the abandonment of wells as for their construction, following the same guidelines. That is: There are two independent verification bodies that review and approve the design and execution of the abandonment (P&A). These are the Greek regulatory authority (EDEYEP) and an independent well examiner. Both confirm that the abandonment design complies with the OEUK Well Decommissioning and Abandonment Guidelines (Issue 7), which are aligned with the ISO16530-1 Well integrity – Part 1: Life-cycle governance standard) and incorporate recognised industry best practices. In addition to reviewing the plan, both bodies will supervise the abandonment to ensure that all P&A work, barrier placements and cement installations comply with the accuracy of the approved design.
Paragraph 5.2.4.9 of the EIA (p. 5-33) refers to the Sevezo Directive. *The proposed project is not directly related to this Directive. However, the project is indirectly related to the Directive, as the onshore part is located within the Sigma unit, which complies with all the commitments and specifications arising from the Seveso II Directive."* However, the researchers studying the CO_2 storage project in Prinos should be aware that commitments to comply with the Seveso Directive in the area do exist. It is well known that accidents in both industries (fertiliser and Kavala OIL) have become more frequent in recent years and will become even more frequent as time goes by, due to the age of the facilities. 26 In the EIA, apart from the reference to the Seveso Directive for Sigma's facilities, there is no mention of the risk that requires the drafting of SATAME plans, which mainly consists of ammonia leaks from the fertiliser plant and hydrogen sulphide leaks from the Energean facilities. And it does not	*The carbon dioxide storage project is not subject to Joint Ministerial Decision 172058/2016, which transposes Directive 2012/18/EU (known as Seveso III) into Greek law, as carbon dioxide is not included in the tables of dangerous substances in the Joint Ministerial Decision.*

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There are absolutely no preparations for the provisions of the SATAME, which were only approved in September 2021 (public information, preparedness exercises, escape plans, etc.) in the event of a major technological accident.	
2.6 Cessation of operations – Decommissioning, Chapter 13.6.6 On page 13-23, it is noted that, *"8. Geological surveys of the reservoir layers will be conducted to identify potential leakage pathways or geological hazards and minimise the risk of CO2 leakage into the marine environment, and drilling monitoring parameters such as pressure, temperature and composition will be monitored to ensure safety against leaks."* These general (once again) references to conducting geological surveys cannot constitute documentation for addressing the risks that will be monitored indefinitely. Nowhere is there any mention of who will conduct them, how often, who will evaluate the results, and what the resulting mitigation measures will be.	The current phase is designed to meet the regulatory requirements set out in Directive 2009/31/EC of the European Parliament and of the Council on CCS Article 17, and to facilitate the final "Transfer of Responsibility" for the storage site to the Competent Authority. The plan has been drawn up with reference to Guidance Document 3: Criteria for the Transfer of Responsibility to the Competent Authority. Article 17 2. After the closure of a storage site in accordance with points (a) or (b) of paragraph 1, the operator shall remain responsible for monitoring, reporting and corrective measures, in accordance with the requirements set out in this Directive, and for all obligations relating to the surrender of allowances in the event of leakage in accordance with Directive 2003/87/EC and preventive and corrective actions in accordance with Articles 5 to 8 of Directive 2004/35/EC, until the responsibility for the storage site is transferred to the competent authority in accordance with Article 18(1) to (5) of this Directive. The operator shall also be responsible for sealing the storage site and removing the injection facilities. 3. The obligations referred to in paragraph 2 shall be fulfilled on the basis of a post-closure plan drawn up by the operator on the basis of best practice and in accordance with the requirements set out in Annex II. A provisional after-closure plan shall be submitted to and approved by the competent authority in accordance with Article 7(8) and Article 9(7). Before the closure of a storage site in accordance with points (a) or (b) of paragraph 1 of this Article, the provisional post-closure plan shall: (a) be updated as necessary, taking into account risk analysis, best practices and technological improvements; (b) be submitted to the competent authority for approval; and (c) be approved by the competent authority as the definitive post-closure plan. 4. After the closure of a storage site in accordance with paragraph 1(c), the competent authority shall be responsible for monitoring and corrective measures in accordance with the requirements laid down in this Directive and for all obligations relating to the surrender of allowances in the event of leakage in accordance with Directive 2003/87/EC and for preventive and corrective measures in accordance with Articles 5(1) and 6(1) of Directive 2004/35/EC.
2.7 Monitoring Paragraph 13.6.7 of the EIA (p. 13-28) states: *'Quality characteristics of treated water from pumping wells prior to its discharge into the marine environment. The parameters to be monitored will be determined on the basis of the characteristics of the water to be pumped from the reservoir. The pumped water is expected to have a higher salinity than seawater and may be contaminated with oil. In addition to the parameters to be determined, the temperature of the treated water shall be monitored before it is discharged into the sea."* The above risks are real, as recognised in the EIA, and cannot be addressed by summarising the findings of the PMP (Programme	Programmes and Monitoring Plans are available and are already being effectively implemented in countries that have incorporated this specific know-how into their planning and are constantly evolving within the EU framework. In accordance with EU (Article 9 of Directive 2009/31/EC) and national (Article 10 of the relevant Joint Ministerial Decision) law, the design and implementation of a monitoring system and a system of corrective measures are an integral part of the CO2 storage permit for the Prinos storage site, and their prior approval by EDEYEP and the competent EU climate directorate is a prerequisite for the completion of the licensing process, which is fully covered by a study conducted by an international firm with experience in the relevant field. In accordance with EU and national law, the monitoring programme is fully implemented both during the entire period of operation of the storage site and for a number of years after its closure, when its integrity is fully confirmed. In addition, the monitoring programme must be updated every five years to take into account changes in the estimated risks to the environment and health, new scientific knowledge and improvements in the best available technology. In addition, the precise definition of the methodology for treating the pumped water and the

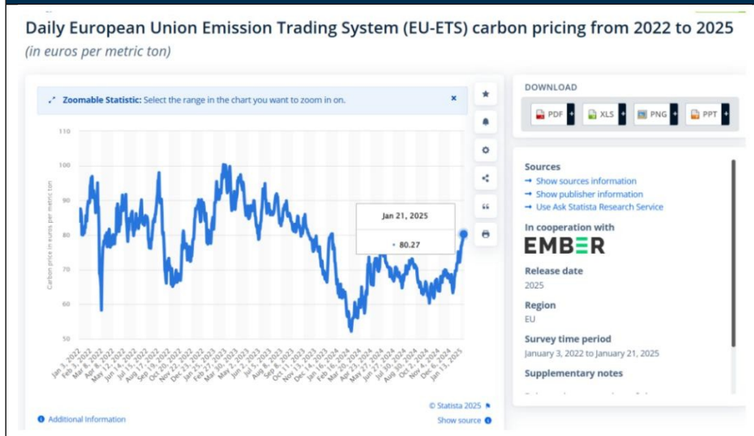
Responses to the supplementary memorandum of the Municipality of Thasos regarding the EIA for underground CO_2 storage in Prinos

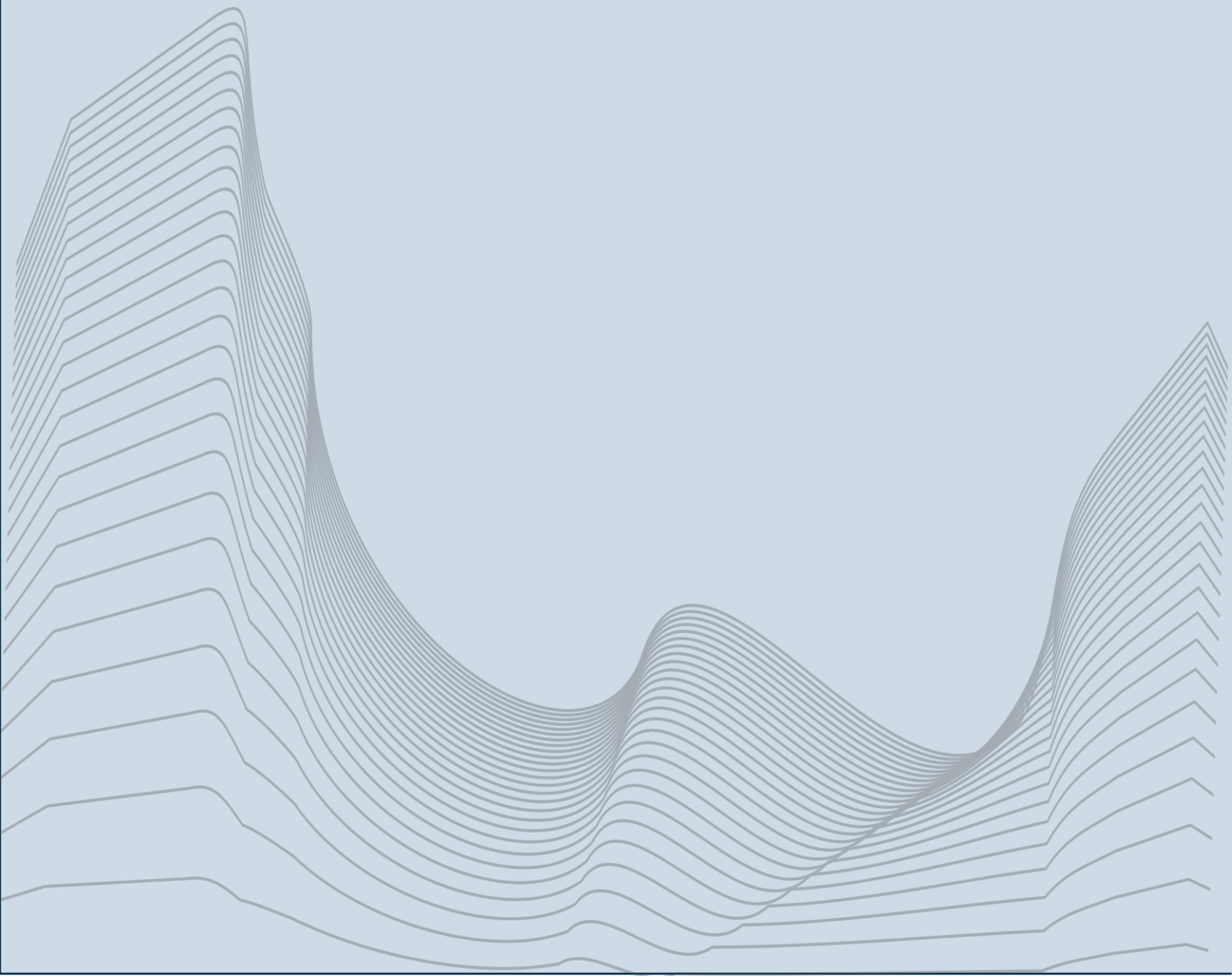
Subject	Response
Environmental Monitoring) during the construction and operation of the proposed project in a relevant Annual Report	monitoring parameters do not constitute "risks" as claimed in the comment, but are simply project operating parameters that do not pose any additional risk. Finally, it should be noted that any risk identified will be included in the Monitoring Plan (which is not a means of addressing but rather of detecting potential risks), so that the actions of the relevant contingency plan (which, although not covered by this EIA, it will nevertheless be submitted and approved by the competent supervisory authority of the central administration at the appropriate stage of the project's maturity) which is applicable in the event of any unexpected technical issues arising, until they are fully resolved.
3. Supervision of the Operating Body	
The existence of a body to supervise the operating company is absolutely necessary, mainly due to the complexity, intricacy and criticality of the project. However, there is no reference to, nor is there any provision for, the definition of requirements/specifications with which the project's Monitoring and Supervision Management Body must comply (form, organisation, staffing, supervisory authority, etc.), both during the design and construction period (Phase I & Phase II) of the onshore and offshore facilities and during the underground storage operation period. Reasonable questions also arise as to when it will be established and by which supervisory authority it will be supervised. Furthermore, in order to confirm compliance with the technical specifications, no reference is made to: - Who checks and approves the final/implementation studies for the construction - Who carries out compliance checks with the requirements of the studies, standards and specifications both during construction and during operation - the procedure for accepting field changes during construction - who approves the construction methodologies, - Who approves the construction materials and equipment and confirms compliance - What specifications and standards are used to perform laboratory and other tests during the erection of structures, both onshore and offshore, as well as during the manufacturing (manufacturing) of components and assemblies (shop inspection and acceptance tests) that are incorporated into the construction. - What is the maintenance programme for the facilities (analysis of actions for scheduled maintenance and faults) - What are the instrumental means of measurement (measuring stations, calibrations, etc.) for monitoring the behaviour of geological formations in fractured formations, CO_2 leaks. - What methodology is used and by which body to monitor the behaviour of the reservoir over many millennia to come?	For all the issues raised, answers are provided on the basis of current European and national legislation, and specifically in accordance with the provisions of Directive 2009/31/EC, Joint Ministerial Decision 48416/2037/2011 (as amended), Law 4920/2022 and Article 173 of Law 4964/2022. The competent authority for the supervision of CO_2 storage is EDEYEP, to which the relevant powers for the licensing and supervision storage sites. The selection of EDEYEP is based on its technical competence, its experience in the field of underground formations (such as hydrocarbon exploitation) and its suitably trained scientific and technical staff. Pursuant to Article 173 of Law 4964/2022, EDEYEP is the competent authority for assessing CO_2 storage licensing applications. It has already assessed the application submitted by EnEarth, accompanied by the required studies, in accordance with the provisions of the aforementioned legislation. The construction and development of the project is also subject to the general national institutional framework for the execution of technical projects, both during the design and construction phase and during the operational phase. Specifically, the construction of the project begins with the issuance of the Installation Approval, which includes the approval of the relevant technical studies and provides for the technical supervision of the construction by a competent supervising engineer, in accordance with the applicable provisions on technical works. Upon completion of the construction phase, the project will receive an Operating Permit, as provided for by current legislation. This permit will include specific conditions relating to the safe operation of the facility, as well as the periodic certification of its equipment. The Environmental Impact Study (EIS) concerns exclusively the environmental assessment of the project's impact during both its construction and operation. Environmental licensing is independent of the administrative licensing of the storage activity, which follows the procedure provided for in the relevant specific legislation (Joint Ministerial Decision 48416/2037/2011 and Law 4920/2022). At the same time, the construction and operation of the facility as an industrial facility is subject to the applicable specific institutional framework governing such facilities in Greece.

Responses to the supplementary memorandum of the Municipality of Thasos regarding the EIA for underground CO_2 storage in Prinos

Subject	Response
Collection and purification of CO_2 emissions from the country's major polluters.	
Three (3) major CO_2 emission capture projects are currently in full swing: the first by the Titan Group in Kamari, Boeotia (IFESTOS programme), the second by the Heracles Group in Milaki, Euboea (OLYMPUS programme), and the third by Motor Oil in Agioi Theodoroi (IRIS programme), while Helleniq Energy is preparing a programme similar to IRIS for its refinery in Elefsina. All three of the above programmes, with a total annual capacity of 3.5 to 4 million tonnes of CO2/year, use CO2 alkaline adsorption technologies. Collectively, these three programmes have secured funding from the European Union's Innovation Fund (EU Innovation Fund) totalling around €500 million. The above quantities of major pollutants, upon completion of their investments, will collect, will clean and temporarily store CO2 will exceed 8.5 million tonnes per year, while the annual storage capacity in Prinos will not exceed one million tonnes of CO2. It therefore appears that the annual quantities of CO_2 that can be stored in Prinos will only serve 1/8 of the quantities of CO_2 that will be produced annually by at least the country's major polluters. This will force the competent national body (DESFA) to immediately search for new CO2 storage sites internationally.	This comment is incorrect. (1) Carbon dioxide is not a pollutant but a greenhouse gas, just like water vapour, i.e. clouds. Greenhouse gases absorb and re-emit infrared radiation, trapping heat in the Earth's atmosphere. In this way, CO_2 contributes to the greenhouse effect and, by extension, to climate change. (2) The quantities emitted by the Titan units in Kamari, Boeotia, Heracles in Mylaki, MotorOil in Agioi Theodoroi and HelleniqEnergy for the Elefsina refinery are as follows HELLENIC PETROLEUM S.A. ELEFSINA REFINERY: 2,099 TITAN KAMARI, BOEOTIA PLANT: 1,186 AGET - MYLAKI PLANT: 0.807 MOTOR OIL (HELLAS) - CORINTH REFINERIES S.A.: 2.087 This adds up to a total of 6.1 million tonnes and not 8.5 million tonnes as stated in the document. The above data are taken from the European Union's database on emissions trading and relate to confirmed emissions for 2024. Prinos has a plan to increase its injection capacity to approximately 3 million tonnes, so it can serve 50% of the emissions of the above industry and not 1/8 as incorrectly stated in the document. Furthermore, the carbon dioxide storage facility in Prinos can also store 100% of the carbon dioxide emissions of the neighbouring fertiliser industry (Kavala Solutions, formerly VFL). (3) DESFA is not the competent national authority.
Fluctuation in CO_2 emission allowance prices on the European Emissions Trading System	
The problem faced by such projects across Europe is linked to the strong fluctuation in CO_2 emission allowance prices on the European Emissions Trading System (ETS) (see the relevant chart below).	The problem of fluctuating emission allowance costs is addressed with appropriate support tools, as is the case in other European countries. This issue does not concern the EIA.

Responses to the supplementary memorandum of the Municipality of Thasos regarding the EIA for underground CO_2 storage in Prinos

Issue	Response
 In practice, this means that no one can predict with any degree of certainty what the trend will be in the coming years, which will require 'operational support' for the operator so that if, for some reason, emission allowance prices collapse, it will not be exposed to the risk of bankruptcy. If, for example, the CCS investment in Prinos is committed to technology that requires emission allowance prices above €100/tonne of CO_2 to be viable, but for some reason these prices fall sharply, then the operator will even face the risk of bankruptcy, with all that this implies for the operation of permanent CO2 storage in Prinos.	



	STAKEHOLDERS					STAKEHOLDER DOCUMENTATION	ANALYSIS										ASSESSMENT				STAKEHOLDER ENGAGEMENT PLAN					
#	Stakeholder Group	Stakeholder Name	Additional details	Contact	Locality		Potential source of impact							Type of Influence	Legitimacy / Standing	Consenting /Permitting Role	Attitude	Impact	Influence	Priority	Action	Engagement Level	Frequency	Indicative Timing	Implemented meetings	KPI
			relevant department / direction (if applicable)	*publicly available contact details (if applicable)*	Local (L) National (N) International (I)		Natural environment (N)	Cultural Environment (C)	Landscape (L)	Tourism (T)	Fishing (F)	Other economic activities (E)	Strategic/ policy factors (P)	Regulatory/Legal (R)	Formal power / position of authority (F) Social power /ability to persuade (S)	Low (L) Medium (M) High (H)	Yes (Y) No (N)	Positive (P) Neutral (O) Negative(N) Uncertain (U)	Low (L) Medium (M) High (H)	Low (L) Medium (M) High (H)	Key Stakeholders (1) Potentially Active Stakeholders (2) Other Interested Parties (3)					
MICRO-GROUP	**National Authorities & Institutions** Greek Government-Ministry of Environment and Energy · Ministry of Labor and Social Security · Ministry of Culture (includes Archaeology and Cultural Heritage) · Ministry of Rural Development and Food (General Directorate of Fisheries) · Ministry of Tourism · Natural Environment and Climate Change Agency (OFYPEKA) - National Parks Management Unit Nestos Vistonida and Rhodope · Other competent national authorities and services as defined by national environmental permitting legislation-			info@ypen.gov.gr, ypourgos_erg@yeka.gr, grpllk@culture.gr, info@minagric.gr, info@minagric.gr, mpetrou@minagric.gr, mailbox@mintour.gr, info@necca.gov.gr, vistonis-rodopi@necca.gov.gr	N	Prominent role in the project with direct influence/impacts through decision-making, regulatory and permitting controls, etc. · If their views/concerns are not considered, they may take actions that could jeopardize the Project	☑	☑	☐	☑	☑	☐	☐	☐	F	H	**Yes**	P	H	**H**	**1**	**Information:** •Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) •Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.) **Consultation:** •Consultation meetings •Questionnaires •Tailored information materials •Online or offline monitoring/feedback reports on engagement outcomes **Active Participation:** •Stakeholder meetings •Roundtables with facilitated sessions •Ad-hoc direct contacts and calls •Key informant interviews / focus groups •Monitoring/feedback reports demonstrating understanding and consideration of issues raised **Collaboration:** •Regular and ad-hoc direct contacts, discussions, meetings, and phone calls •Online or offline monitoring and feedback reports covering all comments / inputs received	**Inform Consult Involve Collaborate as needed**	Ad hoc	Prior to the start of the construction phase of Phase 1 (Preparation and publication of the Project EIA) and throughout the project duration	15/10/2024	**Communication & Information Disclosure KPIs:** •Number of press releases, publications, and other informational materials developed by the Project. •Number of press releases, publications, and other informational materials disseminated/presented by the Project. •Number of re-publications or re-posts of Project materials. •Number and type of third-party publications (positive / negative). •Number of media publications achieved compared to planned. **Engagement Activities KPIs:** •Number of information and dialogue activities completed. •Number of minutes of meetings prepared (including comments raised, responses provided, and commitments made). •Number of stakeholder inputs/comments incorporated into Project planning. •Number of requests for additional information successfully addressed
	Central Government Authorities	Greek government	Vice Presintent of the Greek government	vicepresident@primeminister.gr	N		☐	☐	☐	☐	☐	☐	☑	☑	F	H	**Yes**	P	H	H	1	Informative Meeting Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	Implementation will begin before Phase 1 construction until decommissioning	31/07/2025	
	Central Government Authorities	Ministry of Economy and Finance	Deputy Minister of Economy and Finance	ministeroffice@minfin.gr	N		☐	☐	☐	☐	☐	☐	☑	☑	F	H	**Yes**	P	H	H	1	Informative Meeting/Conference Tailored information materials	•Inform •Consult •Involve	Ad hoc	As above	11/7/2025	
	Central Government Authorities	Ministry of Energy	Minister of Energy and Enviroment	secmin@ypen.gr	N		☐	☐	☐	☐	☐	☐	☑	☑	F	H	**Yes**	P	H	H	1	Informative Meeting/Conference Tailored information materials	•Inform •Consult •Involve •Collaborate	6,7 times per year at least - Ad hoc	As above	11/7/2025	
	Central Government Authorities	General Secretariat for Energy and Mineral Resources	General Secretary of Energy	gen.d.en@prv.ypeka.gr	N		☐	☐	☐	☐	☐	☐	☑	☑	F	H	**Yes**	P	H	H	1	Informative Meeting/Conference Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above		
	Central Government Authorities	General Secretariat for Natural Environment and Water	General Secretary of Environment and Water	ggenvr@ypen.gr	N		☑	☐	☐	☐	☐	☐	☑	☑	F	H	**Yes**	P	H	H	1	Informative Meeting/Conference Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above		
	National Institutions / Political parties	Parliament	Member of the parliament (Kavala representative	infopar@parliament.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	NO	P	H	H	1	Informative Meeting Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	Implementation will begin before Phase 1 construction	12/7/2024, 04/06/2025	
	National Institutions / Political parties	Parliament	Member of the parliament (Kavala representative) (Kavala	infopar@parliament.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	NO	P	H	H	1	Informative Meeting Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above	4/6/2025	
	National Institutions / Political parties	Parliament	Member of the parliament (Kavala representative) (Kavala	infopar@parliament.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	NO	P	H	H	1	Informative Meeting Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above	09/07/2024, 4/6/2025	
	National Institutions / Political parties	Parliament	Member of the parliament (Kavala representative) (Kavala	infopar@parliament.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	NO	P	H	H	1	Informative Meeting Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above	29/08/2024	
	National Institutions / Political parties	Parliament	Member of the parliament (Drama representative) Opposition	infopar@parliament.gr	N		☐	☐	☐	☑	☐	☐	☑	☑	F	M	NO	P	M	M	2	Informative Meeting Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	19/03/2025	
	National Institutions / Political parties	Parliament	Member of the parliament - Head of the environment for the opposition	infopar@parliament.gr	N		☑	☐	☐	☐	☐	☐	☑	☑	F	L	NO	P	M	M	2	Informative Meeting Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	20/03/2025	
	National Institutions	Hellenic Hydrocarbons and Energy Resources Management company	Managing Director	contact@herema.gr	N		☑	☐	☐	☐	☐	☐	☑	☑	F	H	**Yes**	P	H	H	1	Informative Meeting/conferences/consultation meetings Tailored information materials	•Inform •Consult •Involve •Collaborate	Almost every month	As above	7/7/2025	

	STAKEHOLDERS					STAKEHOLDER DOCUMENTATION	ANALYSIS										ASSESSMENT				STAKEHOLDER ENGAGEMENT PLAN					
#	Stakeholder Group	Stakeholder Name	Additional details	Contact	Locality		Potential source of impact								Type of Influence	Legitimacy / Standing	Consenting /Permitting Role	Attitude	Impact	Influence	Priority	Action	Engagement Level	Frequency	Indicative Timing	Implemented meetings	KPI
MICRO-GROUP	**Regional & local Authorities** -Decentralized Administration of Macedonia-Thrace (Civil Protection Directorate, Civil Defense Section (PAM), Emergency Planning Section (PSEA), Environment and Spatial Planning Directorate of Eastern Macedonia-Thrace, Water Directorate Eastern Macedonia-Thrace, Directorate of Rural Affairs Eastern Macedonia-Thrace) · Region of Eastern Macedonia and Thrace · Regional Unit of Kavala · Municipal Councils of Kavala, Nestos, Pagaio, and Thasos and relevant municipal departments (e.g. Technical Services Department) · Coast Guard - Hellenic Coast Guard (2nd Regional Directorate) · Fire Department (Regional Fire Directorate of Eastern Macedonia and Thrace, Fire Service Kavala) · Ephorate of Underwater Antiquities, Ephorate of Antiquities Kavala, Directorate of Modern Monuments and Technical Works of Eastern Macedonia and Thrace-			pamth@pamth.gov.gr,	L	Direct influence/impact on the Project through regulatory enforcement · Interest in project impacts on local safety, emergency planning, accident prevention, etc. · If their views/concerns are not considered, they may take actions that could jeopardize the Project	☑	☑	☐	☐	☐	☐	☑	☑	F	H	**Yes**	P	M	H	1	**Information:** • Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) • Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.) **Consultation:** • Consultation meetings • Questionnaires • Tailored information materials • Online or offline monitoring/feedback reports on engagement outcomes **Active Participation:** • Stakeholder meetings • Roundtables with facilitated sessions • Ad-hoc direct contacts and calls • Key informant interviews / focus groups • Monitoring/feedback reports demonstrating understanding and consideration of issues raised **Collaboration:** • Regular and ad-hoc direct contacts, discussions, meetings, and phone calls • Online or offline monitoring and feedback reports covering all comments / inputs received	**Inform** **Consult** **Involve** **Collaborate as needed**	Ad hoc	Prior to the start of the construction phase of Phase 1 and throughout the project duration	15/10/2024	**Communication & Information Disclosure KPIs:** • Number of press releases, publications, and other informational materials developed by the Project. • Number of press releases, publications, and other informational materials disseminated/presented by the Project. • Number of re-publications or re-posts of Project materials. • Number and type of third-party publications (positive / negative). • Number of media publications achieved compared to planned. **Engagement Activities KPIs:** • Number of information and dialogue activities completed. • Number of minutes of meetings prepared (including comments raised, responses provided, and commitments made). • Number of stakeholder inputs/comments incorporated into Project planning. • Number of requests for additional information successfully addressed
	Regional Authority	Regional Council	Regional Councilor (Kavala)	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	H	H	1	Informative Meeting Tailored information materials	• Inform • Consult • Involve • Collaborate	Ad hoc	Implementation will begin before Phase 1 construction until decommissioning	10/7/2025	
	Regional Authority	Regional Council	Regional Councilor	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	H	H	1	Informative Meeting Tailored information materials	• Inform • Consult • Involve • Collaborate	Ad hoc	As above	11/7/2025	
	Regional Authority	Region for Kavala	Vice Head of Region for Kavala	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations Tailored information materials	• Inform • Consult • Involve • Collaborate	Ad hoc	As above	15/10/2024- 11/7/2025	
	Regional Authority	Region for Environment	Vice Head of region for Environment	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations Tailored information materials	• Inform • Consult • Involve • Collaborate	Ad hoc	As above	12/10/2024- 11/7/2025	
	Regional Authority	Regional Council of Kavala	Regional Councilor of Kavala	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	H	H	1	Informative Meeting Tailored information materials	• Inform • Consult • Involve • Collaborate	Ad hoc	As above	29/7/2024	
	Regional Authority	Environmental Committee of the Region	Vice Chairman of Environmental Committee of the Region	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	H	M	1	Informative Meeting Tailored information materials	• Inform • Consult • Involve • Collaborate as needed	Ad hoc	As above	13/09/2024	
	Regional Authority	Region - Opposition	Head of Opposition in the Region	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	**Yes**	P	M	M	2	Informative Meeting Tailored information materials	Inform • Consult • Involve as needed	Ad hoc	As above	29/8/2024 15/10/2024	
	Regional Authority	Regional Council	Regional Councilor	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	M	M	2	Informative Meeting Tailored information materials	Inform • Consult • Involve as needed	Ad hoc	As above		
	Regional Authority	Region for Development	Vice Head of Region for Development	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	H	M	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations Tailored information materials	Inform • Consult • Involve as needed	Ad hoc	As above	4/10/2024 15/10/2024 15/10/2024	
	Regional Authority	East Macedonia & Thrace Region	Head of Region of East Macedonia & Thrace	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☑	☑	☑	F	M	**Yes**	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations Tailored information materials	• Inform • Consult • Involve • Collaborate	Ad hoc	As above	15/10/2024 11/06/2025	
	Regional Authority	East Macedonia & Thrace Region (Tourism)	Vice Head of East Macedonia & Thrace Region for Tourism	pamth@pamth.gov.gr	L		☑	☑	☐	☑	☐	☐	☑	☑	F	M	**Yes**	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations Tailored information materials	• Inform • Consult • Involve • Collaborate	Ad hoc	As above	15/10/2024 11/06/2025	
	Regional Authority	East Macedonia & Thrace Region for (Sports and Culture)	Vice Head of East Macedonia & Thrace Region for Sports and Culture	pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	**Yes**	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations Tailored information materials	• Inform • Consult • Involve • Collaborate	Ad hoc	As above	15/10/2024 11/06/2025	

	STAKEHOLDERS					STAKEHOLDER DOCUMENTATION	ANALYSIS										ASSESSMENT				STAKEHOLDER ENGAGEMENT PLAN					
#	Stakeholder Group	Stakeholder Name	Additional details	Contact	Locality		Potential source of impact								Type of Influence	Legitimacy / Standing	Consenting /Permitting Role	Attitude	Impact	Influence	Priority	Action	Engagement Level	Frequency	Indicative Timing	Implemented meetings	KPI
	Regional Authority	Kavala Service of Civil Protection		pamth@pamth.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	M	Yes	P	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations Tailored information materials	•Inform •Consult •Involve	Ad hoc	As above	15/10/2024	
	Regional Authority	East Macedonia & Thrace (Environmental Directorate)	Environmental Directorate of East Macedonia & Thrace (Kavala)	www.m-t.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	M	Yes	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above	7/7/2025 01/3/2025 15/10/2024	
	Regional Authority	Decentralised Administration (Kavala)	Directorate of Waters in Decentralised Administration (Kavala)	www.m-t.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	F	H	Yes	P	H	H	1	/nformative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above	7/7/2025 01/2/2025 15/10/2024	
	Local Authority	Municipality of Paggaio	Mayor of Paggaio	info@dimospaggaiou.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	NO	P	H	H	3	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	9/7/2024 15/10/2024 12/7/2025	
	Local Authority	Nea Karvali Community	President of Nea Karvali Community		L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	NO		M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	10/07/2024 15/10/2024 07/07/2025	
	Local Authority	Municipality of Thassos	Mayor of Thasos	dimos@thassos.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	NO		M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Informative Event held byTEE East..Macedonia at Thassos Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	15/10/2024 30/01/2025	
	Local Authority	Municipality of Kavala	Opposition at the Municipality of Kavala	gdirect@kavala.gov.gr	L		☑	☐	☑	☑	☐	☐	☑	☑	S	L	NO	N	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	05/4/2025 07/07/2025	
	Local Authority	Municipality of Nestos	Mayor of Nestos	mail@dimosnestou.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	NO	P	H	M	1	informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council	Inform •Consult •Involve as needed	Ad hoc	As above	15/10/2024 30/3/2025	
	Local Authority	Municipality of Kavala	Kavala Municipality Council	gdirect@kavala.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	NO	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above	7/7/2025	
	Local Authority	Municipality of Kavala	Mayor of Kavala	gdirect@kavala.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	M	NO		H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/plus the regional council Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc	As above	7/7/2025 01/3/2025 15/10/2024	
	Local Authority	Municipality of Kavala	Opposition leader at the Municipality of Kavala	gdirect@kavala.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	NO	P	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	7/7/2025 10/9/2024	
	Local Authority	Municipality of Paggaio	Opposition leader at the Municipality of Paggaio	info@dimospaggaiou.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	NO	N	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	7/7/2025 14/9/2024	
	Local Authority	Municipality of Nestos	Opposition leader at the Municipality of Nestos	mail@dimosnestou.gov.gr	L		☑	☐	☐	☐	☐	☐	☑	☑	S	L	NO	N	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	7/7/2025 17/9/2024	
	Local Authority	Municipality of Kavala Development Company	Head of the Municipality of Kavala Development	gdirect@kavala.gov.gr	L		☐	☐	☐	☐	☐	☑	☑	☑	S	L	NO	P	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	7/7/2025 17/5/2025	
	Local Authority	Kavala Central Port Authority	Kavala Central Port Authority Chief		L		☑	☐	☐	☐	☐	☐	☐	☑	F	M	NO	P	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	Prior to construction phase Construction Operation	7/7/2025 15/10/2024	
	Local Authority	Kavala Port Authority	Kavala Port Authority Administration	info@portkavala.gr	L		☑	☐	☐	☐	☐	☐	☐	☑	S	L	NO	P	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	Inform •Consult •Involve as needed	Ad hoc	As above	7/7/2025 12/07/2024 15/10/2024	
	Local Authority	Kavala fire brigade		kavala@psnet.gr;	L		☑	☐	☐	☐	☐	☐	☐	☑	S	L	NO	P	L	L	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	•Inform •Consult	Ad hoc	As above	7/7/2025 13/07/2024 15/10/2024 Adhoc	
	Local Authority	Kavala Port Fire brigade		press@fireservice.gr	L		☑	☐	☐	☐	☐	☐	☐	☑	S	L	NO	P	L	L	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council Tailored information materials	•Inform •Consult	Ad hoc	As above	7/7/2025 13/07/2024 15/10/2024 Adhoc	

	STAKEHOLDERS					STAKEHOLDER DOCUMENTATION	ANALYSIS										ASSESSMENT				STAKEHOLDER ENGAGEMENT PLAN					
#	Stakeholder Group	Stakeholder Name	Additional details	Contact	Locality		Potential source of impact								Type of Influence	Legitimacy / Standing	Consenting /Permitting Role	Attitude	Impact	Influence	Priority	Action	Engagement Level	Frequency	Indicative Timing	Implemented meetings	KPI
MCRO-GROUP	**Local Populations** Residents of Kavala, Nestos, Pagaio, and Thasos municipalities · Residents of the Region of Eastern Macedonia and Thrace · Hospitality and retail businesses in the area · Local fishermen · Local construction businesses · Professional associations (fishing, aquaculture, tourism, etc.) · Populations living close to the Project sites and related infrastructure, including local entrepreneurs · Residents of communities near transport routes used for material transport during construction · Residents of municipalities with broader economic interests related to project activities (e.g. employment, suppliers, etc.)				L	This group has a high interest in the Project as the majority of the population in the Kavala Gulf area lives in Kavala city and nearby coastal suburbs and villages as well as on Thasos island and is likely to be affected by the project. Fishermen are the main users of the sea. Their interest in the project is high as their sole source of income comes from the use of the sea.	☑	☐	☐	☐	☐	☐	☐	☐	s	M	NO	P	H	M	1	**Information:** •Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) •Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.) **Consultation:** •Consultation meetings •Questionnaires •Tailored information materials •Online or offline monitoring/feedback reports on engagement outcomes **Active Participation:** •Stakeholder meetings •Roundtables with facilitated sessions •Ad-hoc direct contacts and calls •Key informant interviews / focus groups •Monitoring/feedback reports demonstrating understanding and consideration of issues raised	**Inform** **Consult** **Involve**	Ad hoc/Updates of the project	Prior to the start of the construction phase of Phase 1 and throughout the project duration	7/7/2025 30/01/2025 15/10/2024	**Communication & Information Disclosure KPIs:** •Number of press releases, publications, and other informational materials developed by the Project. •Number of press releases, publications, and other informational materials disseminated/presented by the Project. •Number of re-publications or re-posts of Project materials. •Number and type of third-party publications (positive / negative). •Number of media publications achieved compared to planned. **Engagement Activities KPIs:** •Number of information and dialogue activities completed. •Number of minutes of meetings prepared (including comments raised, responses provided, and commitments made). •Number of stakeholder inputs/comments incorporated into Project planning. •Number of requests for additional information successfully addressed
	Local communities	Kavala local community	Municipality of Kavala (Municipality council informative meeting)	gdirect@kavala.gov.gr	L		☑	☐	☑	☑	☑	☑	☐	☐	S	M	NO	P	H	H	1	Informative meeting Tailored information materials Online project webpage/section, media outlets Press releases	•Inform •Consult •Involve •Collaborate as needed	Ad hoc	Prior to the start of the construction phase of Phase 1 and throughout the project duration	07/07/2025	
	Local communities		Technical chamber informative meeting in Thassos	teeam@tee.gr	L		☑	☐	☑	☑	☑	☑	☐	☐	S	M	NO	N	M	M	2	Informative meeting in Thassos/Regional council/Municipality council/Techical report Tailored information materials Online project webpage/section, media outlets Press releases	•Inform •Consult •Involve	Ad hoc	As above	7/7/2025 30/01/2025 15/10/2024	
	Local businesses/ professionals	Kavala trade Union		empsykav@otenet.gr	L		☑	☐	☐	☑	☑	☑	☐	☐	S	L	NO	P	L	L	3	Informative Meeting/nformative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Online project webpage/section, media outlets Press releases	•Inform	Ad hoc	As above	7/7/2025 30/01/2025 15/10/2024	
	Fishermen & fishing association	Kavala Fisheries association		no email available	L		☑	☐	☐	☐	☑	☐	☐	☐	S	L	NO	N	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Tailored information materials Online project webpage/section, media outlets Press releases	•Inform •Consult •Involve	Ad hoc	As above	7/7/2025 30/01/2025 15/10/2024	
MCRO-GROUP	**Vulnerable Groups** Vulnerable groups refer to individuals who, due to gender identity, ethnicity, age, disability, economic disadvantage, or social status, may be disproportionately affected by the project impacts relative to others and may have limited ability to claim or benefit from project advantages · Such individuals in the context of the Project include: - Those living below the poverty line - Single-parent households - Households with members with disabilities - Elderly people - Children -					**At this stage, no vulnerable groups were identified as potentially being disproportionately affected by the Project.** This conclusion is based on: The offshore location of primary operations, removing direct exposure for coastal or inland communities; The use of established industrial areas and port facilities for onshore works, where public access is already restricted.																			
							☐	☐	☐	☐	☐	☐	☐	☐												
MCRO-GROUP	**Employees / Staff** ·Employees of EnEarth ·			unionenergeankavala@gmail.com	L	Worker involvement and participation in Project implementation is important · Interest in employment · Workers' rights and working conditions · Possible collective actions may negatively affect the Project implementation timeline									s	H	NO	P	H	H	1	**Information:** •Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) •Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.) **Consultation:** •Consultation meetings •Questionnaires •Tailored information materials •Online or offline monitoring/feedback reports on engagement outcomes **Active Participation:** •Stakeholder meetings •Roundtables with facilitated sessions •Ad-hoc direct contacts and calls •Key informant interviews / focus groups •Monitoring/feedback reports demonstrating understanding and consideration of issues raised **Collaboration:** •Regular and ad-hoc direct contacts, discussions, meetings, and phone calls •Online or offline monitoring and feedback reports covering all comments / inputs received	i**nform** **Consult** **Involve** **Collaborate**		Prior to the start of the construction phase of Phase 1 and throughout the project duration	almost every month regarding the work progress	**Communication & Information Disclosure KPIs:** •Number of press releases, publications, and other informational materials developed by the Project. •Number of press releases, publications, and other informational materials disseminated/presented by the Project. •Number of re-publications or re-posts of Project materials. •Number and type of third-party publications (positive / negative). •Number of media publications achieved compared to planned. **Engagement Activities KPIs:** •Number of information and dialogue activities completed. •Number of minutes of meetings prepared (including comments raised, responses provided, and commitments made). •Number of stakeholder inputs/comments incorporated into Project planning. •Number of requests for additional information successfully addressed
	Employees / Staff	Employees		unionenergeankavala@gmail.com	L		☐	☐	☐	☐	☐	☑	☐	☐	S	H	NO	P	H	H	1	informative meeting/They made a public positive statement Online project webpage/section	•Inform •Consult •Involve •Collaborate as needed	Bi-annual & ad hoc as needed	Prior to the start of the construction phase of Phase 1 and throughout the project duration	26/4/2025	

	STAKEHOLDERS					STAKEHOLDER DOCUMENTATION	ANALYSIS										ASSESSMENT				STAKEHOLDER ENGAGEMENT PLAN					
#	Stakeholder Group	Stakeholder Name	Additional details	Contact	Locality		Potential source of impact								Type of Influence	Legitimacy / Standing	Consenting /Permitting Role	Attitude	Impact	Influence	Priority	Action	Engagement Level	Frequency	Indicative Timing	Implemented meetings	KPI
MICRO-GROUP	**Private sector organizations involved in Project Implementation** -Contractors, subcontractors, suppliers and their personnel .					Contractors and subcontractors participate in project execution and ensure compliance with labor rights and workplace standards · Directly involved in site development and have a vested interest in project success · Concerned with labor rights, working conditions, health and safety									S	H	NO	P	H	H	1	**Information:** •Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) •Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.) **Consultation:** •Consultation meetings •Questionnaires •Tailored information materials •Online or offline monitoring/feedback reports on engagement outcomes **Active Participation:** •Stakeholder meetings •Roundtables with facilitated sessions •Ad-hoc direct contacts and calls •Key informant interviews / focus groups •Monitoring/feedback reports demonstrating understanding and consideration of issues raised **Collaboration:** •Regular and ad-hoc direct contacts, discussions, meetings, and phone calls •Online or offline monitoring and feedback reports covering all comments / inputs received	**Inform** **Consult** **Involve** **Collaborate**	As required by Corporate and project-specific ESMS Ad hoc as needed	Prior to the start of the construction phase of Phase 1 and throughout the project duration		**Communication & Information Disclosure KPIs:** •Number of press releases, publications, and other informational materials developed by the Project. •Number of press releases, publications, and other informational materials disseminated/presented by the Project. •Number of re-publications or re-posts of Project materials. •Number and type of third-party publications (positive / negative). •Number of media publications achieved compared to planned. **Engagement Activities KPIs:** •Number of information and dialogue activities completed. •Number of minutes of meetings prepared (including comments raised, responses provided, and commitments made). •Number of stakeholder inputs/comments incorporated into Project planning. •Number of requests for additional information successfully addressed
							☐	☐	☐	☐	☐	☐	☐	☐													
							☐	☐	☐	☐	☐	☐	☐	☐													
MICRO-GROUP	**Media** - International, national and local media including print press, radio, television, online media (social media, websites, blogs, etc.) ·				L/N	Cover the news related to the Project on an ongoing basis · Inform the public and stakeholder groups about key project aspects · Can influence by acting as information dissemination agents allowing reach to wider audiences									s	H	NO	P	H	M	2	**Information:** •Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) •Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.) **Consultation:** •Consultation meetings •Questionnaires •Tailored information materials •Online or offline monitoring/feedback reports on engagement outcomes **Active Participation:** •Stakeholder meetings •Roundtables with facilitated sessions •Ad-hoc direct contacts and calls •Key informant interviews / focus groups •Monitoring/feedback reports demonstrating understanding and consideration of issues raised	**Inform** **Consult as needed** **Involve as needed**		Prior to the start of the construction phase of Phase 1 and throughout the project duration		**Communication & Information Disclosure KPIs:** •Number of press releases, publications, and other informational materials developed by the Project. •Number of press releases, publications, and other informational materials disseminated/presented by the Project. •Number of re-publications or re-posts of Project materials. •Number and type of third-party publications (positive / negative). •Number of media publications achieved compared to planned. **Engagement Activities KPIs:** •Number of information and dialogue activities completed. •Number of minutes of meetings prepared (including comments raised, responses provided, and commitments made). •Number of stakeholder inputs/comments incorporated into Project planning. •Number of requests for additional information successfully addressed
	Local media	Local media outlets		Several emails from the local media that we can provide it if need it (info@centertv.gr; eva.pasalidou@yahoo.gr; info@enachannel.gr; habitleutheris@yahoo.gr; info@xanthipress.gr; news@kavalanews.gr)	L		☑	☐	☐	☑	☐	☑	☑	☑	S	L	NO	P	M	H	1	Informative meeting Press releases Online project webpage/section	•Inform •Consult •Involve •Collaborate	Weekly	Prior to the start of the construction phase of Phase 1 and throughout the project duration	17/01/2025 meeting Multiple press releases, publications since 2023 (see relevant folder)	
	NNational media	National media outlets			N		☐	☐	☐	☐	☐	☑	☑	☑	S	L	NO	P	L	L	3	Press releases Online project webpage/section	•Inform	Ad hoc	Prior to the start of the construction phase of Phase 1 and throughout the project duration	Multiple press releases, publications since 2023 (see relevant folder)	
MICRO-GROUP	**CSOs** - NGOs e.g. Society for the Protection of Nature and Eco-development, Kavala Ecological Movement, Greenpeace Greece, WWF Hellas, Hellenic Ornithological Society and other possible national/international NGOs with interest in the Project · Think tanks e.g. Institute of Energy for Southeast Europe (IENE), The Hellenic Association for Energy Economics (HAEE) · Professional organizations including Technical Chamber of Greece/Eastern Macedonia Regional Department, Kavala Chamber of Commerce & Industry, Kavala Labor Center etc. · Other CS organizations (e.g. Kavala Nautical Club, Kavala Sea Sports Club) ·				L/N	Interest in environmental and social issues · Can act as information dissemination agents on Project-related information · Professional organizations may have economic or other interests either as suppliers or as bodies connected mainly (directly or indirectly) with construction materials and other supplies. They also provide expert advice on project aspects related to their field of expertise									S	L	NO	P	M	M	2	**Information:** •Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) •Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.) **Consultation:** •Consultation meetings •Questionnaires •Tailored information materials •Online or offline monitoring/feedback reports on engagement outcomes **Active Participation:** •Stakeholder meetings •Roundtables with facilitated sessions •Ad-hoc direct contacts and calls •Key informant interviews / focus groups •Monitoring/feedback reports demonstrating understanding and consideration of issues raised	**Inform** **Consult** **Involve as needed**	Ad hoc	Prior to the start of the construction phase of Phase 1 and throughout the project duration		**Communication & Information Disclosure KPIs:** •Number of press releases, publications, and other informational materials developed by the Project. •Number of press releases, publications, and other informational materials disseminated/presented by the Project. •Number of re-publications or re-posts of Project materials. •Number and type of third-party publications (positive / negative). •Number of media publications achieved compared to planned. **Engagement Activities KPIs:** •Number of information and dialogue activities completed. •Number of minutes of meetings prepared (including comments raised, responses provided, and commitments made). •Number of stakeholder inputs/comments incorporated into Project planning. •Number of requests for additional information successfully addressed
	CSOs: Chambers, Unions & Professional Associations														S												
	Association	Kavala trade association		info@oevek.gr;	L		☑	☑	☑	☑	☐	☐	☐	☐	S	L	NO	P	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Online project webpage/section, media outlets Press releases Tailored information materials	•Inform •Consult •Involve	Ad hoc		7/7/2025 29/01/2025 15/10/2024	
	Association	Thasos Hoteliers Association	President of Thasos Hoteliers Association	info@hotelsthassos.gr	L		☑	☑	☑	☑	☐	☐	☐	☐	S	L	NO	N	M	M	2	informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/informative meeting from technical chamber in Thasso	•Inform •Consult •Involve	Ad hoc		7/7/2025 30/01/2025 15/10/2024	
	Association	Region of Kavala Hoteliers Association	President of region of Kavala Hoteliers Association	amitzalis@lucyhotel.gr	L		☐	☐	☐	☐	☐	☐	☐	☐	S	L	NO	P	M	M	2	informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Online project webpage/section, media outlets Press releases Tailored information materials	•Inform •Consult •Involve	Ad hoc		7/7/2025 6/04/2025 15/10/2024	

	STAKEHOLDERS					STAKEHOLDER DOCUMENTATION	ANALYSIS										ASSESSMENT				STAKEHOLDER ENGAGEMENT PLAN					
#	Stakeholder Group	Stakeholder Name	Additional details	Contact	Locality		Potential source of impact								Type of Influence	Legitimacy / Standing	Consenting /Permitting Role	Attitude	Impact	Influence	Priority	Action	Engagement Level	Frequency	Indicative Timing	Implemented meetings	KPI
	Chamber	Technical Chamber of East Macedonia	President of Technical Chamber of East Macedonia	pde-teeam@tee.gr	L		☑	☐	☐	☐	☐	☐	☐	☐	S	M	NO	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Online project webpage/section, media outlets Press releases Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc		7/7/2025 30/01/2025 15/10/2024	
	Chamber	Kavala commercial Chamber		info@chamberofkavala.gr;	L		☑	☐	☑	☑	☐	☑	☑	☐	S	M	NO	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Online project webpage/section, media outlets Press releases Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc		7/7/2025 30/01/2025 15/10/2024	
	Chamber	Financial Chamber of Kavala region		oee@oe-e.gr	L		☑	☐	☐	☐	☑	☑	☑	☐	S	L	NO	P	M	M	2	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Online project webpage/section, media outlets Press releases Tailored information materials	•Inform •Consult •Involve	Ad hoc		7/7/2025 30/01/2025 15/10/2024	
	CSOs: NGOs, Activists																									
	NGO						☐	☐	☐	☐	☐	☐	☐	☐													
	Grassroot organization						☐	☐	☐	☐	☐	☐	☐	☐													
	Association						☐	☐	☐	☐	☐	☐	☐	☐													
MICRO-GROUP	**Academia: Universities, Institutes** - Universities and Educational Organizations (e.g. Democritus University of Thrace, Institute of Fisheries Research) ·				L/N	May have scientific interest in the project (research, education, and training related to the project)										L	NO	P	**M**	**M**	**2**	**Information:** •Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) •Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.) **Consultation:** •Consultation meetings •Questionnaires •Tailored information materials •Online or offline monitoring/feedback reports on engagement outcomes **Active Participation:** •Stakeholder meetings •Roundtables with facilitated sessions •Ad-hoc direct contacts and calls •Key informant interviews / focus groups •Monitoring/feedback reports demonstrating	**Inform Consult Involve as needed**		Adhoc - Project Update	7/7/2025 30/01/2025 15/10/2024	**Communication & Information Disclosure KPIs:** •Number of press releases, publications, and other informational materials developed by the Project. •Number of press releases, publications, and other informational materials disseminated/presented by the Project. •Number of re-publications or re-posts of Project materials. •Number and type of third-party publications (positive / negative). •Number of media publications achieved compared to planned. **Engagement Activities KPIs:** •Number of information and dialogue activities completed. •Number of minutes of meetings prepared (including comments raised, responses provided, and commitments made). •Number of stakeholder inputs/comments incorporated into Project planning. •Number of requests for additional information successfully addressed
	Universities	chemistry department of Democritus University		secr@chem.duth.gr	L		☐	☐	☐	☐	☐	☐	☐	☐	S	M	NO	P	H	H	1	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Online project webpage/section, media outlets Press releases Tailored information materials	•Inform •Consult •Involve •Collaborate	Ad hoc		7/7/2025 15/10/2024	
	Universities	MSc Oil and Gas of Democritus University		secr@chem.duth.gr	L		☐	☐	☐	☐	☐	☐	☐	☐	S	L	NO	P	L	L	3	Informative Meeting/Informative conference including Regional Geovernmental Authorities, Technical Authorities, and Associations/Kavala Municipality Council/ Online project webpage/section, media outlets Press releases Tailored information materials	•Inform	Ad hoc		7/7/2025 15/10/2024	
	Research Institutes	Society Petroleum Engineers		spedal@spe.org	I		☐	☐	☐	☐	☐	☐	☐	☐	S	L	NO	P	M	M	2	Informative meeting /summit Tailored information materials	•Inform •Consult	Ad hoc		25/6/2025	
	Research Institutes	Institute of oil,gas and renewables		secr@chem.duth.gr	I		☐	☐	☐	☐	☐	☐	☐	☐	S	L	NO	P	L	L	3	Informative meeting Online project webpage/section, media outlets Press releases Tailored information materials	•Inform	Ad hoc		12/5/2025	
MICRO-GROUP	**General Public** General population outside the wider Project area ·					May have interest in the Project as it may contribute positively to innovation and provide opportunities for knowledge and expertise building										L	NO	P	**L**	**L**	**3**	**Information:** •Online – offline dissemination (physical/virtual events, dedicated project webpage/section, other stakeholders' websites, media outlets) •Press releases – project newsletters – project presentations – speeches (basic project information, benefits/opportunities, progress, etc.)	**Inform**	Ad hoc/ Updates on the project		7/7/2025 30/01/2025 15/10/2024	**Communication & Information Disclosure KPIs:** •Number of press releases, publications, and other informational materials developed by the Project. •Number of press releases, publications, and other informational materials disseminated/presented by the Project. •Number of re-publications or re-posts of Project materials. •Number and type of third-party publications (positive / negative). •Number of media publications achieved compared to planned.
	General Public (to be reached via CSOs-Media)				N		☐	☐	☐	☐	☐	☑	☑	☑		L		U	**L**	**L**	3	Press releases Online project webpage/section	•Inform	Ad hoc	Prior to the start of the construction phase of Phase 1 and throughout the project duration	Multiple press releases, publications since 2023 (see relevant folder)	