

## **Annex No. 9**

December 7, 2005

Dear President Valdas Adamkus, let's get down on the railway trackage together for the nature, but not against the landfill in Kazokiskes.

Open Letter to His Excellency President Valdas Adamkus

**By Linas Vainius, a citizen and environmental activist, Council member of the Atgaja Society**

It has been an ordinary occasion, when a noise has been made regarding the construction of a landfill in Kazokiskes by trying to use President Valdas Adamkus' authority. Interested persons and their sponsors acting against the landfill construction have succeeded in preparation of a letter on the President's behalf and submitted it to the Prime Minister suggesting to stop the construction works of the landfill being in progress already.

Exercising the same right as opponents of the landfill in Kazokiskes, I address publicly President Valdas Adamkus so that he might also listen to other opinion concerning the said issue, so that he doesn't stop the implementation of this project, which is important to environment as well as to human health. I feel ashamed that the authority of our President as a famous environmentalist is being used so unreasonably, by making controversial statements with unsubstantiated requirements in relation to the environmental site which is of extreme importance for entire population in Vilnius County.

Being a representative of non-governmental organization, I was involved in preparation of the feasibility study for Vilnius regional municipal waste landfill and also witnessed further implementation of this project, including the related protestation and unrighteous criticism towards the project.

In preparation of the aforementioned feasibility study, sites suitable for Vilnius regional landfill have been properly analyzed and two variants selected. The environmental impact assessments have been performed for both variants. The site in Kazokiskes has been finally selected with approvals from all responsible regulation institutions. In compliance with legislation and procedures applicable at that time, public health impact has been also assessed and approved by the same public health care institutions, which presently are criticizing the decisions they have earlier made themselves. Many environmentalists and persons residing nearby polluting sites would like the public health supervisors could be so demanding and high-principled in all other cases. Unfortunately, this is an extremely rare and, as I would call it, solitary initiative.

We should remember that we are talking about the construction of a new modern household waste handling landfill, which is one out of 11 regional landfills planned in Lithuania and necessary for Lithuania to fulfill the EU directives regarding landfills and waste management. Even more this landfill is important for ALL residents of Vilnius County (also for those who protest against it), as not a single landfill out of 134 officially operated landfills in Vilnius County is in compliance with Lithuanian or European Community environmental requirements, are unsafe and hazardous to nature and human health. EU funds allocated to the development of municipal waste handling system in Vilnius County will also be used for closing and aftercare of those dangerous landfills. Presently functioning main landfill in Kariotiskes, to which waste from Vilnius is being transported, is overfilled and has had to be closed a long time ago. In some 2-4 years Vilnius' residents will have no place, where they can bury their waste. The Kariotiskes landfill is also near the Trakai Historical National Park, local residents have been also complaining about its negative impact on

environment and their health for years. Closing of the Kariotiskes landfill, construction of waste collection and container grounds and other works in different municipalities of Vilnius County are planned during the period of this project implementation. In construction and operation of the landfill in Kazokiskes, annual subsidies to the residents of Kazokiskes village and other nearby vicinities are planned in order they may improve their environment and life quality. This case is without precedent in Lithuania and I believe that the experience gained through its implementation will be successfully used in other places of Lithuania.

Unfortunately, I haven't heard what solutions the most aggressive landfill site critics, land owners of the nearby territories and local community suggest for municipal waste handling in Vilnius County. In one of the meetings, I have just asked them about it, but never hear any answer.

As many environmental activists, I am ready in support of the President to get down on the railway trackage to protect the Ministry of Environment against destructive suggestions related to its liquidation. But, I hope, it won't take long for us to lie down freezing, as we have an important job to do consolidating public efforts and acting against an avalanche of destructive suggestions and initiatives urging for privatization of the state-owned forests, giving out the last pieces of land even within the protected areas to private sector (forgetting the public interest), objectives to renew absurd airport project in Nida (the same the President has actively spoken against), problems of unsanctioned construction in the territory of Curonian Spit, renewed plans for oil extraction on the shore of the Curonian Lagoon near Kintai (protested so actively by local communities).

Dear President, all persons who are concerned about Lithuanian nature highly appreciate your initiatives in solving the most urgent environmental issues. Let's get down on the railway trackage together for the nature, but not against the landfill in Kazokiskes.

## **Annex No. 8**

### **THE THREAT TO KERNAVE BY KAZOKISKES LANDFILL IS OVERESTIMATED**

#### **Notes by a witness about the noise being made in relation to the “monster” planned in Kazokiskes**

I have witnessed how the entire fabrication about the so-called negative impact on cultural heritage by the Kazokiskes landfill was born. Plucked out of the air, this fairy-tale evaporated in 2002. It is unbelievable that such absurd fabrication is affecting human minds again in summer 2004. I believe the landfill site in Kazokiskes has been selected with care and is perfectly fit for construction of municipal waste landfill in compliance with the European Community requirements.

I got well-aware of the problem in the period of 2001-2003, when I was the Deputy Chairman of the Lithuanian Green Movement (I am not at the moment) and Coordinator of the international CEE Bankwatch Organization. Being a representative of non-governmental organization, I took part in preparation of Vilnius County waste management system project. I was also involved in public discussions on its Environmental Impact Assessment Report. During such discussions two alternative sites for the municipal waste landfill of Vilnius County, one in Kazokiskes and the other near Sirvintos, were analyzed.

In public discussions of the EIA Report held in Elekrenai on May 21, 2002, (I would like to stress out here that not a single person residing in Kazokiskes was present in the meeting) one person suddenly stood up and said that he knew a church on the other bank of Neris, from the tower of which the pile of the planned landfill in Kazokiskes might be visible after 25-30 years of its operation. When we asked him to name that place or even show by using our own transport, the aforementioned person refused doing so and could not specify clearly, where such place was.

At that time no discussions were held on a possibility to see the landfill in Kazokiskes (after 25-30 years of its operation) from the castle hills in Kernave located in approximately 9 km on the other bank of Neris. This is simply impossible due to the distance and difference in altitudes.

A real problem to the national cultural heritage is the current landfill in Kariotiskes, located nearby the Trakai Historical National Park and violating all possible standards.

As it turned out the aforementioned person was quite a high-ranked official of Sirvintos District Municipality (Vice-Mayor, probably, I can't remember now). He was fairly interested in construction of Vilnius County landfill in the Sirvintos region, near the village of Lauryniskes. The official was actively speaking for this variant being the greatest investment in the Sirvintos region during the EIA Report discussion meeting held in Sirvintos, on May 23, 2002.

This was the only case, at least known to me, when the planned construction of the landfill on Kazokiskes site was associated with possible negative impact on cultural heritage within the entire project preparation stage from 2001-2002. Many officials from all municipalities in Vilnius County, Ministries of Environment, Health Care and Economy were actively and directly participating in the process. As required by applicable law, the EIA Report was submitted for approval to many institutions and officials, including representatives of the cultural heritage department. At that time anybody has raised “the issue of Kernave” as such problem has never really existed.

The question is why the protectors of the Cultural Reservation in Kernave cannot see any threat to the historical site caused by large industrial and municipal objects presently operated near Kazokiskes, such as water treatment facilities of Vievis and Elektrenai towns, pig farm with sludge

collection fields, oil base of Vilnius city, fuel base of Vievis town and Vievio Paukstynas poultry firm?

These “protectors” never raised the issue of since 1983 operated landfill on the present Kazokiskes site, where waste from Vievis and Elektrenai is handled till the present moment and about 30 “landfill people” reside and are engaged in waste sorting.

### Vilnius County Municipal Waste Management in Short

The project of Vilnius County Municipal Waste Management system was developed by the Danish company Ramboll selected by tender competition. The company is a well-known waste management system project developer all over Europe. In Lithuania it worked with Baltijos Konsultacine Grupe UAB within the period of 2001-2002.

The project was sponsored by the Ministry of Environment and Energy in Denmark (DANCEE) that provided its assistance to municipalities in Vilnius County in preparation of the waste management system project for the entire county.

The key goal of the project is preparing the proposal to the European Union ISPA Fund regarding the implementation of the Vilnius County Waste Management System in strict compliance with EU directives and requirements. Such a proposal has been prepared. Its total value is estimated up to 72 million Litass. 50 % of the aforementioned amount (about 35 million Litass) will be treated as ISPA Fund non-returnable guarantee, one third (26 million Litass) will be a loan and the remaining part (11 million Litass) will be the state subsidy.

About 27 million Litass out of this amount will be allocated for construction of the landfill in Kazokiskes. Other 14 million Litass will be used for closing and arrangement of presently operated landfills. There are 134 such landfills officially registered in Vilnius County. 18.5 million Litass will be granted for closing of the Kariotiskes landfill near Trakai by construction of biogas collection system. None of the aforementioned number of landfills is in compliance with Lithuanian or EU requirements. The landfill in Kariotiskes, to which waste from Vilnius is being transported, is overfilled and has had to be closed a long time ago. In some 2-4 years Vilnius’ residents will have no place, where they can handle their waste. During the period of this project implementation, construction of waste collection sites and container grounds and other works in different municipalities of Vilnius County are foreseen.

All and any actions related to the development of Vilnius County Waste Management System and selection of local landfill site were supervised by the Project Supervision Committee. Representatives of all municipalities in Vilnius County, Ministry of Environment and other responsible institutions were involved in the work of the Committee. The EIA Report discussion meetings were held in Elektrenai Municipality (for Kazokiskes site) and Sirvintos Municipality (for Sirvintos site).

But we obviously lacked their opinion in these discussions.

### International Response

Being well-aware of the landfill site selection activities and completely sure about the impartiality and transparency of the project, I presented this case as a positive case at the international conference in Brussels, European Parliament held November 25-26, 2002. The conference on the subject Billions for Sustainable Development? How Can we Do Better – Lessons in Use of the Membership Assistance Funds. Transparency and Public Involvement in the Membership Assistance Funds was organized by the Friends of the Earth International in cooperation with CEE

Bankwatch Network, Heinrich Boll Foundation and the European Parliament Green Fraction. Representatives of the European Commission, European Parliament, governments of EU membership seeking countries, as well as companies and non-governmental institutions took part in the conference. Mr. Arunas Kundrotas, the Minister of Environment of the Republic of Lithuania also presented his speech at one of the sessions.

For more comments, please, call 8-699-33661

Respectfully,

Linas Vainius, the Council member of the Atgaja Society and CEE Bankwatch Network Coordinator

## Annex No. 1

APPROVED:

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R. Sabaliauskas, the Director  
of the Regional Development Department

April 5, 2002

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### THE DEED OF CHECKING OF THE TERRITORY PLANNING DOCUMENT No. 103

Checking performing institution: Vilnius County Governor's Administration

Document under checking: Detailed plan of the project the Landfill Site in Kazokiskes

Initiator of the planning: Elektrenai Municipality,  
8, Elektrines St., Elektrenai

Detailed Plan prepared by: Baltijos Konsultacine Grupe UAB,  
11, Gostauto St., Vilnius

The list of documents  
presented for checking: Territory Development Program, Explanatory Note of the  
Detailed Plan, Drawings, Report of Public Hearing,  
Procedural and other additional documents;

Checking summary: Feasibility Study for the international project the  
Development of Vilnius County Waste Management  
System analyzing a few alternative sites for construction of  
a regional landfill;

Checking conclusion and suggestion  
for approving institution: The project Detailed Plan for the Landfill in Kazokiskes  
should be approved on the condition that the Detailed Plan  
will fully come into force only after the final decision will  
be passed on landfill site and the possibilities of carrying  
out the activity.

Note: the Checking Deed with Conclusion is valid for one year after its approval date. Where the approval of the territory planning document is failed within a year, the document must be checked repeatedly by issuing new checking deed.

Document approved by: Margarita Butautiene, the Head of the Territorial Planning  
Branch at the Regional Development Department, phone  
312583

Checking date:  
April 5, 2002

Signature: */signature/*

## Annex No. 2 Extract of the EIA Report of Vilnius County Municipal Waste Landfill, “Water” Section (page 29)

### 3.3.1.8 Possible Impact Reducing Measures

Foreseen impact reducing measures	Construction of an artificial insulating layer on the Landfill bed (0.5 m thickness compacted clay, 6 mm thickness concrete stone clay and high density polyethylene (HDPE) 2 mm height membrane layers);
	installation of separate collection systems for non-polluted surface water (from rain and melting snow) and leachate;
	re-cultivation of non-operated part of the pile;
	monitoring of surface and underground water and leachate;
Emergency situation prevention measures	Duplicate pumps are foreseen in the leachate and surface waste water pumping stations.

## **Annex No. 3 Extract of the EIA Report of Vilnius County Municipal Waste Landfill, “Technological Process” Section (pages 18-19)**

### **Technological Process. Landfill Gas Handling**

The landfill gas use system is foreseen, when electricity is generated out of the collected gas by special facilities and supplied on the electricity market.

The increase of gas output will depend on the quantity of waste collected on the landfill site, therefore the capacities of the electricity generating facilities will be increased gradually. Initially, the facilities will be equipped with one 2000 kW generator, but in approximately 4 years' time, the second similar generator will be required, and the third one in another 5 years.

Surplus non-recycled landfill gas and total quantity of gas implementing generator repair works or at emergency stoppages will be burned out in a special flare.

In cases of generator stoppages due to repairs or other reasons, the landfill gas will be burnt in a flare. In implementation and development of the landfill gas usage system, realization possibilities for the generated heat will have to be sought, as this might contribute to increased profitability of gas usage.



## **Annex No. 4 Extract of the EIA Report of Vilnius County Municipal Waste Landfill, “Environmental Air (Atmosphere)” Section (page 33)**

### **3.3.2.7. Analysis and Conclusion of Groundlevel Pollutant Concentration Calculation Results**

As revealed by the modeling results, the maximum allowable concentration of pollutants will never be exceeded neither by separate pollutants, nor in summarized groups.

Highest concentrations will be reached in cases of nitrous oxides and volatile organic compounds, 0.22 and 0.57 of maximum allowable concentrations respectively (see figures 1-5).

It is noteworthy that the situation has been analyzed in meteorological conditions, which are extremely unfavorable to dispersion of pollutants. Taking into consideration that such days are rare within a year, and concentration growth on such days is rather temporary phenomenon, we can state that no danger to human health and life will be caused in forecast cases.

## **Annex No. 5 Extract of the EIA Report of Vilnius County Municipal Waste Landfill, “Human Health” Section (pages 53-54)**

### **3.3.7.3. Human Health**

Quality of living conditions. The quality of living conditions in nearby villages located in the vicinity of the planned landfill site in Kazokiskes is poor. This is due to the reason that there are no centralized water supply and waste water drainage systems installed in the villages, the system of municipal services is rather poor and underdeveloped. The existing municipal utilities are ineffective due to the social and economic decline.

Population morbidity rate and tendencies for its changes. The density of population in the vicinity of the Kazokiskes landfill site is rather low with also small number of population. The morbidity rate in larger settlements located nearby the planned landfill site in Kazokiskes (such as Vievis) is similar to that of the closest regions and is close to the average registered in rural areas of Lithuania. Local population tends to associate their morbidity rate with the environmental quality (air pollution).

According to information received from the Lithuanian Health Center, none of mass or collective diseases related to the quality of environment have been registered in the area [40]. Local medical representatives state that infectious diseases are spreading exclusively rapidly in larger settlements (due to population and infrastructure object concentration). Collective diseases sometimes are manifested in rural residential areas due to poor sanitary – hygienic conditions (some outbreaks of dysentery in schools and kindergartens).

Possible landfill impact on the quality of living conditions. Direct impact on the life quality of population by the planned landfill site in Kazokiskes is impossible, as all residents must be moved out from the sanitary protection zone. At present, the planned sanitary protection zone is unpopulated. Under an emergency situation or a long-term technological breakdown, the worsening of living conditions can be felt in the sanitary protection zone of the landfill only.

Possible Landfill impact on human health. Direct impact on human health due to the planned economic activities in the landfill of Kazokiskes is impossible. This is determined by territorial distribution of population, the package of technical measures to ensure the minimum impact on environment planned in the course of the landfill operation and the scheduled mode within the sanitary protection zone of the landfill.

The waste carrying transportation going to and from the landfill site by the access road will cause noise only during working hours, therefore it will not disturb the residents' during their rest hours. The impact by additional transportation to persons residing near the highway Vilnius - Kaunas will be insignificant due to relatively low number of additional transportation.

**Annex No. 7**

THE MINISTRY OF HEALTH CARE OF THE REPUBLIC OF LITHUANIA  
**PUBLIC HEALTH CARE AND SPECIALIST TRAINING CENTER IN TRAKAI**

To: Mr. A. Vaisnoras, the Vice-President of  
Baltijos Konsultacine Grupe UAB

May 13, 2002  
No. 12-119

**CONCERNING APPROVAL OF THE ENVIRONMENTAL IMPACT ASSESSMENT  
REPORT OF VILNIUS COUNTY MUNICIPAL WASTE LANDFILL**

The Public Health Care and Specialist Training Center in Trakai presents hereby its approval for the Environmental Impact Assessment Report for Vilnius County Municipal Waste Landfill prepared by your company.

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Vytautas Kavaliunas, the Director

Contact person: J. Rybalko, call (8-238) 55854