Council of the European Union

Brussels, 8 July 2025
(OR. en)

11333/25
ADD 13

ENV 670
CLIMA 256
AGRI 326
PECHE 203
ECOFIN 964
COMPET 701

COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	7 July 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union
No. Cion doc.:	SWD(2025) 311 final
Subject:	COMMISSION STAFF WORKING DOCUMENT 2025 Environmental Implementation Review Country Report - GREECE *Accompanying the document* Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2025 Environmental Implementation Review for prosperity and security

Delegations will find attached document SWD(2025) 311 final.

Encl.: SWD(2025) 311 final

EUROPEAN
COMMISSION

Brussels, 7.7.2025
SWD(2025) 311 final

COMMISSION STAFF WORKING DOCUMENT

2025 Environmental Implementation Review
Country Report - GREECE

Accompanying the document

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions

2025 Environmental Implementation Review for prosperity and security

{COM(2025) 420 final} - {SWD(2025) 300 final} - {SWD(2025) 301 final} - {SWD(2025) 302 final} - {SWD(2025) 303 final} - {SWD(2025) 304 final} - {SWD(2025) 305 final} - {SWD(2025) 306 final} - {SWD(2025) 307 final} - {SWD(2025) 308 final} - {SWD(2025) 309 final} - {SWD(2025) 310 final} - {SWD(2025) 312 final} - {SWD(2025) 313 final} - {SWD(2025) 314 final} - {SWD(2025) 315 final} - {SWD(2025) 316 final} - {SWD(2025) 317 final} - {SWD(2025) 318 final} - {SWD(2025) 319 final} - {SWD(2025) 320 final} - {SWD(2025) 321 final} - {SWD(2025) 322 final} - {SWD(2025) 323 final} - {SWD(2025) 324 final} - {SWD(2025) 325 final} - {SWD(2025) 326 final}

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Executive summary

In May 2016, the European Commission launched the Environmental Implementation Review (EIR), a regular reporting tool based on analysis, dialogue and collaboration with EU Member States to improve the implementation of existing EU environmental policy and legislation ([1]). Following previous cycles in 2017, 2019 and 2022, this report assesses the progress made while describing the main outstanding challenges and opportunities regarding environmental legal implementation in Greece. The purpose of this report is to provide information on the implementation performance and highlight the most effective ways to address the implementation gaps that impact human health and the environment and hamper the economic development and competitiveness of the country. The report relies on detailed sectoral implementation reports collected or issued by the Commission under specific environmental legislation.

The main challenges set out below have been selected from Part I of this report, 'Thematic areas', taking into consideration factors such as the gravity of the environmental implementation issue in light of the impact on the quality of life of citizens, the distance to target and financial implications. In Greece, such challenges have been lingering since the first EIR in 2017 and require urgent action.

Urgent actions for and investments in **waste management** and the **circular economy** are needed to move away from Greece's reliance on waste disposal in landfills (including illegal ones), which remains significant. The number of illegal landfills in operation or in need of rehabilitation has continued to decrease over the years. However, the remaining illegal landfills will be difficult to close unless new facilities are built, while keeping in mind that overcapacity of treatment facilities of residual waste will not help Greece's transition towards a circular economy. Greece will continue to pay fines until this is achieved. Greece also has to step up its efforts to put in place a adequate network of facilities that can effectively manage all the hazardous waste produced in the country. Greece will continue to pay fines until this is achieved. Greece missed the 2020 target to recycle 50 % of its municipal waste by a great margin and is on a course to miss the 2025 targets of a 55 % recycling rate for municipal waste and a 65 % recycling rate for all packaging waste. While the national waste management plan has been updated, the regional plans, which are necessary for implementing waste management policies in practice, have been significantly delayed.

On **urban wastewater treatment**, some positive steps have been taken, such as the systematic assessment and strategic reorganisation of the country's investment needs. However, there are significant delays in the projects that need to be carried out, particularly in the agglomerations (i.e. population centres or places of economic activity) in eastern Attica, for which Greece has been paying fines for several years.

Since 2014, Greece has paid more than EUR 184 million in fines imposed by the Court of Justice of the European Union for violations of EU waste and urban wastewater norms.

On **nature protection**, Greece's Natura 2000 network is now considered completed. Nevertheless, site-specific conservation objectives have not been put in place fully due to insufficient data, while measures are lacking completely. Moreover, management plans are lacking and the percentage of habitats in good condition has decreased over the years. A major challenge to protect and manage Natura 2000 sites effectively in Greece was the set-up of a national system for the comprehensive management, administration and functioning of protected areas. The law that established the Natural Environment and Climate Change Agency and put in place management bodies for all Natura 2000 sites has provided significant benefits in this respect.

The overall **environmental investment needs** to enable Greece to meet its objectives in the main environmental areas is EUR 5.3 billion per year, broken down as follows: support to biodiversity and ecosystems, EUR 2.1 billion per year; pollution prevention and control, EUR 1.3 billion per year; circular economy, EUR 1.1 billion per year; and water, EUR 0.9 billion per year. To meet its four environmental objectives beyond climate change, the additional investment need over the current levels (i.e. the gap) reaches an estimated EUR 2.3 billion per year in Greece, representing around 1.12 % of the national gross domestic product, being lower than the EU average (0.77 %).

On **environmental governance**, Greece still needs to step up efforts regarding the data available on the level of participation in decision-making processes, including authorisations linked to the Environmental Impact Assessment Directive (Directive 2011/92/EU) and the

([1]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Delivering the benefits of EU environmental policies through a regular environmental implementation review, COM(2016) 316 final of 27 May 2016, http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2016%3A316%3AFIN.

Strategic Environmental Assessment Directive (Directive 2001/42/EC).

On **the positive side**, Greece has invested significant efforts in awareness raising and training (e.g. under the Financial Instrument for the Environment Plus Regulation, the project 'Promote financial instruments for liability on the environment' and a pilot Environmental Liability Directive training workshop with the Commission). Greece also has an excellent record under the Bathing Water Directive: 95.8 % of Greek bathing waters are of excellent quality.

Part I: Thematic areas

1. Circular economy and waste management

Transitioning to a circular economy

Advancing the transition to a circular economy in the EU will reduce the environmental and climate impact of our industrial systems by reducing input materials, keeping products and materials in the loop for longer and reducing waste generation, thus decoupling economic growth from resource consumption. A circular economy has considerable potential to increase competitiveness and job creation and will also promote innovation and provide access to new markets. With the 2020 circular economy action plan (CEAP) ([2]) measures either in place or legislatively advanced, Member States will now have to focus on a swift and effective implementation.

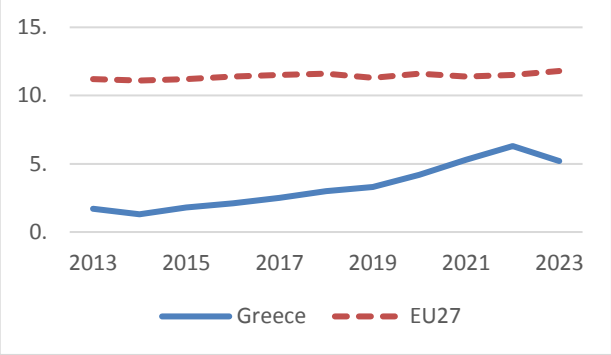
The 2020 CEAP launched the legislative process for a set of initiatives that will now have to be implemented by national governments across the EU. These initiatives were all introduced following a holistic life-cycle approach, with measures addressing the different stages of a product's life cycle, from design through use to end of life.

In the CEAP, the EU sets as its overarching objective the doubling of its circular material use rate (CMUR) by 2030.

The CMUR is a measure of one aspect of circularity: the share of the total amount of material used in the economy that is accounted for by recycled waste. A higher CMUR value means that more secondary materials were used as a substitute for raw materials, thus reducing the environmental impacts of extracting primary material.

Greece's circular use of materials increased up until 2022, when it peaked at 6.3 %, but then declined, reaching 5.2 % in 2023, well below the EU average of 11.8 %.

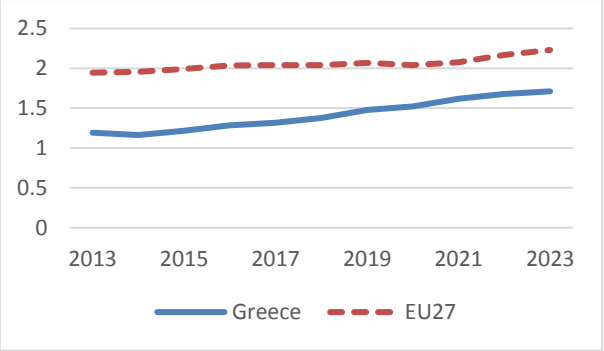
Figure 1: CMUR (%), 2013–2023



Source: Eurostat, 'Circular material use rate', env_ac_cur, last updated 13 November 2024, accessed 10 December 2024, https://ec.europa.eu/eurostat/databrowser/product/view/env_ac_cur.

Resource productivity measures the total amount of materials directly used by an economy in relation to gross domestic product (GDP). Improving resource productivity can help to minimise negative impacts on the environment and reduce dependency on volatile raw material markets. As shown in Figure 2, with EUR 1.71 generated per kg of material consumed in 2023, Greece's resource productivity is slightly below the EU average of EUR 2.22 per kg. However, with the steady increase in its resource productivity over the last decade, Greece follows an encouraging trend.

Figure 2: Resource productivity (EUR/kg), 2013–2023



NB: The unit of measurement used is EUR/kg chain-linked volume (2015). Chain-linked volumes focus on changes on quantities and prices of commodities in previous years, taking account of inflation, and are indexed to the nearest appropriate year, in this case 2015.

([2]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – A new circular economy action plan for a cleaner and more competitive Europe, COM(2020) 98 final of 11 March 2020, https://eur-lex.europa.eu/legal-content/FR/TXT/?uri=CELEX:52020DC0098.

Source: Eurostat, 'Resource productivity', env_ac_rp, last updated 7 August 2024, accessed 10 December 2024, https://ec.europa.eu/eurostat/databrowser/product/view/env_ac_rp.

Policies and measures

In parallel with European initiatives under the CEAP, Member States are encouraged to adopt and implement circular strategies at the national, regional and city levels. These should be tailored to each national and local reality, to harness the proximity economy's ([3]) potential, while following the principles of a holistic whole-value-chain approach.

Since the launch of the online European Circular Economy Stakeholder Platform in 2017 ([4]) national, regional and local authorities have used the platform to share their strategies, roadmaps and good practices, for example alternative business models and innovative technologies.

In 2022, Greece adopted its new national action plan for circular economy ([5]) for 2021–2025, following the limited results of the 2018 circular economy strategy.

Key initiatives, many of them focusing on waste, are being implemented, including revising local waste management plans, implementing a food waste prevention programme and introducing specific actions in lignite-dependent regions. New infrastructure for waste separation, recycling and recovery is going to be financed, alongside economic incentives like extended producer responsibility (EPR) schemes for various waste streams and a deposit refund system for beverage bottles.

Additional measures include environmental fees for single-use plastics, tax incentives for product donations and standardised recycling processes. The government will also support municipalities through technical platforms and guides on circular practices, including pay-as-you-throw" (PAYT) schemes.

Green public procurement

Public procurement accounts for a large proportion of European consumption, with public authorities' purchasing power representing around 14 % of EU GDP. Public procurement using green or circular criteria (life-cycle analysis, PaaS (platform as a service), second hand) can help drive the demand for sustainable products that meet reparability and recyclability standards.

Greece adopted its first green public procurement (GPP) action plan in 2021, which was revised in July 2024 ([6]). The action plan recommends that all public authorities use EU GPP criteria when procuring goods, services and public work. It also sets mandatory and non-mandatory targets to use EU GPP criteria in 15 categories of products and services. Mandatory targets are set for eight product categories (copying and graphic paper, computers and monitors, interior lighting, air conditioning equipment, lubricants, road transport vehicles and services, and road lighting and traffic signals). Setting up a monitoring system for green, sustainable and/or innovative public procurement remains a key priority for 2025.

The EU Ecolabel and the eco-management and audit scheme

The number of EU Ecolabel product groups and the number of eco-management and audit scheme (EMAS)-licensed organisations in each country provide some indication of the extent to which the private sector and national stakeholders in that country are actively engaged in the transition to a circular economy. The EU Ecolabel is awarded to products with best-in-class environmental performance. EMAS is a voluntary environment management scheme aimed at reducing the environmental impacts of organisations.

As of September 2024, Greece had 4 614 products out of 98 977 and 20 licences out of 2 983 registered in the EU Ecolabel scheme, which places its EMAS take-up on the low side in the EU ([7]). Moreover, 38 organisations from Greece are currently registered in EMAS, 3 more than in 2021 ([8]).

Greece's CMUR decreased by 1.1 percentage points between 2022 and 2023. This represents no progress towards the 2022 priority action to take measures to increase the CMUR.

Greece has been implementing its circular economy policy framework's initiatives, has identified the main barriers to implementation and is addressing these

([3]) European Commission, 'Proximity and social economy ecosystem', European Commission website, https://single-market-economy.ec.europa.eu/sectors/proximity-and-social-economy_en.

([4]) Circular Economy Stakeholder Platform (https://circulareconomy.europa.eu/platform/en/strategies).

([5]) For more information on the Greek CEAP, see the Circular Greece website (https://circulargreece.gr/legislative-framework/#:~:text=The%20National%20Action%20Plan%20for,at%20the%20same%20time%20competitive).

([6]) https://gge.mindev.gov.gr/tomeas-dimosion-simvaseon/ethniko-sxedio-drasis-prasines-dimosies-simvaseis/.

([7]) European Commission, 'EU Ecolabel facts and figures', European Commission website, accessed 27 January 2025, http://ec.europa.eu/environment/ecolabel/facts-and-figures.html.

([8]) As of October 2021. European Commission, 'EMAS Register – Published organisations', EMAS Register website, accessed 27 January 2024, https://webgate.ec.europa.eu/emas2/public/registration/list.

barriers. Based on this, accelerated efforts – not solely focused on waste – are suggested.

2025 priority action

- Adopt measures to increase the circular material use rate.

Waste management

Turning waste into a resource is supported by:

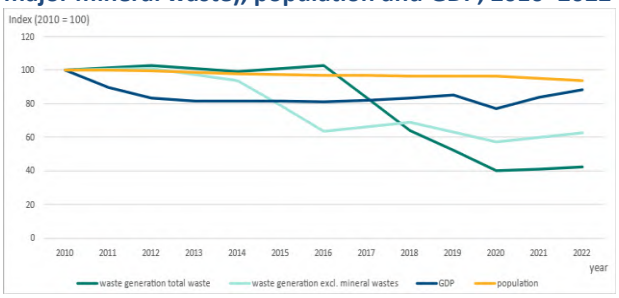
(i) addressing the full life cycle of products, from conception to end of life, by setting requirements on the design of products to ensure that they are more sustainable;
(ii) fully implementing EU waste legislation, which includes the waste hierarchy, the obligation to ensure separate collection of waste, landfill diversion targets, etc.;
(iii) reducing waste generation per capita and in absolute terms;
(iv) increasing the recycling rates of waste containing critical raw materials (CRMs), with a view to reducing dependencies and building resilient value chains, and stimulating demand for recycled content in all products;
(v) limiting energy recovery to non-recyclable materials; and
(vi) phasing out landfilling of recyclable or recoverable waste.

One of the main objectives of the EU Waste Law is to decouple economic growth from its environmental impacts.

The EU's approach to waste management is based on the waste treatment hierarchy: prevention, preparing for reuse, recycling, recovery and, as the least preferred option, disposal (which includes landfilling and incineration without energy recovery).

All legislative proposals in the field of waste management put forward by the Commission since 2021 are intended to encourage Member States to promote better product design, to require producers to cover the costs of managing the waste resulting from their products and to ensure that waste is managed at the higher levels of the waste hierarchy.

Figure 3: Generation of waste (total and excluding major mineral waste), population and GDP, 2010–2022



Sources: Eurostat, 'GDP and main components (output, expenditure and income)', nama_10_gdp, accessed 15 October 2024, https://ec.europa.eu/eurostat/databrowser/view/nama_10_gdp__custom_9301905/default/table; Eurostat, 'Generation of waste by waste category, hazardousness and NACE Rev. 2 activity', env_wasgen, last updated 30 September 2024, accessed 22 October 2024, https://ec.europa.eu/eurostat/databrowser/view/env_wasgen/default/table?lang=en; Eurostat, 'Population change – Demographic balance and crude rates at national level', demo_grind, accessed 15 October 2024, https://ec.europa.eu/eurostat/databrowser/view/demo_gind/default/table?lang=en&category=demo.demo_ind.

Critical raw materials

Greece does not seem to have any specific policy on CRMs.

Construction and demolition waste

Construction and demolition waste accounts for almost 40 % of all waste generated in the EU. A recent study ([9]) by the Joint Research Centre shows that recycling and preparation for reuse are preferred over incineration and landfilling from an environmental perspective for most of the different streams of construction and demolition waste. However, the economics are often unfavourable for recycling and preparation for reuse compared with incineration and landfilling. If available technology were to be applied, it is estimated that an increase in the recycling and preparation for reuse of construction and demolition waste would lead to an additional 33 Mt of greenhouse gas (GHG) emission savings annually (more than, for example, the combined annual GHG emissions from Estonia, Latvia and Luxembourg).

The rate of recycling and preparation for reuse of mineral construction and demolition waste in Greece in 2022 was 99.6 %, compared with the EU average of 79.8 %. This equates to 2 228 185 t of mineral waste from construction and demolition operations ([10]). In 2020, the

([9]) European Commission: Joint Research Centre, Cristobal Garcia, J., Caro, D. et al., *Techno-economic and environmental assessment of construction and demolition waste management in the European Union*, Publications Office of the European Union, Luxembourg, 2024, https://publications.jrc.ec.europa.eu/repository/handle/JRC135470.

([10]) European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, *EU Construction & Demolition Waste Management Protocol including guidelines for pre-demolition and pre-renovation audits of construction works – Updated edition 2024*, Publications Office of the European Union, Luxembourg, 2024,

claimed recycling rate for mineral waste from construction and demolition operations was 100 %.

Boosting implementation – the 2023 Waste Early Warning Report

This section focuses on the management of municipal waste ([11]), for which EU law sets mandatory recycling targets. In June 2023, the Commission published the *Waste Early Warning Report* ([12]) identifying the general trends in waste management and the Member States at risk of missing 2025 waste targets (see Figure 4). Greece is at risk of missing both the municipal waste target and the packaging waste target. Greece is also at risk of not meeting the 2035 target of having a maximum of 10 % of municipal waste landfilled.

Figure 4: Member States' prospects of meeting the preparing for reuse and recycling targets for municipal waste and packaging waste

- Member States not at risk of missing the 55 % preparing for reuse and recycling target for municipal waste and the 65 % recycling target for packaging waste
- Member States at risk of missing the preparing for reuse and recycling target for municipal waste but not at risk of missing the recycling target for packaging waste
- Member States at risk of missing both targets
- Outside coverage

Source: European Environment Agency (EEA), 'Many EU Member States not on track to meet recycling targets for municipal waste and packaging waste', briefing No 28/2022, Copenhagen, 2023. Reference data © ESRI.

Under certain conditions, EU waste legislation enables some Member States to postpone the deadlines for reaching certain waste management targets for municipal and packaging waste. Member States that want to use this possibility have to notify the Commission 24 months in advance of the deadline and submit an implementation plan laying down the steps they envisage to reach the postponed targets within a new timeframe. Regarding the 2025 targets, 11 Member States, including Greece, have used this prerogative.

On 29 December 2023, Greece notified the Commission of its intention to postpone the attainment of the preparing for reuse and recycling target for municipal waste established by the Waste Framework Directive for 2025. In addition, Greece notified the Commission of its intention to postpone the attainment of the recycling target for plastic and glass packaging waste established by the Packaging and Packaging Waste Directive for 2025. Attached to these notifications, Greece submitted an implementation plan laying down the measures necessary to attain the targets within the postponed time frame (i.e. by 2030 instead of 2025). According to the implementation plan, the main measures Greece will put in place include the closure of the remaining illegal landfills, the strengthening of a separate collection network for recyclable materials and biowaste and the implementation of a packaging deposit return system.

In the *Waste Early Warning Report*, the Commission recommended that Member States accelerate their efforts to improve their recycling performance. The Commission is, on one hand, working together with the national authorities and stakeholders to speed up the implementation of measures necessary to meet the targets, including through dedicated financing. On the other hand, the Commission is pursuing enforcement actions against those Member States that, based on data submitted to the Commission, do not achieve the targets of the Waste Framework Directive ([13]), the Packaging and

https://op.europa.eu/en/publication-detail/-/publication/d63d5a8f-64e8-11ef-a8ba-01aa75ed71a1/language-en; European Commission, Circular Economy – Principles for buildings design, Brussels, 2020, https://ec.europa.eu/docsroom/documents/39984.

([11]) Municipal waste consists of (i) mixed waste and separately collected waste from households, including paper and cardboard, glass, metals, plastics, biowaste, wood, textiles, packaging, waste electrical and electronic equipment, waste batteries and accumulators, and bulky waste, including mattresses and furniture; and (ii) mixed waste and separately collected waste from other sources, where such waste is similar in nature and composition to waste from households (Directive 2008/98/EC, Article 3.2b).

([12]) https://environment.ec.europa.eu/publications/waste-early-warning-report_en.

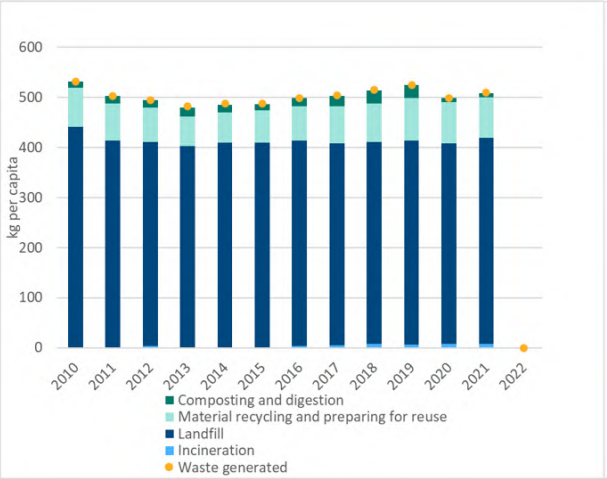
([13]) Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain

Packaging Waste Directive ([14]) and the Directive on Waste Electrical and Electronic Equipment (WEEE) ([15]).

Municipal waste

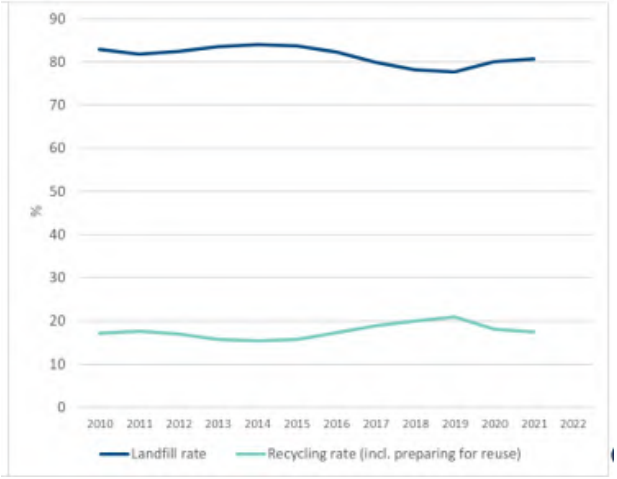
Municipal waste generation in Greece stagnated between 2010 and 2021 (Figure 5). In 2021, the country generated 509 kg per capita of municipal waste, which is very close to the estimated EU-27 average of 527 kg per capita in the same year.

Figure 5: Municipal waste management and recycling (including preparation for reuse), 2010–2022



Source: Eurostat, 'Municipal waste by waste management operations', env_wasmun, accessed 22 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASMUN/default/table.

Figure 6: Recycling (including preparation for reuse) and landfill rates (%), 2010–2022



NB: Data for 2022 are not available. As of reference year 2020, new reporting rules apply to calculating recycled municipal waste pursuant to the targets laid down in Article 11(2)(c–e) of Directive 2008/98/EC. Greece has applied the new reporting rules since reference year 2020 (Hellenic Ministry of Environment and Energy, 2024).

Source: Eurostat, 'Municipal waste by waste management operations', env_wasmun, accessed 22 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASMUN/default/table.

The municipal waste recycling rate in Greece remained low over the period covered (Figure 6). In 2021, the recycling rate was 17 %, which is significantly below the estimated EU-27 average of 49 % in the same year. The rate of composting and anaerobic digestion also remains very low and stagnating in Greece, reaching 2 % in 2021. Municipal waste incineration plays a minor role in Greece, at 2 % in 2021, while landfilling is still the dominant treatment method for municipal waste. The landfilling rate has stagnated at the very high level of 80 % (Figure 5).

Greece has also reported data to show compliance with the preparing for reuse and recycling target of 55 % for 2025, as set out in the Waste Framework Directive. The difference between these (provisional) data, following the reporting obligation of the Waste Framework Directive, and the data shown in Figure 5 (voluntary reporting) was less than 1 percentage point for the preparing for reuse and recycling rate in 2021 (Eurostat).

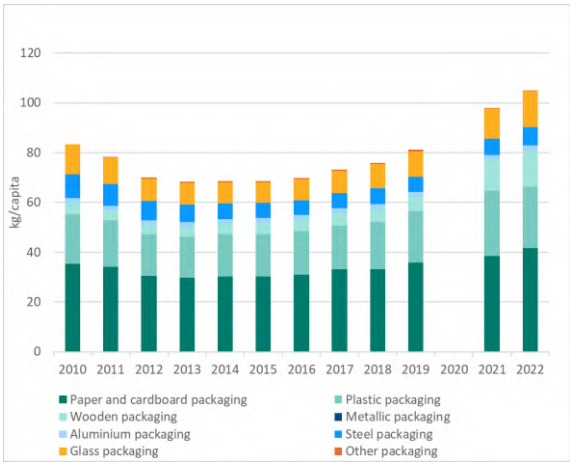
Directives, Directive - 2008/98 - EN - Waste framework directive - EUR-Lex.

([14]) European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste (OJ L 365, 31/12/1994, p. 10–23), Directive - 94/62 - EN - EUR-Lex.

([15]) Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE) (OJ L 197, 24.7.2012, p. 38), Directive - 2012/19 - EN - EUR-Lex.

Packaging waste

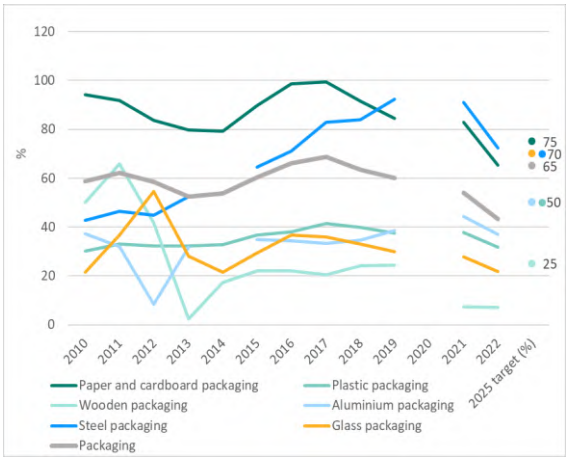
Figure 7: Packaging waste generation, 2010–2022



Source: Eurostat, 'Packaging waste by waste management operations', env_waspac, last updated 23 October 2024, accessed 28 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASPAC__custom_842634/default/table?lang=en.

With regard to packaging, waste generation in Greece decreased between 2010 and 2013 (Figure 7), after which it stabilised. It then increased back to the 2010 level in 2019 and, from 2021 onwards, increased above that. In 2022, the country generated 105 kg per capita of packaging waste, which is significantly below the estimated European average of 186 kg per capita in the same year ([16]). It should be noted that the estimation of generated packaging waste in Greece might be missing quantities generated due to the *de minimis* rule, online sales and free riders. As a result, the generated quantities might in fact be higher than reported, which could also affect the recycling rate ([17]).

Figure 8: Packaging waste recycling rates (%), 2010–2022



NB: Data for 2020 are still under validation at Eurostat. As of reference year 2020, the rules for calculating recycled packaging waste have changed, pursuant to Article 6a of Directive 94/62/EC. Greece has applied the new calculation rules since reference year 2020 (Hellenic Ministry of Environment and Energy, 2024).

Source: Eurostat, 'Packaging waste by waste management operations', env_waspac, last updated 23 October 2024, accessed 28 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASPAC__custom_842634/default/table?lang=en.

The overall packaging waste recycling rate in Greece was rather stable at around 60 % until 2019 (Figure 8). However, in 2022 it dropped significantly to 43 %, which is significantly below the (estimated) EU-27 average of 65 % in the same year. This drop is due to the lack of verified data on industrial and commercial packaging from two producer responsibility organisations. These volumes are therefore not included in the recycling volumes, which has affected the recycling rates of all materials (Eurostat, 2024).

In 2021 and 2022, Greece recycled 54 % and 43 % of its total packaging waste, respectively. The recycling rates for plastic, aluminium, glass and wooden packaging were clearly below the 2025 targets in both years, while the rates were above the 2025 target for steel packaging. The overall packaging waste recycling rate is mainly driven by paper and cardboard and plastic packaging waste, as these constitute the largest shares of recyclable waste.

Policies to encourage waste prevention

Waste management plans and waste prevention programmes are instrumental to the full implementation of EU waste legislation. They set out key provisions and investments to ensure compliance with existing and new legal requirements (e.g. on waste prevention, on separate collection for certain waste streams, on recycling and on landfill targets).

The Greek national waste prevention programme (NWPP) is a stand-alone strategic document and addresses 2021–2030 (EEA, 2023b). The programme is expected to be partly financed through the EU Structural and Investment Funds for the 2021–2027 programming period, in combination with specific funding for waste prevention and management. There is, however, no indication of a specific budget in the NWPP. Examples of objectives targeting waste prevention outlined in the programme are:

- promoting circular consumption, raising awareness and providing tools for citizens to transition from a linear to a circular model of behaviour and consumption;

([16]) The EU average might have been influenced by not all Member States fully applying the reporting rules for packaging waste set out in Commission Implementing Decision (EU) 2019/665.

([17]) https://environment.ec.europa.eu/publications/waste-early-warning-report_en.

- setting waste reduction targets for specific waste streams;
- encouraging the perception of waste as a resource within the broader context of the circular economy;
- strengthening waste prevention efforts through an integrated and systematic public awareness campaign;
- developing and promoting a new industrial strategy to transform circularity in the production process.

The prioritised waste streams include food waste, paper waste, packaging waste (specifying different types of plastic), WEEE, textile waste, bulky waste, industrial waste and waste generated from excavation, construction and demolition activities. The NWPP establishes two quantitative targets, in line with those established in Law No 4819/2021: to reduce food waste per capita by 30 % from 2022 to 2030, at the retail and consumer levels, and to reduce the utilisation of single-use plastic cups for beverages and food by 30 % in 2024 and 60 % in 2026, relative to the levels in 2022 (EEA, 2023b). To achieve these targets, various financial incentives will be used in combination with the promotion of research and development and the implementation of awareness-raising campaigns (Government of Greece, 2022).

Measures for waste prevention include several initiatives promoting and strengthening collection networks for textiles and furniture no longer suitable for their original use – for instance, by investigating EPR schemes. Additionally, there is a focus on promoting the utilisation of used electronics in both private and public procurement, along with providing financial incentives for the repair and reuse of electrical and electronic equipment. Furthermore, the NWPP encourages the development of reuse practices for construction materials and limiting the use of certain packaging materials to promote designing for reuse and recycling, among other initiatives (Government of Greece, 2022).

Based on a pilot project in West Macedonia, which established three creative reuse centres (CRCs) for materials, Law No 4819/2021 committed Greece to the establishment of more CRCs by the end of 2023: municipalities with more than 20 000 residents are required to establish CRCs to collect used items, including electrical and electronic equipment, toys, furniture, bicycles, books and textiles. In this context, the financial instrument for the environment (LIFE) RE-WEEE (Development and demonstration of waste electrical and electronic equipment (WEEE) prevention and reuse paradigms) project has emerged, which sorts, cleans and repairs or prepares for reuse electric and electronic equipment (LIFE RE-WEEE, 2020; EEA, 2023b). As a follow-up activity to the project, capacity-building seminars started in 2022 in several regions, and a few repair cafes were organised but have not been widely implemented (Hellenic Ministry of Environment and Energy, 2024).

The NWPP includes six main pillars of food waste prevention measures, with several actions for each pillar (Government of Greece, 2022). Since 2022, food-waste-related data have been reported in the Ministry of Environment and Energy's Electronic Waste Registry, in accordance with the provisions of Article 20 of Law No 4819/2021. The first reporting concerns data for 2021, based on Commission Implementing Decision 2019/1597.

To monitor the effectiveness of the NWPP, Greece has established indicators for each prioritised waste stream. The programme will be evaluated every five years and will be revised when necessary and appropriate (EEA, 2023b). The evaluation of the previous programme highlights the pressing need for significant improvements across various areas and indicates that the measures implemented for waste prevention so far are incomplete and lack a comprehensive assessment of their effectiveness. Furthermore, the evaluation stated that several actions have recently been initiated and therefore results have not yet been recorded (EEA, 2023b).

Policies to encourage separate collection and recycling

For recyclables, Greece implements door-to-door commingled collection complemented by low-density bring points, or collection corners at the level of each building block (high-density bring points). However, the separate collection system targets packaging materials only. Most of the household packaging and non-packaging waste is collected co-mingled. For example, printed paper is collected with paper and cardboard, plastic, metal and glass packaging, and sorted at sorting facilities into recyclable materials. Separate collection of biowaste takes place in some municipalities (Hellenic Ministry of Environment and Energy, 2024). Door-to-door separate collection of garden waste is in place everywhere except in rural areas. Textile waste is only collected in cities, using high-density bring points.

The separate collection of non-household packaging waste was not mandatory for all non-household sources. It was, however, mandatory for operators of public gathering areas and for catering companies able to serve over 100 customers. However, Law No 4819/2021 extends the separate collection obligation to non-household waste (ETC/CE, 2022).

Since separate collection in Greece currently delivers only moderate capture rates, there is a need for incentives to enhance separation at the source and separate collection. Greece has already made firm plans to improve the situation and several actions were to be

implemented in 2022 and 2023. Separate collection was to be extended regarding the four recyclable waste streams (paper, plastic, glass, and metal) and non-packaging waste was to be included in the system. Schools and government bodies were to collect printed paper and the universal separate collection of biowaste, including food waste, was to be implemented from the end of 2022 by municipalities and private companies (ETC/CE, 2022). However, these improvements are not yet fully implemented (Hellenic Ministry of Environment and Energy, 2024), and more detailed information on the implementation's status is not available. Under cohesion policy 2021-2027, the Greek authorities have adopted the Recycling and Recovery Facility (RRF) model for waste management. Investments in RRFs will be combined with comprehensive and integrated local plans for separate waste collection in each service area.

Greece does not yet apply pay-as-you-throw schemes, but it has firm plans to do so according to the national waste management plan for 2020–2030 (ETC/CE, 2022). Pay-as-you-throw schemes have been made a legislative requirement (Article 37, Law No 4819/2021). The implementation of such schemes is still in its initial stage (Hellenic Ministry of Environment and Energy, 2024).

EPR schemes cover packaging waste from both household and non-household sources for all packaging materials. The system applies advanced fee modulation to plastic packaging (i.e. higher fees for difficult-to-recycle plastic types or combinations of materials) (ETC/CE, 2022). In addition, Greek legislation expects to introduce EPR for several product groups (textiles, agricultural plastics, medicines for household use, matrices, furniture, toys, athletic equipment, light personal electric vehicles and electric bicycles), in addition to those provided for in the Single-use Plastics Directive (Hellenic Ministry of Environment and Energy, 2024).

Greece has packaging taxes for plastic carrier bags, single-use plastic beverage cups and food containers, and packaging products containing polyvinyl chloride (PVC). Greece has no deposit return systems in use, except for systems for glass drink bottles run by private initiatives. A nationwide deposit return system for aluminium, glass and plastic beverage packaging was to be implemented at the beginning of 2023 by beverage packaging producers (ETC/CE, 2022). A legal amendment to introduce a nationwide deposit return system for plastic and metal beverage containers is in process. According to the proposed provisions, the implementation of the system has been postponed until December 2025. The required ministerial decision is expected to be issued by the end of 2024 (Hellenic Ministry of Environment and Energy, 2024).

Policies to discourage landfilling or incineration

Greece applies a landfill tax, with a rate of EUR 20/t as of 2022. This fee is very low and lies considerably below the landfill taxes applied in other Member States. However, the landfill fee increases annually by EUR 5/t, until reaching EUR 55 from 2027 onwards. According to Article 38 of Law No 4819/2021, the revenues will be used to finance waste prevention, separate collection and recycling measures of municipalities and waste management bodies, and research and technologies for recycling and waste. There is no landfill ban at the moment but, since the beginning of 2024, it has been prohibited to landfill textiles, electrical electronic equipment, products used for daily hygiene, footwear and books unsuitable for sale or use unless it can be proved that all other waste hierarchy options have been applied to the extent possible (ETC/CE, 2022; EEA, 2023a; Hellenic Ministry of Environment and Energy, 2024).

There are no incineration taxes in Greece, as there are no incineration facilities in the country. Greece currently does not export waste for incineration.

Until recently, the combination of a low landfill fee and cheap illegal landfills had not created any incentive to enhance recycling (ETC/CE, 2022).

In 2001, the Commission launched an infringement case and asked Greece to close and rehabilitate all the illegal landfills that continue to operate in the country. In 2014, the Court of Justice of the European Union (CJEU) imposed financial sanctions on Greece, as it had still not complied. Greece continues to pay fines on a semestrial basis (EUR 72 million to date) ([18]). In 2003, the Commission launched an infringement case and asked Greece to ensure that all its hazardous waste is properly treated. In 2016, the CJEU imposed financial sanctions on Greece, as it had still not complied. Greece continues to pay fines on a semestrial basis (EUR 72 million to date) ([19]). In 2021, the Commission launched an infringement case and asked Greece to ensure that all waste is subject to adequate treatment before being landfilled and to establish an integrated and adequate network of waste disposal installations for mixed municipal waste. The continuous non-compliance with the rulings of the CJEU is an indication of systemic weaknesses in the Member State's administrative system.

Greece has made no progress in addressing the issues of the closure and rehabilitation of illegal landfills and of the treatment of hazardous waste as matters of absolute

([18]) INFR(2001)2273.

([19]) INFR(2003)2187.

priority. It has also made no progress in avoiding building excessive infrastructure for the treatment of residual waste. Greece made some progress in improving and extending the separate collection of waste, including biowaste. The country also made some progress in increasing and enforcing landfill taxes and channelling those revenues towards measures that improve waste management in line with the waste hierarchy. Finally, Greece made some progress in improving the efficiency of the EPR systems, in line with the general minimum requirements on EPR, and in ensuring that regional waste management plans are in place and in line with the revised Waste Framework Directive.

2025 priority actions

- Implement, harmonise, and gradually increase landfill taxes to phase out landfilling of recyclable and recoverable waste.
- Complete closure of non-compliant landfills.
- Improve separate collection at source e.g. through economic instruments, investing in infrastructure for separate collection, sorting and recycling, and increasing public awareness.
- Increase reuse of products and scale up waste recycling infrastructure associated with the higher steps of the waste hierarchy. In particular, improve collection and increase treatment capacity for bio-waste.
- Increase the recycling rates of packaging waste.
- Increase the collection and recycling rate of waste electronic and electric equipment (WEEE).
- Improve the system for managing the quality of data on packaging waste in order to build coherent and verifiable data sets.
- Invest in waste prevention measures to reduce the total amount of waste generated.
- Ensure the achievement of the 2025 waste targets, following the recommendations made by the Commission in the Early Warning Reports where applicable.

2. Biodiversity and natural capital

Global and EU biodiversity frameworks

Biological diversity and healthy ecosystems are critical for our societies, underpin our economies and well-being and are essential for climate change adaptation and mitigation. The Kunming–Montreal global biodiversity framework (GBF), adopted in December 2022, sets comprehensive and measurable targets to tackle biodiversity loss by 2030. To implement this global framework and integrate biodiversity considerations into national decision-making, the EU – as well as all Member States – had to submit national biodiversity strategies and action plans (NBSAPs), or to communicate national targets aligned with the global targets, by the end of 2024. The EU biodiversity strategy for 2030 (BDS) aims to put EU biodiversity on a path to recovery by 2030. It sets quantified targets intended to protect and restore nature and manage ecosystems in a sustainable manner, as well as measures to enable implementation and commitments to support global biodiversity. A BDS actions tracker ([20]) and a dashboard of indicators ([21]) provide information on implementation progress. The recently adopted EU Nature Restoration Regulation ([22]) is the first EU-wide, comprehensive law of its kind and a key instrument for the EU to deliver on the global biodiversity targets for 2030. It lays down an overarching objective at the EU level to put in place effective restoration measures on 20 % of EU land and sea by 2030 and for all ecosystems in need of restoration by 2050. To achieve this, it sets binding targets for Member States to restore and maintain ecosystems, as well as an effective implementation framework based on national restoration plans.

The BDS is the main instrument used by the EU to deliver on its obligation under the GBF. The Commission has submitted to the Convention on Biological Diversity (CBD) its report on GBF-aligned EU targets that stem from the BDS and from other policy instruments under the European Green Deal.

Member States' NBSAPs need to provide coherent frameworks for national delivery on the global and EU 2030 biodiversity targets. In line with the global obligations, NBSAPs should also include a biodiversity financing plan and a capacity-building plan, based on needs assessments, as well as an overview of the national indicators used to measure progress.

Greece has not yet submitted to the CBD an updated NBSAP or aligned national targets.

The EU aims to allocate at least 7.5 % of annual spending under the EU budget to biodiversity objectives in 2024, rising to 10 % in 2026 and 2027. For details on biodiversity financing and investments for Greece, see 'Biodiversity and ecosystems' in Chapter 5.

2025 priority action

- Submit to the CBD an updated NBSAP or national targets following the adoption of the Kunming-Montreal Global Biodiversity Framework.

Nature protection and restoration – Natura 2000

Natura 2000 ([23]), the largest coordinated network of protected areas in the world, is key to the achievement of the objectives set out in the Birds and Habitats Directives. These objectives are to ensure the long-term protection, conservation and survival of Europe's most valuable and threatened species and habitats and the ecosystems they underpin. Key milestones towards meeting the objectives of the Birds and Habitats Directives are (i) the setting up of a complete and coherent Natura 2000 network; (ii) the designation of sites of community importance (SCIs) as special areas of conservation (SACs) ([24]); and (iii) effective management of all Natura 2000 sites through the setting of site-specific conservation objectives and measures.

([20]) EU Biodiversity Strategy Actions Tracker (https://dopa.jrc.ec.europa.eu/kcbd/actions-tracker/).

([21]) EU Biodiversity Strategy Dashboard (https://dopa.jrc.ec.europa.eu/kcbd/EUBDS2030-dashboard/?version=1).

([22]) Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024), http://data.europa.eu/eli/reg/2024/1991/oj; see also the Commission web page on the law (https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en).

([23]) Natura 2000 comprises sites of community importance (SCIs), designated pursuant to the Habitats Directive, as well as special protection areas (SPAs), classified pursuant to the Birds Directive. Numbers of protected areas in Figure 9 do not add up to the total of SCIs plus SPAs, because some SCIs and SPAs overlap. An SAC is an SCI designated by a Member State.

([24]) SCIs are designated pursuant to the Habitats Directive, whereas SPAs are designated pursuant to the Birds Directive. Figures of coverage do not add up because some SCIs and SPAs overlap.

Setting up a complete and coherent network of Natura 2000 sites

The setting up of a complete and coherent network of Natura 2000 sites is a cornerstone of the EU's international commitments, under the BDS and GBF, to legally protect a minimum of 30 % of its land area and 30 % of its sea area by 2030.

Meeting these commitments requires the full implementation of Article 3 of the Habitats Directive. The Natura 2000 network should represent a complete and coherent ecological network composed of sites hosting natural habitat types and species of community interest. Natura 2000 will enable the natural habitat types and the species' habitats concerned to be maintained or, where appropriate, restored to a favourable conservation status in their natural range.

Greece hosts 89 habitat types ([25]) and 296 species ([26]) covered by the Habitats Directive. The country also hosts populations of 160 bird species listed in the Birds Directive Annex I ([27]).

Greece has designated 446 Natura 2000 sites, including 265 SCIs under the Habitats Directive and 207 special protection areas (SPAs) under the Birds Directive.

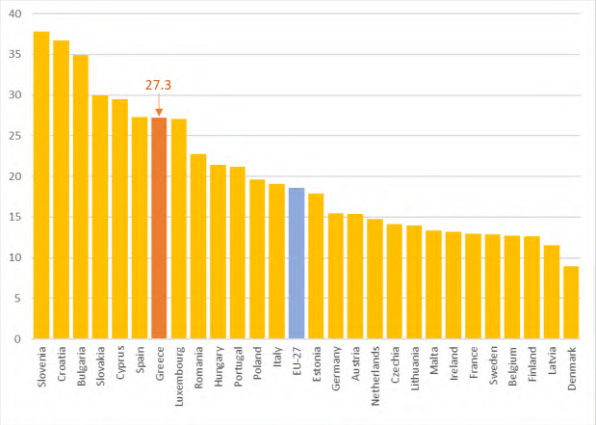
As shown in Figure 9, in 2023, 27.3 % of Greece's land area was covered by Natura 2000 sites (EU coverage: 18.6 %), with SPAs classified under the Birds Directive covering 21 % (EU coverage: 12.8 %) and SCIs under the Habitats Directive covering 16.6 % ([28]) (EU coverage: 14.3 %).

According to the latest assessment of the SCI part of the Natura 2000 network, Greece's Natura 2000 network is now considered to be completed.

Today, the Natura 2000 network covers 18 % of Greece's territorial waters.

Considering both areas covered by Natura 2000 and other nationally designated protected areas, Greece reports that it legally protects 34.6 % of its terrestrial areas (EU-27 coverage: 26.1 %) and 19.8 % of its territorial marine waters (EU-27 coverage: 12.3 %) ([29]).

Figure 9: Natura 2000 terrestrial protected area coverage per Member State (%), 2023



Source: European Environment Agency (EEA), 'Natura 2000 Barometer', 2023 data, accessed March 2025, https://www.eea.europa.eu/data-and-maps/dashboards/natura-2000-barometer.

Designating special areas of conservation and setting site-specific conservation objectives and measures

In order to ensure that SCIs contribute to the objectives of the Habitats Directive, Member States must designate them as SACs, setting site-specific conservation objectives based on the ecological needs of the species and habitats present on the sites. Such site-specific conservation should define attributes and targets that describe the habitats or species' condition as favourable or unfavourable, addressing key pressures and threats . Under Article 6 of the Habitats Directive Member States must establish and implement measures to achieve these objectives. The six-year deadline set by the Habitats Directive to establish appropriate conservation objectives and measures has expired for 239 sites in Greece.

Moreover, site-specific conservation objectives and conservation measures have not been established due to insufficient primary data.

In 2020, the CJEU condemned Greece for not having established the necessary conservation objectives and measures for all Natura 2000 sites designated as

([25]) European Environment Agency (EEA), 'Number of habitats and species per Member State', Article 17 dashboard, Annex I total, 19 December 2019, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/general-information-on-habitats-and-species.

([26]) EEA, 'Number of habitats and species per Member State', Article 17 dashboard, 19 December 2019, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/general-information-on-habitats-and-species.

([27]) EEA, 'Number of bird species/populations per Member State', Article 12 dashboard, Annex I total, last updated 11 May 2023, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-12-national-summary-dashboards/general-information-on-bird-species-populations. This counting only takes into account bird taxa for which information was requested.

([28]) According to the Greek priority action framework (https://ypen.gov.gr/wp-content/uploads/2021/04/PAF-EL_FINAL.pdf) and the Natura 2000 Barometer (https://www.eea.europa.eu/data-and-maps/dashboards/natura-2000-barometer).

([29]) Eurostat dataset env_bio4, 2022 data, accessed 12 March 2025

SACs ([30]). Greece has adopted site-specific conservation objectives. However, for the majority of species and habitats, the objectives are compromised by the lack of data; this indicates that an annual, permanent monitoring system for the conservation status of species and habitats is needed. Greece also still has to set out the necessary conservation measures for the already designated sites. The Ministry of Environment and Energy has commissioned the preparation of 23 special environmental studies and corresponding management plans for the 446 areas in the country's Natura 2000 network, divided into 11 area groups. The national restoration plans will indicate the zones and permitted land uses within their boundaries, in relation to the protected species and habitats in each area group and in harmony with the anthropogenic activities of the wider area. The plans are institutionalised by presidential decrees. Today, only 3 out of the 23 regional restoration plans have been approved in Greece.

Some progress has been made by Greece on the 2022 priority actions, but there is a need to continue working on those to speed up and finalise the work.

2025 priority actions

- Complete Complete the Natura 2000 site designation process.
- Finalise the establishment of site-specific conservation objectives and measures for all Natura 2000 sites (including by adopting their management plans) and ensure their effective implementation.
- Ensure the effective implementation of Natura 2000 management plans and sufficient administrative capacity and financing both for Natura 2000 and the implementation of the Nature Restoration Regulation. Ensure implementation of Prioritised Actions Framework 2021-2027 (PAFs).

Recovery of species

One objective set by the BDS is that, by 2030, there should be no further deterioration in conservation trends or the status of any protected species. The BDS also states that Member States should ensure that at least 30 % of species not currently in favourable conservation status achieve that status or show progress towards doing so (e.g. by exhibiting positive population dynamics or stable or increasing range and habitat size), by 2030. According to the European Environment Agency (EEA), based on reporting required under Article 17 of the Habitats Directive, a quarter of species in the EU were of good conservation status as of 2018 ([31]).

One of the primary objectives of the Habitats Directive is the maintenance of or restoration to favourable conservation status of all species of community interest. Moreover, the Birds Directive also aims to ensure that all wild birds in the EU enjoy a secure status. In order to achieve these objectives, it will be necessary to address key pressures and threats. The Birds Directive and the Habitats Directive lay down a framework of species protection rules and rules on the conservation of habitats and species in order to combat these threats.

Under Article 17 of the Habitats Directive, Member States are required to report on the conservation status of habitats and species every six years. The current reporting cycle, covering the years 2019 to 2024, is due for submission in July 2025. Figures 10 and 11 show the latest available conservation status data.

According to the report submitted by Greece on the conservation status of habitats and species covered by Article 17 of the Habitats Directive for 2013–2018, 48.31 % of habitats were in good conservation status (Figure 10). Of protected species (Figure 11), 35.02 % were in good conservation status. Regarding birds, 77 % of breeding species showed short-term increases or stable population trends (for wintering species, this figure was 50 %).

In the context of the LIFE '4 Natura' integrated project ([32]), 12 action plans have been developed for habitats and species of community interest whose conservation status is considered unsatisfactory and requires rapid improvement. Eight action plans have been adopted so far, while the legal adoption of the remaining four is expected soon.

([30]) Judgment of 17 December 2020, *Commission* v *Greece (Habitats dans la région biogéographique méditerranéenne)*, C-849/19, EU:C:2020:1047.

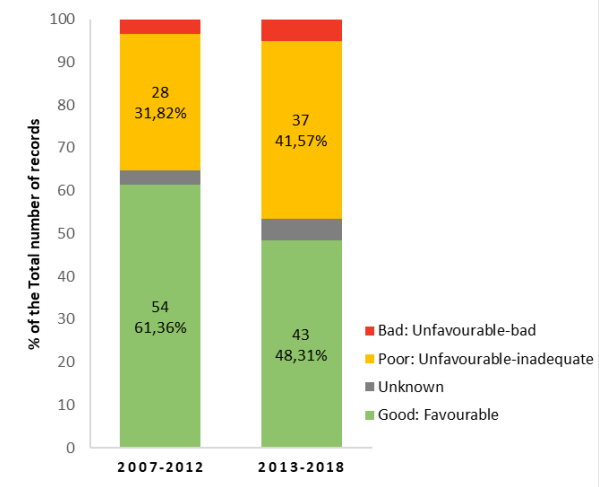
([31]) EEA, *State of Nature in the EU: Results from reporting under the Nature Directives 2013–2018*, Publications Office of the European Union, Luxembourg, 2020, https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020.

([32]) https://edozoume.gr/.

The main pressures and threats for habitats in Greece are related to agriculture, infrastructure development, development and operation of transport systems, alien and problematic species and natural processes ([33]). All of these – together with human-induced changes in water regimes, unknown pressures and pressures from outside the Member State – are also the main pressures affecting species.

The Greek Red List of Threatened Species of Plants, Animals, and Fungi is almost complete, with over 11 000 species having been assessed and classified into threat categories. The Greek Red List is a valuable tool for biodiversity conservation, guiding targeted actions and policies to protect Greek natural heritage and promote sustainable management practices. All species were assessed based on the International Union for Conservation of Nature criteria, while Greek endemic species will be gradually added to the International Union for Conservation of Nature global Red List. The Greek Red List is now accessible to all through its official website that provides public access to scientific knowledge about the country's flora and fauna ([34]).

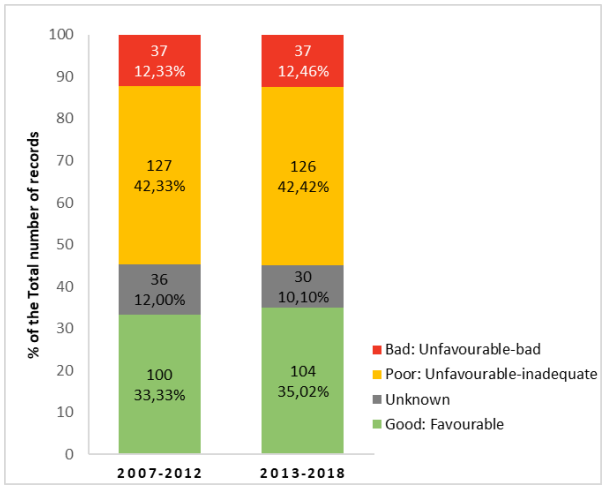
Figure 10: Assessments of conservation status of habitats for the 2007–2012 and 2013–2018 reporting periods



NB: The values shown for 2007–2012 and 2013–2018 are not necessarily directly comparable because changes in area conservation status in a Member State may result from changes to methods or use of better data, rather than reflecting genuine changes.

Source: EEA, 'Conservation status and trends of habitats and species', 19 December 2019, accessed December 2021, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/conservation-status-and-trends.

Figure 11: Assessments of conservation status of species for the 2007–2012 and 2013–2018 reporting periods



NB: The values shown for 2007–2012 and 2013–2018 are not necessarily directly comparable because changes in area conservation status in a Member State may result from changes to methods or use of better data, rather than reflecting genuine changes.

Source: EEA, 'Conservation status and trends of habitats and species', 19 December 2019, accessed December 2021, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/conservation-status-and-trends.

There seems to be a general lack of progress in maintaining or restoring the favourable conservation status of species and habitats protected under the Nature Directives.

A major challenge in protecting and managing Natura 2000 sites effectively has been setting up a national system for the comprehensive management, administration and functioning of protected areas (including strategy, structure, management schemes, responsibilities, financing, enforcement and monitoring), as shown by the fact that Greece still has to execute the above CJEU ruling of 17 December 2020 in Case C-849/19. In May 2020, a central organisation, the Natural Environment and Climate Change Agency (NECCA), was established ([35]). NECCA aims to remedy the situation. All Natura 2000 sites now belong to one of the 24 protected area management units, integrated into NECCA, and comprising the protected area management system at the regional level.

Most of the complaints received point to the following shortcomings: (i) the lack of awareness (among authorities, stakeholders and the public) of Natura 2000 and its benefits and the lack of incentive to invest in promoting these benefits; (ii) the insufficient integration

([33]) https://www.eea.europa.eu/en/analysis/maps-and-charts/main-pressures-and-threats-article-17-national-summary-dashboards-archived.

([34]) www.redlist.necca.gov.gr.

([35]) v. 4685/2020.

of nature protection considerations into other policies; (iii) the lack of management of the sites; (iv) difficulties with enforcing the law; and (v) the lack of proper implementation of Article 6(3) and 6(4) of the Habitats Directive.

The shortcomings are reflected in the two ongoing infringement cases related to (i) the lack of an adequate appropriate assessment under the Habitats Directive concerning wind farm planning at national level (which has impacts on the subsequent authorisation of projects); and (ii) the insufficient protection of species and habitats, including against illegal activities (see the Court ruling of November 2016 ([36]) to ensure adequate protection of the Kyparissia area and the *Caretta caretta* turtle species).

Little progress has been made by Greece on the 2022 priority actions, and there is a need to continue working on those to speed up and finalise the work.

2025 priority actions

- Enhance efforts to collect reliable data on the conservation status of habitats and species as well as their occurrence at site level. In view of this, consider the creation of a body in charge of monitoring and reporting, to ensure that data are not provided only ad hoc on a contract basis.

Recovery of ecosystems

Agricultural ecosystems

The BDS works alongside the common agricultural policy (CAP) to support the transition to sustainable agriculture.

The strategy has set five common agriculture-related targets for 2030, namely to:

— reduce by 50 % the overall use of – and risk from – chemical pesticides;
— reduce by 50 % the use of more hazardous pesticides;
— reduce by 50 % losses of nutrients from fertilisers (which will result in a 20 % reduction in the use of fertilisers) while ensuring that there is no deterioration of soil fertility;
— restore at least 10 % of agricultural area to have high-diversity landscape features; and
— increase the area under organic farming to at least 25 %.

The "Vision for agriculture and food" ([37]), adopted by the European Commission in February 2025, sets a roadmap to an agri-food system that is attractive, competitive, sustainable and fair for current and future generations. To ensure a sustainable future for EU agriculture, it is crucial that these four priority areas are pursued together, and that public and private support are adequately targeted toward this objective.

The CAP and national CAP strategic plans are key instruments to facilitate and strengthen the efforts of European farmers to protect biodiversity and the environment at large. The Commission approved Member States' CAP strategic plans in 2022 for the programming period 2023-2027. The CAP is the largest source of funding dedicated to supporting biodiversity and plays a significant role in implementing EU environmental policy. Strategic plans should continue to support the protection of soil, water, air quality and biodiversity.

While certain CAP result indicators focus on the national measures favouring sustainable agriculture practices that regenerate ecosystems, the impact of these measures is difficult to assess. The uptake of the eco-schemes is voluntary for farmers.

The utilised agricultural area in Greece increased from 5 134 710 ha in 2012 to 5 406 720 ha in 2014, and then decreased to 5 371 560 ha in 2022 ([38]).

Landscape features are small fragments of non-productive and typically – but not exclusively – semi-natural vegetation present in or adjacent to agricultural land. They provide ecosystem services and support for biodiversity. The indicator 'share of agricultural land covered with landscape features' is the ratio between the area covered by landscape features and the area covered by agricultural land. Based on the Land Use/Cover Area Frame Survey landscape features estimates, the share of agricultural land covered by non-productive landscape features in Greece is 7 %, above the EU average. At the EU level, landscape features cover 5.6 % of agricultural land.

In 2024, the CAP basic regulations were amended ([39]) regarding, inter alia, the standards for good agricultural

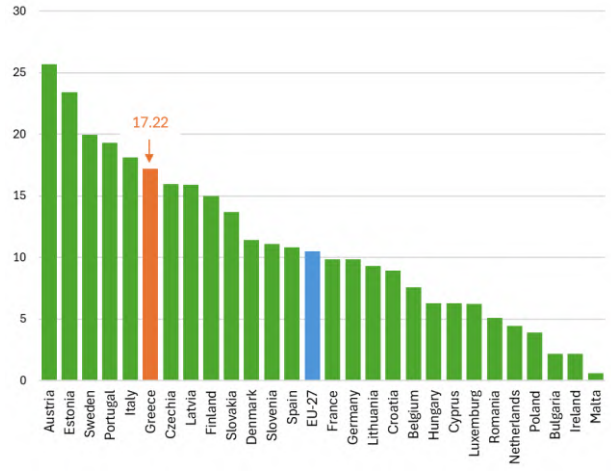
([36]) Judgment of 10 November 2016, *Commission* v *Greece*, C-504/14, EU:C:2016:847.
([37]) https://agriculture.ec.europa.eu/overview-vision-agriculture-food/vision-agriculture-and-food_en
([38]) Eurostat, 'Utilised agricultural area by categories', tag00025, accessed 5 December 2024, https://ec.europa.eu/eurostat/databrowser/view/tag00025/default/table?lang=en.
([39]) Regulation (EU) 2024/1468 of the European Parliament and of the Council of 14 May 2024 amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendment of the CAP strategic plans, review of the CAP strategic plans and exemptions

and environmental condition of land. These changes removed the obligation for farmers benefiting from CAP area-related support to have a minimum share of 3–4 % of non-productive area or landscape features in their farms. The amended regulation set out, however, an obligation for Member States to establish and provide support for eco-schemes covering practices for the maintenance of non-productive areas, such as land lying fallow, and for the establishment of new landscape features on arable land.

The recently adopted Nature Restoration Regulation ([40]) focuses on the restoration of agricultural ecosystems and requires Member States to put in place measures that aim to achieve an increasing trend at the national level in at least two out of three indicators for agricultural ecosystems ([41]). One of these indicators is the 'share of agricultural land with high-diversity landscape features'.

Organic farming practices are highly beneficial to biodiversity. As shown in Figure 12, it is estimated that 17.22 % of Greece's land area is used for organic farming. This is one of the highest levels in the EU and well above the EU average of 10.50 % ([42]). Greece is contributing an above average amount to achieving the target of 25 % of the EU's agricultural land being used for organic farming by 2030.

Figure 12: Share of total utilised agricultural area occupied by organic farming per Member State (%), 2022



Source: Eurostat, 'Area under organic farming', sdg_02_40, accessed 5 December 2024, https://ec.europa.eu/eurostat/databrowser/view/sdg_02_40/default/table?lang=en.

2025 priority actions

- Implement eco-schemes and agri-environmental measures and practices to address the environmental needs of Greece.

Soil ecosystems

Soil is an essential, finite and extremely fragile resource. Its increasing degradation poses a threat to EU food security and climate resilience, adaptation and mitigation.

The EU soil strategy, adopted in November 2021, aims to support soil protection, sustainable soil management and the restoration of degraded soils to achieve the Green Deal objectives as well as land degradation neutrality by 2030.

This entails:

— preventing further soil degradation;
— making sustainable soil management the new normal;
— taking action for ecosystem restoration.

The proposed directive on soil monitoring and resilience ([43]) aims to introduce the first comprehensive legislation on the protection of all soils in the EU. Should the directive be adopted, Member States will have to transpose it into national legislation and implement it, starting with putting in place the governance systems and a sound monitoring framework building on existing national soil monitoring frameworks. The objective of the proposed directive is to provide better and more comparable soil health data with the view of attaining healthy soils by 2050.

Degradation of soil ecosystems encompasses several aspects. The proposed directive requires Member States to assess soil health according to a set of common indicators and to define the necessary regeneration measures. The area of soil that is sealed is an important

from controls and penalties (OJ L, 2024/1468, 24.5.2024), http://data.europa.eu/eli/reg/2024/1468/oj.

([40]) Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024), http://data.europa.eu/eli/reg/2024/1991/oj.

([41]) The three indicators are 'grassland butterfly index', 'stock of organic carbon in cropland mineral soils' and 'share of agricultural land with high-diversity landscape features'.

([42]) This is based on the latest available information from Eurostat, which is currently under review; European Commission, *Agriculture biologique au sein de l'union européenne*, factsheet, Brussels, 2024, https://agriculture.ec.europa.eu/document/download/c67458ed-ec50-4762-ae68-341763ab93c2_fr?filename=factsheet-organic-farming_fr.pdf&prefLang=en.

([43]) Proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law), COM(2023) 416 final of 5 July 2023, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023PC0416.

factor in monitoring land-use change and represents an important pressure on nature and biodiversity. Other soil issues related to land degradation are soil erosion, soil compaction, loss of soil organic carbon, soil contamination, soil salinisation and the presence in soil of nitrogen and phosphorus in excess. The impact assessment accompanying the proposal, which builds on the data available in the EU Soil Observatory, points to the following soil degradation issues in Greece ([44]).

13 % of Greece is affected by loss of soil organic carbon in mineral soils ([45]), representing 83 % of cropland and grassland areas. 11 % of the national territory has a high or very high susceptibility to topsoil compaction, and 10 % of the land experiences unsustainable soil erosion by water, wind, tillage and harvest, representing 60 % of total cropland area.

Grasslands

Grasslands are among the most diverse ecosystems in the EU; they can contain as many as 80 different plant species per square metre and are home to a large variety of animals, ranging from small insects, birds and rodents to large herbivores. Grasslands are essential for agriculture and livestock herding. Natural grasslands also play an important role in storing carbon. However, changes in agricultural practices and land uses have caused grasslands to disappear at an alarming rate, making them one of Europe's most threatened ecosystems.

Greece hosts 10 grassland habitat types ([46]) listed in Annex I to the Habitats Directive. According to data for the latest reporting period (2013–2018), reported under Article 17, the conservation status of four grassland habitats is favourable, another four are deemed of unfavourable – inadequate status and for two grassland habitats the status is unknown ([47]). The main pressures and threats for these habitat types are related to agriculture, infrastructure development, development and operation of transport systems and natural processes (i.e. natural succession following abandonment) ([48]).

Wetlands/peatlands

Wetlands act as water sources and purifiers; they are the planet's greatest natural carbon stores and they are crucial to agriculture and fisheries. Peatlands are a special type of wetlands dominated by peat-forming plants such as *Sphagnum* mosses. Nearly all peatlands in the EU are habitat types listed in Annex I to the Habitats Directive. Drained peatlands under intensive agricultural use constitute only 3 % of the EU's utilised agricultural area. At the same time, they are responsible for 25 % of the GHG emissions from the EU's agricultural sector. Restoring peatlands brings multiple benefits, as peatlands improve water retention and quality, store carbon, reduce GHG emissions and increase biodiversity.

Regarding wetlands, Greece hosts 10 freshwater and coastal habitat types covered by the Habitats Directive ([49]). According to the latest reporting under Article 17, all except two of them have unfavourable conservation status ([50]). The main pressures and threats identified for freshwater and coastal habitat types are infrastructure development, agriculture, pollution, alien and problematic species and human-induced changes to water regimes ([51]).

([44]) Commission staff working document – Impact assessment report: Annexes – Accompanying the proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law), SWD(2023) 417 final of 5 July 2023, https://environment.ec.europa.eu/system/files/2023-07/IMPACT ASSESSMENT REPORT ANNEXES SWD 2023 417 part4.pdf.

([45]) De Rosa, D., Ballabio, C., Lugato, E. et al., 'Soil organic carbon stocks in European croplands and grasslands: How much have we lost in the past decade?', *Global Change Biology*, Vol. 30, No 1, 2024, e16992, https://doi.org/10.1111/gcb.16992.

([46]) These are rupicolous calcareous or basophilic grasslands of the *Alysso-Sedion albi*; alpine and subalpine calcareous grasslands; pseudo-steppe with grasses and annuals of the *Thero-Brachypodietea*; species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas in continental Europe); Pannonic sand steppes; eastern sub-Mediterranean dry grasslands (*Scorzoneratalia villosae*); serpentinophilous grasslands; Oro-Moesian acidophilous grasslands; Mediterranean tall humid grasslands of the *Molinio-Holoschoenion*; Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels; and lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*).

([47]) https://nature-art17.eionet.europa.eu/article17/habitat/report/?period=5&group=Grasslands&country=GR&region=.

([48]) https://www.eea.europa.eu/en/analysis/maps-and-charts/main-pressures-and-threats-article-17-national-summary-dashboards-archived.

([49]) These are oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoeto-Nanojuncetea*, hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp., natural eutrophic lakes with *Magnopotamion*- or *Hydrocharition*-type vegetation, Mediterranean temporary ponds, coastal lagoons, large shallow inlets and bays, *Salicornia* and other annuals colonising mud and sand, Mediterranean salt meadows (*Juncetalia maritimi*), Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*) and halo-nitrophilous scrubs (*Pegano-Salsoletea*).

([50]) https://nature-art17.eionet.europa.eu/article17/habitat/report/?period=5&group=Coastal+habitats&country=GR&region=.

([51]) https://www.eea.europa.eu/en/analysis/maps-and-charts/main-pressures-and-threats-article-17-national-summary-dashboards-archived.

Among bogs, fens and mires, four habitat types listed in Annex I to the Habitats Directive are protected in Greece ([52]). Of these, only one has favourable conservation status (transition mires and quaking bogs) ([53]). Agriculture, development and operation of transport systems, and human-induced changes in water regimes are some of the main pressures for and threats to these habitats ([54]).

Forest ecosystems

Forests are important carbon sinks, and conserving them is vital if the EU is to achieve climate neutrality by 2050. The EU forest strategy for 2030, adopted in July 2021, is a plan of actions to promote the many services that forests provide. Its key objective is to ensure healthy, diverse and resilient EU forests that contribute significantly to the achievement of the EU's biodiversity and climate ambitions. About 27 % of the forest area in the EU is covered by habitat types listed in Annex I to the Habitats Directive. Moreover, forests host several species protected under the Birds and Habitats Directives, including those for which there is a requirement to designate Natura 2000 sites and to protect breeding sites and resting places.

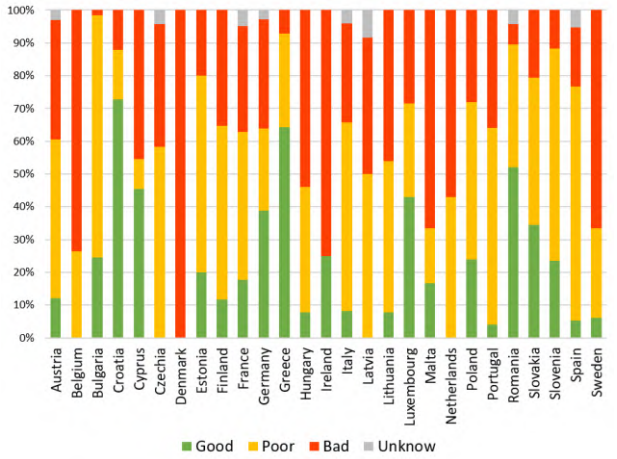
Several Commission guidelines on forestry management were published in 2023. They covered biodiversity-friendly afforestation, reforestation and tree planting; closer-to-nature forest management; and defining, mapping, monitoring and strictly protecting primary and old-growth forests. Further guidance on payment schemes for ecosystems services has also been published.

In 2023, the Commission proposed a new forest monitoring law that aims to create a comprehensive forest knowledge base, address information gaps and enable a better response to growing pressures on forests.

Assessments show that, of the 27 % of EU forest area protected under the Habitats Directive, less than 15 % is of favourable conservation status ([55]). The share of forested areas in the EU with a bad conservation status increased from 27 % in 2015 to 31 % in 2018.

Forests covered 30.3 % of Greece's territory in 2020 ([56]) and more than 30 % of the assessments of EU-protected forest habitats in Greece reveal a bad or poor status ([57]), of which 60 % show an improving trend and the remaining 40 % a constant trend.

Figure 13: Conservation status of forests protected under the Habitats Directive per Member State (% of assessments), 2013–2018



Source: Commission staff working document – New EU forest strategy for 2030, SWD(2021) 652 final of 16 July 2021, p. 24, eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021SC0652

Among forest disturbances contributing to loss of forest integrity and related biodiversity loss, wildfires constitute a particular reason for concern. In 2022, the EU saw a record number (2 700) of wildfires affecting more than 30 ha, which led to the destruction of 785 605 ha of forest, the second highest annual figure recorded. Recent years have also witnessed the occurrence of widespread uncontrollable fires (so-called megafires), which are associated with loss of life and an enormous cost in terms of damage to the environment, businesses and society (over EUR 2 billion annually) and carbon dioxide (CO_2) emissions. Megafires are practically beyond suppression capacity and can be prevented only

([52]) These are transition mires and quaking bogs, calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*, petrifying springs with tufa formation (*Cratoneurion*) and alkaline fens.

([53]) https://nature-art17.eionet.europa.eu/article17/habitat/report/?period=5&group=Bogs%2C+mires+%26+fens&country=GR&region=.

([54]) https://www.eea.europa.eu/en/analysis/maps-and-charts/main-pressures-and-threats-article-17-national-summary-dashboards-archived.

([55]) EEA, *State of Nature in the EU: Results from reporting under the Nature Directives 2013–2018*, Publications Office of the European Union, Luxembourg, 2020, https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020.

([56]) EEA, forest information system for Europe, 'Countries – FISE country factsheets', forest information system for Europe website, https://forest.eea.europa.eu/countries.

([57]) Commission staff working document – Stakeholder consultation and evidence base: Accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – New EU forest strategy for 2030, SWD(2021) 652 final of 16 July 2021, https://eur-lex.europa.eu/legal-content/NL/TXT/?uri=CELEX:52021SC0652.

by an integrated risk management approach. Wildfires prevention is also essential to preserve resources for the bioeconomy.

Greece was the country most affected by wildfires in 2023, with 136 499 ha burnt, the highest amount recorded since 2007. Greece experienced the largest single wildfire recorded in the EU since 2000 near the city of Alexandroupolis, in the East Macedonia, Thrace ([58]).

The EU Timber Regulation (EUTR) ([59]) prohibits the placing on the EU market of illegally harvested timber.

On 29 June 2023, the Regulation on Deforestation-free Products (EUDR) ([60]) entered into force ([61]). The regulation seeks to guarantee that products in the EU that are made using any of seven listed commodities have no links to deforestation. The EUDR repeals the EUTR.

Greece has not implemented the obligations set out in Article 14(1) and (2) of the EUDR to 'designate one or more competent authorities responsible for fulfilling the obligations arising from [this] Regulation' and inform the Commission thereof at the latest by 30 December 2023. This date remains unchanged, and no additional time is expected to be granted, as it is a key element of preparation for the smooth application of the EUDR.

2025 priority action

- Designate the competent authority responsible for fulfilling the obligations arising from the EUDR and inform the Commission of the names, addresses and contact details of said competent authority.

Marine ecosystems

The Marine Strategy Framework Directive (MSFD) requires Member States to achieve good environmental status (GES) for their marine waters. To that end, Member States must draw up marine strategies for their marine waters and cooperate with other Member States sharing the same marine region or subregion. These marine strategies comprise different steps to be developed and implemented over six-year cycles.

Since the 2022 Environmental Implementation Review (EIR) report, no additional data regarding Member States' set of GES characteristics for each descriptor in the MSFD have become available. Nevertheless, Member States have to report updates by 15 October 2024, and these will be assessed by the Commission. In the context of this next round of reporting, in accordance with the MSFD and the Commission GES decision ([62]), Member States must include as part of their set of GES characteristics any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level ([63]).

The Commission assessed the updated monitoring programme reported by Member States in 2020 ([64]). At that time, their updates on the elements, features and parameters identified monitoring gaps. The Commission recommended that Member States should prioritise work to address those gaps at all levels of implementation of the MSFD.

Member States also reported their updated programmes of measures, which are required under Article 13 of the MSFD and which must be updated every six years. The Commission has assessed Member States' programmes of measures.

However, Greece reported its programme of measures with too much delay to be included in the Commission's general assessment of the programmes of measures of the Member States.

2025 priority action

- Report its updates on the state of its marine waters,

([58]) San-Miguel-Ayanz, J., Durrant, T., Boca, R. et al., *Forest fires in Europe, Middle East and North Africa 2023*, Publications Office of the European Union, Luxembourg, 2023.

([59]) Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market (OJ L 295, 12.11.2010, p. 23), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010R0995.

([60]) Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (OJ L 150, 9.6.2023, p. 206), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1115&qid=1687867231461.

([61]) The law will apply to large and medium-sized companies starting on December 30, 2025, and to micro and small enterprises starting on June 30, 2026.

([62]) Commission Decision (EU) 2017/848 of 17 May 2017 laying down criteria and methodological standards on good environmental status of marine waters and specifications and standardised methods for monitoring and assessment, and repealing Decision 2010/477/EU (OJ L 125, 18.5.2017, p. 43), http://data.europa.eu/eli/dec/2017/848/oj.

([63]) Communication from the Commission of 11 March 2024 – Commission notice on the threshold values set under the Marine Strategy Framework Directive (Directive 2008/56/EC) and Commission Decision (EU) 2017/848 (OJ C, C/2024/2078, 11.3.2024), http://data.europa.eu/eli/C/2024/2078/oj.

([64]) https://environment.ec.europa.eu/system/files/2023-04/C_2023_2203_F1_COMMUNICATION_FROM_COMMISSION_EN_V5_P1_2532109.PDF.

its targets and its determinations of GES ([65]) which are expected to include any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level.

Prevention and management of invasive alien species

Invasive alien species (IAS) are a major cause of biodiversity loss in the EU. Besides inflicting direct and indirect damage on nature and the economy, some IAS also carry and spread infectious diseases, posing a threat to humans and wildlife. Regulation (EU) No 1143/2014 (the IAS Regulation) aims to prevent, minimise and mitigate the adverse impacts of IAS on biodiversity. It focuses action on a list of IAS of EU concern (the 'Union list'), which is regularly updated ([66]).

The third update of the Union list ([67]) entered into force on 2 August 2022. The fourth update is in preparation.

Meanwhile, the action plan has been issued for the introduction routes of spatial alien species in Greece ([68]), which concerns the treatment of the introduction of alien species of interest at the most common entry points. It does not concern the management of items that have already entered into the country. For this purpose, management plans will be drawn up per species or group of species. A related joint ministerial decision was issued in 2021 on measures for the implementation of Regulation (EU) No 1143/2014 of the European Parliament and of the Council of 22 October 2014 on the prevention and management of the introduction and spread of IAS. Several studies have been conducted, in particular on marine species.

The IAS Regulation ([69]) currently lists 88 species subject to restrictions on keeping, importing, selling, breeding, growing and releasing into the environment. Member States are required to take measures to (i) prevent the introduction of IAS, (ii) ensure early detection and rapid eradication of IAS and (iii) manage species that are already widespread on their territory.

This aligns with target 6 of the GBF to reduce the introduction of IAS by at least 50 % by 2030 and minimise their impact.

Preventing the introduction and spread of IAS, and managing them, including through eradication and control, can result in a substantial cost saving. Studies estimate that the total cost of IAS in Europe (damages and management) amounted to EUR 116.61 billion between 1960 and 2020 ([70]). More recent studies have put this cost at USD 28 billion per year in the EU, increasing to USD 148.2 billion by 2040 ([71]), and at USD 423 billion annually at the global level ([72]).

The total number of IAS of Union concern in the country is 25. This includes 7 species recorded in the previous EIR (2021) and 18 additions. Of these additions, 13 were already on the Union concern list in 2021, and 5 were added later under Commission Implementing Regulation (EU) 2022/1203 ([73]).

([65]) In accordance with Article 17 of Directive 2008/56/EC.

([66]) Commission Implementing Regulation (EU) 2016/1141 of 13 July 2016 adopting a list of invasive alien species of Union concern pursuant to Regulation (EU) No 1143/2014 of the European Parliament and of the Council (OJ L 189, 14.7.2016, p. 4), as amended by Commission Implementing Regulations (EU) 2017/1263, (EU) 2019/1262 and (EU) 2022/1203, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02016R1141-20220802&from=EN.

([67]) Commission Implementing Regulation (EU) 2022/1203 of 12 July 2022 amending Implementing Regulation (EU) 2016/1141 to update the list of invasive alien species of Union concern (OJ L 186, 13.7.2022, p. 10), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R1203.

([68]) Governmental Gazette 4144/Β΄/23-6-2023.

([69]) Regulation (EU) No 1143/2014 of the European Parliament and of the Council of 22 October 2014 on the prevention and management of the introduction and spread of invasive alien species (OJ L 317, 4.11.2014, p. 35).

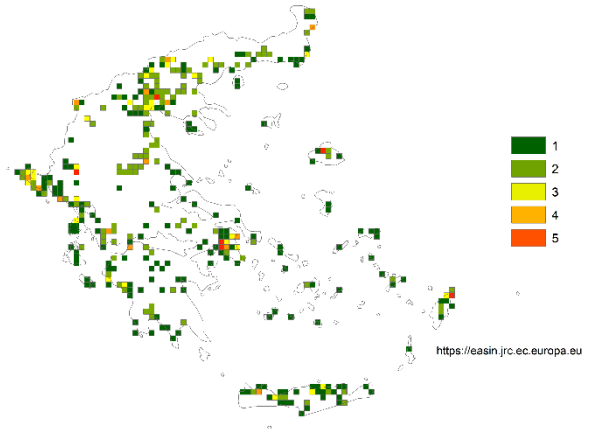
([70]) Haubrock, P. J., Turbelin, A. J., Cuthbert, R. N. et al., 'Economic costs of invasive alien species across Europe', *NeoBiota*, Vol. 63, 2021, pp. 153–190.

([71]) Henry, M., Leung, B., Cuthbert, R. N. et al., 'Unveiling the hidden economic toll of biological invasions in the European Union', *Environmental Sciences Europe*, Vol. 35, No 1, 2023, p. 43.

([72]) IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services), *Summary for Policymakers – Invasive alien species assessment*, 2023, https://www.ipbes.net/document-library-catalogue/summary-policymakers-invasive-alien-species-assessment.

([73]) Recently, the basis for an action plan on the management of the IAS that is most widely dangerous in many aspects, *Lagocephalus sceleratus*, was established in a comprehensive study.

Figure 14: Number of IAS of EU concern, based on available georeferenced information for Greece, 2024



Greece fulfilled the priority action for 2022 to step up the implementation of the IAS Regulation.

2025 priority action

- Step up implementation of the IAS Regulation, including with regard to enforcement and the capacity of inspection authorities.

Ecosystem assessment and accounting

The BDS calls on Member States to better integrate biodiversity considerations into public and business decision-making at all levels and to develop natural capital accounting.

Similarly, target 14 of the GBF ([74]) aims to ensure the full integration of biodiversity and its multiple values into policy and planning and, as appropriate, national accounting. This requires effective and coherent biodiversity observation and reporting on ecosystem condition in the EU ([75]).

The amended Regulation (EU) No 691/2011 on European environmental economic accounts ([76]) introduces new requirements for Member States to report on the condition of ecosystems including urban ecosystems, croplands, grasslands, forest and woodlands, coastal beaches, dunes and wetlands. Data reported by the Member States will feed into the second European ecosystem assessment, due in 2027, and can also be used to support policy decisions.

An ecosystem assessment is an analysis of the condition of ecosystems and the pressures acting on them, as well as the benefits that they provide to people, either directly or indirectly through the economy.

An increasing number of platforms, networks and communities of practice involve businesses in protecting biodiversity, including the EU Business & Biodiversity Platform ([77]). These platforms and communities are key tools for promoting and facilitating natural capital assessments among businesses and financial services providers.

Natural capital assessments help private businesses to better understand both the negative and positive impacts that they have on nature, and to appreciate how nature contributes to their success. Such understanding contributes to the implementation of the EU's BDS.

There is still no Greek business and biodiversity network member of the EU Business & Biodiversity Platform.

Ecosystem accounting in Greece is currently in its infancy. However, the policy relevance is clear. Up to now, no accounts have been finalised in Greece. However, a national ecosystem extent account, an ecosystem monetary asset account and a thematic biodiversity account, all for woodlands and forests, are being developed and are expected to be published soon. Regarding accounts for ecosystem services, a methodological framework is being designed for physical as well as for monetary accounting of water-related ecosystem services (i.e. water regulation).

The data needed for setting up natural capital accounting are scarce and unavailable in Greece. Methodologies have been developed to gather missing information and to start to develop accounts on ecosystems, ecosystem services and biodiversity.

([74]) Decision 15/4 adopted by the Conference of the Parties to the Convention on Biological Diversity: Kunming–Montreal global biodiversity framework (https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-04-en.pdf).

([75]) European Commission: Joint Research Centre and EEA, *EU Ecosystem Assessment – Summary for policymakers*, Publications Office of the European Union, Luxembourg, 2021, https://op.europa.eu/en/publication-detail/-/publication/81ff1498-b91d-11eb-8aca-01aa75ed71a1/language-en.

([76]) Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) No 691/2011 as regards introducing new environmental economic accounts modules, COM(2022) 329 final of 11 July 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2022:329:FIN.

([77]) The EU Business & Biodiversity Platform (https://green-business.ec.europa.eu/business-and-biodiversity_en) aims to promote the business case for biodiversity to businesses and financial institutions through workshops, seminars, reports and a cross-media communication strategy.

The main obstacles for implementing the ecosystem accounting framework of the system of environmental economic accounting in Greece are the lack of capacity and expertise of the stakeholders and state agencies involved, and data gaps. Knowledge sharing among the 'Mapping and assessment for integrated ecosystem accounting' project partners should address these shortcomings and provide guidance through each country's pilot accounts.

3. Zero pollution

Clean air

EU clean air policies and legislation have successfully reduced emissions of key air pollutants and significantly improved air quality, which is now moving towards the levels recommended by the World Health Organization (WHO). This has resulted in clear health benefits and reduced adverse impacts on ecosystems and biodiversity. However, to achieve the WHO-recommended levels, more efforts are needed, including full compliance with EU legislation. To guide these efforts, the EU zero pollution action plan sets targets for 2030 relative to 2005. These are to reduce the health impacts of air pollution by 55 % and to reduce the EU ecosystems threatened by air pollution by 25 %.

The EU has developed a comprehensive suite of air quality policies ([78]). These set health-based EU air quality standards ([79]) and stipulate Member States' national emission reduction commitments ([80]) for several air pollutants.

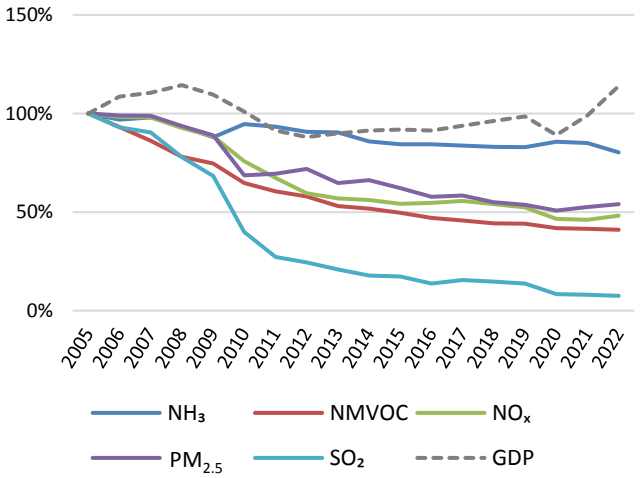
The air quality in Greece continues to give cause for concern in some parts of the territory.

The latest available annual estimates (for 2022) by the EEA ([81]) for Greece attribute 10 700 deaths each year (or 93 800 years of life lost (YLL)) to fine particulate matter ($PM_{2.5}$) ([82]), 2 200 deaths each year (or 19 500 YLL) to nitrogen dioxide (NO_2) ([83]) and 2 300 deaths each year (or 19 900 YLL) to ozone ([84]).

The emissions of several air pollutants have decreased significantly in Greece since 2005, while GDP growth has continued (see Figure 15). According to the inventories submitted under Article 10(2) of the National Emission Reduction Commitments Directive (NECD) ([85]) in 2024, Greece has met its emission reduction commitments for 2020–2029 for air pollutants nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOC), sulphur dioxide (SO_2), ammonia (NH_3) and $PM_{2.5}$. According to the latest projections submitted under Article 10(2) of the NECD, Greece is projected to meet its emission reduction commitments for 2030 onwards for NO_x, NMVOC, SO_2, NH_3 and $PM_{2.5}$.

Greece submitted its first national air pollution control programme (NAPCP) to the Commission on 26 January 2021.

Figure 15: Emission trends of main pollutants / GDP in Greece (%), 2005–2022



Source: EEA, 'National air pollutant emissions data viewer 2005–2022', 25 June 2024, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/national-air-pollutant-emissions-data-viewer-2005-2022.

([78]) European Commission, 'Air', European Commission website, https://environment.ec.europa.eu/topics/air_en.

([79]) European Commission, 'EU air quality standards', European Commission website, https://environment.ec.europa.eu/topics/air/air-quality/eu-air-quality-standards_en.

([80]) European Commission, 'Reducing emissions of air pollutants', European Commission website, https://environment.ec.europa.eu/topics/air/reducing-emissions-air-pollutants_en.

([81]) EEA, *Harm to human health from air pollution in Europe: Burden of disease 2024*, briefing No 21/2024, Copenhagen, 2024, https://www.eea.europa.eu/en/analysis/publications/harm-to-human-health-from-air-pollution-2024.

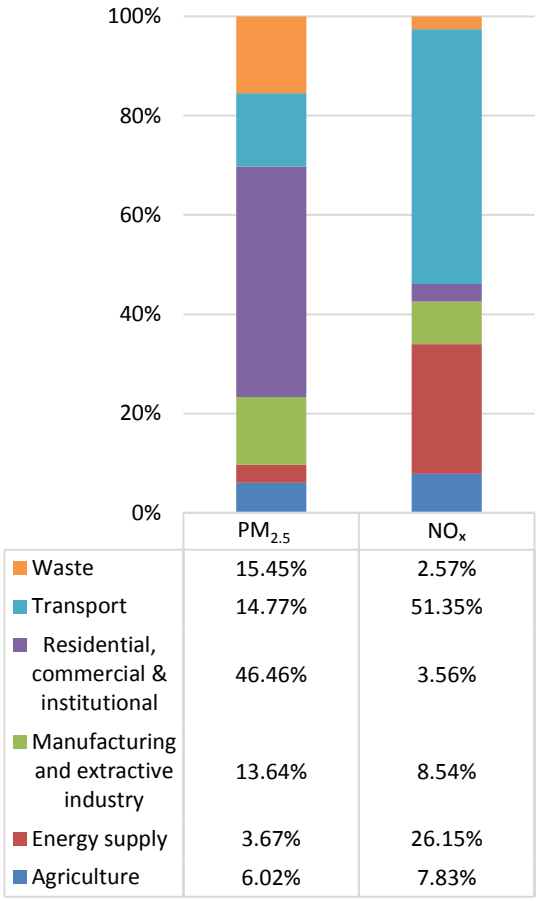
([82]) Particulate matter (PM) is a mixture of aerosol particles (solid and liquid) covering a wide range of sizes and chemical compositions. PM_{10} refers to particles with a diameter of 10 µm or less. $PM_{2.5}$ refers to particles with a diameter of 2.5 µm or less. PM is emitted from many human sources, including combustion.

([83]) Nitrogen dioxide (NO_2) here pertains to a group of gases called NO_x, which also comprises nitrogen monoxide (NO). NO_x is emitted during fuel combustion – for example, from industrial facilities and the road transport sector.

([84]) Low-level ozone is produced by photochemical action on pollution. This year, for the first time, the impact of long-term exposure to ozone has also been taken into account. In previous analysis by the EEA, only the impact of short-term exposure was estimated.

([85]) Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC (OJ L 344, 17.12.2016, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.344.01.0001.01.ENG.

Figure 16: $PM_{2.5}$ and NO_x emissions by sector in Greece (%), 2022



	$PM_{2.5}$	NO_x
Waste	15.45%	2.57%
Transport	14.77%	51.35%
Residential, commercial & institutional	46.46%	3.56%
Manufacturing and extractive industry	13.64%	8.54%
Energy supply	3.67%	26.15%
Agriculture	6.02%	7.83%

Source: EEA, 'National air pollutant emissions data viewer 2005–2022', 25 June 2024, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/national-air-pollutant-emissions-data-viewer-2005-2022.

In 2023, exceedances above the limit values set by the Ambient Air Quality Directive (AAQD) ([86]) were registered for NO_2 in two air quality zones ([87]), for PM_{10} in three air quality zones ([88]) and for $PM_{2.5}$ in one air quality zone ([89]) in Greece. Furthermore, the target values for ozone concentrations have not been met in several air quality zones, as well as the target value for benzo(a)pyrene (BaP) concentration in one air quality zone ([90]).

Persistent breaches of air quality requirements, which have severe negative effects on health and the environment, are being followed up by the European Commission through infringement procedures covering all Member States concerned, including Greece. The CJEU delivered two judgments in 2023 confirming the non-compliance of Greece with Directive 2008/50/EC, on exceedances of PM_{10} limit values in Thessaloniki (C-70/21) and on exceedances of NO_2 limit values in Athens (C-633/21). The aim is for appropriate measures to be put in place to bring all air quality zones into compliance with the directive.

Greece has not yet ratified the Heavy Metals Protocol and the Persistent Organic Pollutants Protocol to the Air Convention of the United Nations Economic Commission for Europe.

In the 2022 EIR, Greece received three priority actions. The first priority action was to further reduce emissions in the context of the NAPCP. Greece has made substantial progress on this, as the latest reported data show that the 2020–2029 emission reduction commitments have been met and that the emission reduction commitments for 2030 onwards are projected to be reached. The second priority action was to ensure full compliance with EU air quality standards and maintain downward emission trends. Based on the latest data, Greece has made some progress in this regard. However, exceedances above limit values and target values remain for NO_2, PM_{10}, $PM_{2.5}$, ozone and BaP, which require further action. Since 2019, downward emission trends have been reported for all main pollutants, except for $PM_{2.5}$, which requires further action. The third priority action received by Greece was to ratify the amended Gothenburg Protocol, the Heavy Metals Protocol and the Persistent Organic Pollutants Protocol. Substantial progress has been made, as the Gothenburg Protocol has been ratified, but the Heavy Metals Protocol and the Persistent Organic Pollutants Protocol remain unratified by Greece.

2025 priority actions

- As part of the NAPCP, take action to reduce emissions of air pollutants.
- Ensure full compliance with the current AAQD standards, also in light of future stricter requirements under the revised AAQD.
- Accelerate the ratification of relevant international conventions and protocols.

Industrial emissions

The main objectives of EU policy on industrial emissions are to:

(i) protect air, water and soil and to prevent harmful effects on human health and the environment;
(ii) prevent and manage waste;

([86]) Directive 2008/50/EU of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe (OJ L 152, 11.6.2008, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0050.
([87]) Agglomeration Athens and agglomeration Thessaloniki.
([88]) North Greece, agglomeration Athens and agglomeration Thessaloniki.
([89]) North Greece.
([90]) EEA, Eionet Central Data Repository ().

(iii) improve energy and resource efficiency, including water;
(iv) contribute to decarbonisation.

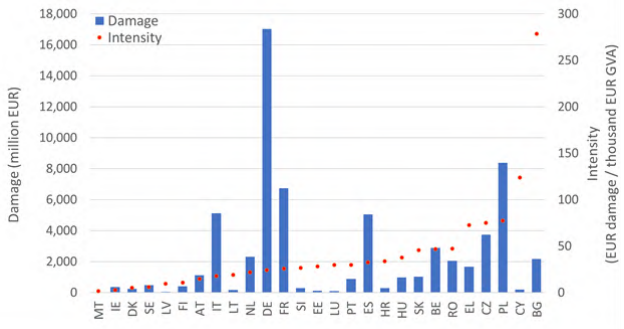
The cornerstone of the policy is the Industrial Emissions Directive (IED), which was revised in 2024 ([91]). The revision improves the directive's contribution to the zero pollution objective. It has a strong focus on innovation, and builds solid links between depollution, decarbonisation and circularity, making it a key regulatory tool to accompany the green transformation of EU industry by 2050.

The overview of industrial activities regulated by the IED below is based on data reported to the EU Registry in 2022 ([92]).

In Greece, around 390 industrial installations are required to have a permit based on the IED, with the majority of them being in the waste management sector, including landfills (29 %), followed by the intensive rearing of poultry and pigs (16 %), the energy sector (10 %) and the food and drink sector (10 %).

Figure 17 shows the damage to health and the environment due to the main industrial air pollutants. As this depends on, among other factors, the size of the industrial sector in each Member State, the figure also shows the ratio between the damage and the industrial activity (expressed in gross value added (GVA)), which gives an indication of the emissions 'intensity'. Greece has relatively high damage (the 11th highest damage in the EU) and it is above the EU average of EUR 27.5/EUR 1 000 GVA in emissions intensity (5th highest intensity in the EU). The main industrial contributor to emissions to air ([93]) is the energy sector (including refineries and gasification).

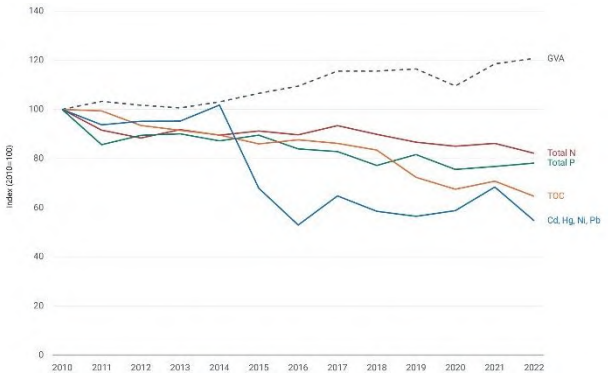
Figure 17: Industrial air pollution damage and intensity per Member State, 2021



Source: EEA, 'Industrial pollution intensity indicators – EU large industry air pollution damage costs intensity', European Industrial Emissions Portal, 2024, https://industry.eea.europa.eu/analyse/industrial-emissions-indicator.

Overall, the industrial emissions to water in the EU have decreased over time for all the main pollutants. On average in the EU, they appear to be decoupled from the industrial activity, which has increased over the same period (expressed in GVA), as shown in Figure 18.

Figure 18: Industrial releases of pollutants to water and industrial activity in the EU-27



NB: Cd, cadmium; Hg, mercury; Ni, nickel; Pb, lead; TOC, total organic carbon; total N, total nitrogen; total P, total phosphorous.

Source: EEA, 'Industrial pollutant releases to water in Europe', 30 May 2024, https://www.eea.europa.eu/en/analysis/indicators/industrial-pollutant-releases-to-water.

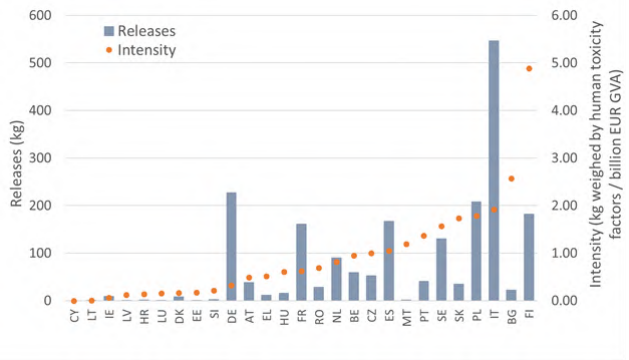
Concerning Greece in particular, Figure 20 shows the industrial emissions of heavy metals to water, taking into account the human toxicity of each metal, as well as the emissions intensity, based on its ratio with industrial activity (expressed in GVA). Greece has the 11th lowest emissions of heavy metals to water and is in 16th position for emissions intensity (with the EU average intensity being 0.864 kg/EUR 1 billion GVA). As shown in Figure 20, the main industrial contributors to emissions to water in Greece are the energy sector (including refineries) in general and livestock rearing for emissions of nitrogen and phosphorus.

([91]) Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial and livestock rearing emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17), as amended by Directive (EU) 2024/1785 of the European Parliament and of the Council of 24 April 2024, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010L0075-20240804&qid=1725983863299.

([92]) EEA, European Industrial Emissions Portal, https://industry.eea.europa.eu/, 2022 being the baseline year for all reports.

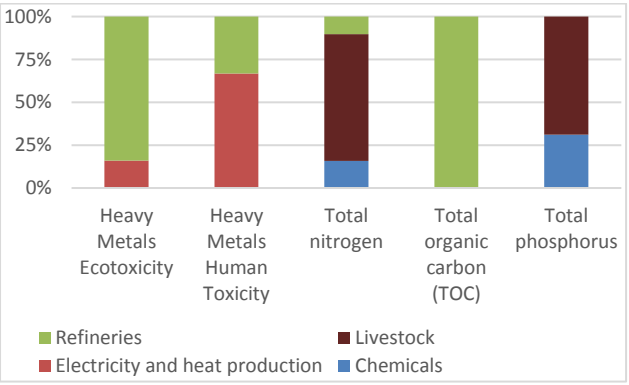
([93]) European Environment Agency, LRTAP, Air pollutant emissions data viewer (Gothenburg Protocol, LRTAP Convention) 1990-2022, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/air-pollutant-emissions-data-viewer-1990-2022.

Figure 19: Industrial releases and intensity of heavy metals to water per Member State, 2022



Source: EEA, 'Industrial pollution intensity indicators – EU large industry water pollution intensity', European Industrial Emissions Portal, 2024, https://industry.eea.europa.eu/analyse/industrial-emissions-indicator.

Figure 20: Relative releases to water from industry in Greece (%), 2022



Source: EEA, 'Industrial reporting under the Industrial Emissions Directive 2010/75/EU and European Pollutant Release and Transfer Register Regulation (EC) No 166/2006 – ver. 12.0 Sep. 2024 (tabular data)', EEA Geospatial Data Catalogue, 13 September 2024, https://doi.org/10.2909/cf5e54c1-be99-4426-bcad-baa26c4f27a0.

IED provisions on public information and participation require Member States to adopt transposition legislation enabling members of the public to have access to relevant information and participate in the approval process for potentially polluting installations. Thus, the public and non-governmental organisations (NGOs), alongside competent authorities, play a role in ensuring compliance of these permits with EU legislation. The IED contains mandatory requirements on environmental inspections, requiring a site visit to take place at least every 1–3 years, using risk-based criteria In addition, IED enforcement provisions require Member States to determine effective, proportionate, and dissuasive penalties applicable to infringements of IED-based national provisions. In the revised directive, the provisions set that worst infringements can be sanctioned by fines of at least 3% of the annual EU turnover of the legal person. The revised IED also introduces a right to compensation for people whose health has been harmed by such infringements.

The development of best available techniques (BATs), BAT reference documents and BAT conclusions ensures effective collaboration between stakeholders and enables better implementation of the IED.

Since the 2022 EIR, the Commission has adopted BAT conclusions on (i) ferrous metal processing, (ii) the textiles industry, (iii) common waste gas management and treatment systems in the chemical sector and (iv) smitheries and foundries.

The Commission relies on the efforts of national competent authorities to implement the legally binding BAT conclusions and associated BAT emission levels in environmental permits. This should result in considerable and continuous reductions in pollution.

In the 2019 and 2022 EIRs, Greece received priority actions to review permits and to strengthen control and enforcement in line with the BAT conclusions and to address pollution in power sector installations. There is no data available to assess progress towards these priority actions.

2025 priority actions

- Reduce industrial air pollution damage and intensity.
- Reduce industrial releases to water and their intensity.
- Engage with industry and environmental NGOs to ensure proper contribution to and implementation of BAT conclusions and ensure timely updates to permits following the publication of BAT conclusions.
- Ensure effective public participation and access to justice in relation to the IED.

Major industrial accidents prevention – Seveso

The main objectives of EU policy on the prevention of major industrial accidents are to:

(i) control major-accident hazards involving dangerous substances, especially chemicals;
(ii) limit the consequences of such accidents for human health and the environment;
(iii) continuously improve the prevention of, preparedness for and response to major accidents.

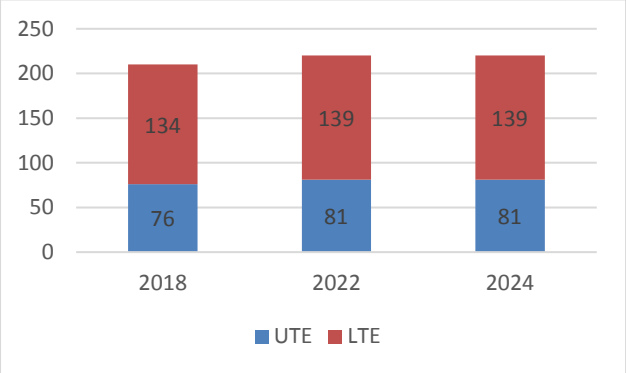
The cornerstone of the policy is Directive 2012/18/EU (the Seveso III Directive ([94]).

([94]) Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC (OJ L 197, 24.7.2012, p. 1), https://eur-lex.europa.eu/eli/dir/2012/18/oj.

The overview below of industrial plants regulated by the Seveso III Directive ('Seveso establishments') is based on data reported on eSPIRS (e-Seveso Plants Information Retrieval System) for 2022–2024 ([95]) and the report by Greece on the implementation of the Seveso III Directive for 2019–2022 ([96]).

In 2024, of the 220 Seveso establishments in Greece, 139 were categorised as lower-tier establishments and 81 as upper-tier establishments (UTEs), based on the quantity of hazardous substances likely to be present. UTEs are subject to more stringent requirements. The number of Seveso establishments for various years is presented in Figure 21.

Figure 21: Number of Seveso establishments in Greece, 2018, 2022 and 2024



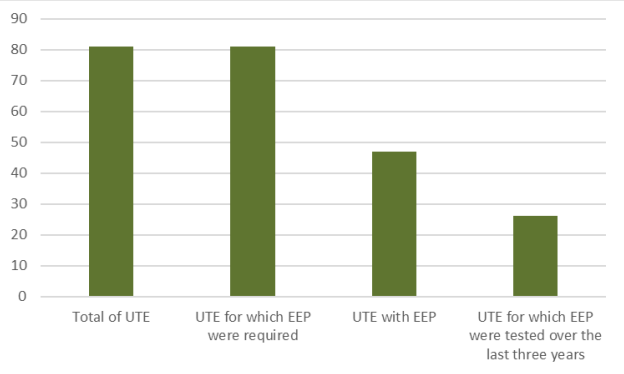
NB: LTE, lower-tier establishment.

Sources: European Commission: Directorate-General for Environment, Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances), Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en.

Member States are required to draw up external emergency plans (EEPs). These EEPs are essential to allow proper preparation and effective implementation of the necessary actions to protect the environment and the population should a major industrial accident occur.

According to the Greek authorities, in 2022 an EEP was required for all 81 UTEs. In addition, 47 of them had an EEP and 26 EEPs had been tested over the last three years. The summary is shown in Figure 22.

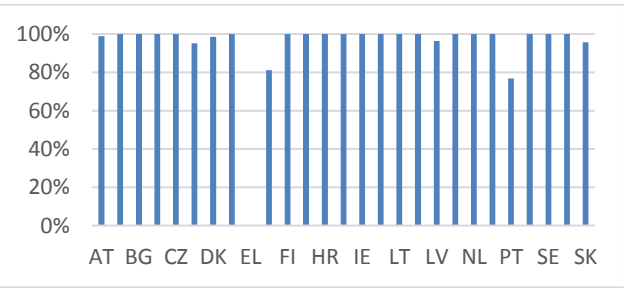
Figure 22: Situation regarding EEPs in Greece, 2022



Sources: European Commission: Directorate-General for Environment, Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances), Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en.

Greece did not report on the number of Seveso establishments for which information for the public referred to in Annex V to the Seveso III Directive is permanently available, but indicated that this information can be provided at the prefectoral level. This is important, as awareness by the public of this information may ameliorate the consequences of a major industrial accident.

Figure 23: Share of UTEs for which information on safety measures and requisite behaviours was actively made available to the public per Member State (%), 2022



NB: No data available for Greece.

Sources: European Commission: Directorate-General for Environment, Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances), Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-

([95]) ; data extracted in September 2024.

([96]) As provided for by Article 21(2) of the Seveso III Directive.

en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en.

The shares of UTEs for which information on safety measures and requisite behaviours was actively made available to the public in 2022 in the EU-27 are presented in Figure 23. No data were available for Greece as it has not reported information on that issue. This provision on knowledge is an important provision of the Seveso III Directive, as awareness by the public of this information may ameliorate the consequences of a major industrial accident.

In 2022, Greece was given a priority action to strengthen control and enforcement to ensure compliance with Seveso III Directive provisions, especially on information to the public and on EEPs.

Data reported on the implementation of the directive for 2019–2022 do not show substantial progress in the numbers of EEPs established and tested for UTEs in Greece.

2025 priority actions

- Strengthen compliance with requirements on safety measures to prevent major accidents and ensure appropriate preparedness and response in relation to UTEs, in particular as regards reviewing, testing and updating EEPs, at intervals of no longer than three years.
- Ensure access to transparent and clear information towards citizens on risks and behaviour in the event of accidents.
- Ensure full and correct transposition of the Seveso III Directive.
- Improve reporting on implementation of the Seveso III Directive.

Mercury Regulation

The Mercury Regulation establishes measures and conditions concerning the use and storage of and trade in mercury, mercury compounds and mixtures of mercury, the manufacture and use of and trade in mercury-added products and the management of mercury waste, in order to ensure a high level of protection of human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds. The revision of the Mercury Regulation adopted in 2024 sets out rules to address the last intentional uses of mercury in the EU by phasing out the use of dental amalgam by 1 January 2025 except when deemed strictly necessary by the dental practitioner based on the specific medical needs of the patient, and prohibiting the manufacture and export of additional mercury-containing lamps from 1 January 2026 or 1 January 2027 (depending on the lamp category).

In 2019, 43 % of dental treatments were still using dental amalgam, which represented a challenge for Greece to phase out its use by 1 January 2025. However, measures should have been put in place to ensure a socially and economically sound phase-out, including an adequate reimbursement of the alternatives to dental amalgam through the health insurance scheme and the training of dental practitioners. The Commission is monitoring whether the phase-out has taken place under the terms and conditions of the regulation. Greece will also need to ensure that the manufacture and export of mercury-containing lamps are prohibited by the deadlines set out in the Mercury Regulation.

Noise

The Environmental Noise Directive ([97]) requires a common approach to avoid, prevent and reduce the harmful effects of noise. The designated authorities are responsible for making and approving noise maps and action plans for agglomerations, major roads, major railways and major airports. Member States decide on noise limits that are not set at the EU level. Nevertheless, the zero pollution action plan sets as a 2030 target a 30 % reduction compared with 2017 in the share of people chronically disturbed by transport noise.

Excessive noise from aircraft, railways and roads is one of the main causes of environmental health-related issues in the EU. It can cause ischaemic heart disease, stroke, interrupted sleep, cognitive impairment and stress ([98]).

In Greece, environmental noise is estimated to cause at least around 170 cases of ischaemic heart disease

([97]) Directive 2002/49/EC of the European Parliament and of the Council of 25 June 2002 relating to the assessment and management of environmental noise – Declaration by the Commission in the Conciliation Committee on the directive relating to the assessment and management of environmental noise (OJ L 189, 18.7.2002, p. 12), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32002L0049.

([98]) WHO, *Environmental Noise Guidelines for the European Region*, Copenhagen, 2018, https://www.who.int/europe/publications/i/item/9789289053563.

annually ([99]) and some 42 500 people to suffer from disturbed sleep([100]).

Based on the latest set of information analysed, Greece has not completed its noise mapping of agglomerations, roads, railways and airports.

Action plans for noise management for agglomerations, roads, railways and airports must be updated and submitted to the Commission every five years. The deadline for reporting noise action plans under the most recent reporting cycle was 18 January 2025; these plans have not been assessed yet.

Since Greece failed to report to the Commission all relevant information on the strategic noise maps, including the noise exposure of the population, the European Commission decided to open an infringement procedure against Greece, in addition to an ongoing infringement procedure related to the failure to adopt noise action plans.

Greece received two priority actions in the 2022 EIR regarding the need to complete noise mapping and noise action plans. There has been no progress on the first priority action on noise mapping, as detailed above. Given that reporting under the most recent reporting cycle for noise action plans was due in early 2025, these have not been assessed. Therefore, this priority action is maintained for the 2025 EIR.

Therefore, both priority actions are repeated for the 2025 EIR.

2025 priority actions

- Complete noise mapping.
- Complete and implement action plans on noise management.

Water quality and management

EU legislation and policy requires that the impact of pressures on transitional waters, coastal waters and fresh water (including surface waters and groundwater) be significantly reduced. Achieving, maintaining or enhancing a good status of waterbodies as defined by the Water Framework Directive will ensure that EU citizens and the environment benefit from good-quality and safe drinking and bathing water. It will further ensure that the nutrient cycle (nitrogen and phosphorus) is managed in a more sustainable and resource-efficient way.

Water Framework Directive

The Water Framework Directive ([101]) is the cornerstone of EU water policy in the 21st century ([102]). The Water Framework Directive and other water-related directives ([103]) form the basis of sustainable and integrated water management in the EU. They aim to achieve a high level of protection of water resources, prevention of further deterioration and restoration to good status. These objectives are very important for the EU's competitiveness, strategic autonomy and security, yet have become even more challenging in the face of climate change affecting our precious water resources.

The Water Framework Directive establishes a procedural framework for reaching good surface water ecological and chemical status and good groundwater quantitative and chemical status. This implies monitoring and classification of all waterbodies, assessment of pressures and impacts and identification of the most cost-effective measures to achieve the objectives of the directive. The directive dates from 2000 and set an initial deadline of 2015 for achieving its objectives, with the option to extend the deadline to the end of 2027. Every six years, Member States must report their river basin management plans (RBMPs) to the Commission. They should cover river basin districts in their

([99]) These figures are an estimation by the EEA based on (i) the data reported by Member States on noise exposure covered by Directive 2002/49/EC for the round of noise mapping of 2022; (ii) European Topic Centre on Air Pollution, Transport, Noise and Industrial Pollution (ETC/ATNI), *Noise Indicators under the Environmental Noise Directive 2021: Methodology for estimating missing data*, Eionet report ETC/ATNI No 2021/06, Kjeller, 2021; and (iii) the methodology for health impact calculations in European Topic Centre on Air Pollution and Climate Change Mitigation (ETC/ACM), *Implications of environmental noise on health and wellbeing in Europe*, Eionet report ETC/ACM No 2018/10, Bilthoven, 2018, https://www.eionet.europa.eu/etcs/etc-atni/products/etc-atni-reports/eionet_rep_etcacm_2018_10_healthimplicationsnoise.

([100]) More information on the adverse health effects of noise pollution is available at: https://www.eea.europa.eu/themes/human/noise/noise-2.

([101]) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060.

([102]) https://environment.ec.europa.eu/topics/water_en.

([103]) These include the Groundwater Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006L0118), the Environmental Quality Standards Directive (https://eur-lex.europa.eu/eli/dir/2008/105/oj), the Floods Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32007L0060), the Bathing Water Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006L0007), the Urban Wastewater Treatment Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31991L0271), the new Drinking Water Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020L2184), the Nitrates Directive (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A31991L0676), the MSFD (https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32008L0056) and the IED (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010L0075).

countries, some of which may be shared with other countries. The Commission has assessed the third cycle of RBMPs, which were to be submitted by March 2022, and reported its findings to the European Parliament and to the Council on 4th February 2025 ([104]).

Greece is facing water scarcity, as evidenced by the Seasonal Water Exploitation Index +[105]. In 2022, this index reaches 33.6 % which is much above the 20% generally considered as a sign of scarcity in the third quarter of the year. Above 40%, it would be a sign of severe scarcity. This seasonal index at national level does not reflect the situation at river basin level[106] where more acute water stress can be recorded.

Floods Directive

Every six years, following the same reporting cycle as the RBMPs, all Member States also report their flood risk management plans (FRMPs), based on the flood hazard and risk maps (FHRMs) and the preliminary flood risk assessments drawn up during the second cycle (2016–2021).

The Commission assessed the FRMPs and reported its findings to the European Parliament and to the Council on 4th February 2025, together with the assessment of the RBMPs.

Greece did not submit the third RBMPs and second FRMPs by March 2022, as required under the Water Framework Directive and the Floods Directive. The Commission opened an infringement procedure for late reporting. Greece was referred to the CJEU in March 2024. Greece finally reported all its third RBMPs by June 2024. However, the second FRMPs are being compiled and are expected to be reported shortly ([107]). As a result of this late and, in the case of the FRMPs, still lacking reporting as of mid December 2024, the Commission has not been in a position to assess the plans and include such assessment in its report to the European Parliament and to the Council ([108]).

As a consequence, the EIR report cannot be updated for Greece and reference is made to the 2022 EIR for an overview of the main issues ([109]).

Drinking Water Directive

The recast Drinking Water Directive is now applicable, and Member States were required to transpose its provisions into their national legal systems by 12 January 2023. Since the entry into force of the recast directive, the Commission has adopted several delegated and implementing acts establishing (i) a watch list of substances and compounds of concern for drinking water ([110]), (ii) a methodology for measuring microplastics in drinking water ([111]) and (iii) an EU system for testing and approving materials that will be allowed to be in contact with drinking water ([112]). Member States will have to take these various Commission acts into account when implementing the recast directive.

Finally, the Commission has now received data from Member States on the quality of drinking water in 2017–2019.

The quality of drinking water (supplied by large water suppliers) in Greece does not give rise to concern ([113]). From January 2026, the European quality standards for per- and polyfluoroalkyl substances in drinking water will apply, ensuring harmonised Member States' reporting of per- and polyfluoroalkyl substance monitoring data in the future.

Bathing Water Directive

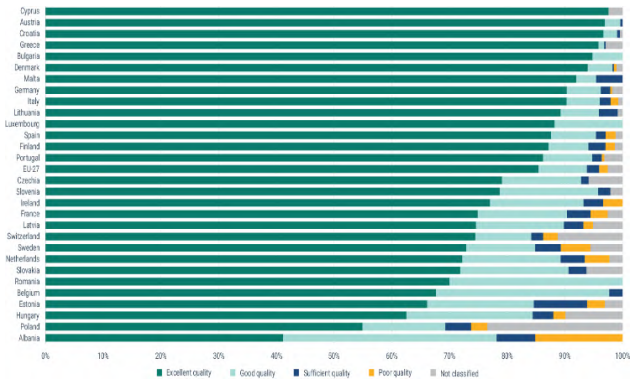
The Bathing Water Directive requires Member States to monitor and assess bathing water. It requires that, during the bathing season, Member States disseminate to the public information on bathing water quality actively and

([104]) ENV - Bibliothèque
([105]) https://www.eea.europa.eu/en/analysis/indicators/use-of-freshwater-resources-in-europe-1.
([106]) https://www.eea.europa.eu/en/analysis/maps-and-charts/percentage-of-seasons-with-water-stress.
([107]) The second flood hazard and risk maps have been completed since November 2023 and significant progress has been made in the compilation of FRMPs. Their submission is imminent (https://floods.ypeka.gr/consultation/2round-consultation/).
([108]) [A link to this report will be added once it is published.]
([109]) https://environment.ec.europa.eu/law-and-governance/environmental-implementation-review_en#country-reports.
([110]) https://environment.ec.europa.eu/publications/implementing-decision-drinking-water-directive-watch-list_en.
([111]) Commission Delegated Decision (EU) 2024/1441 of 11 March 2024 supplementing Directive (EU) 2020/2184 of the European Parliament and of the Council by laying down a methodology to measure microplastics in water intended for human consumption (notified under document C(2024) 1459) (OJ L, 2024/1441, 21.5.2024), http://data.europa.eu/eli/dec_del/2024/1441/oj.
([112]) OJ L, 2024/365, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/365/oj; OJ L, 2024/367, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/367/oj; OJ L, 2024/369, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/369/oj; OJ L, 2024/368, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/368/oj; OJ L, 2024/370, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/370/oj; OJ L, 2024/371, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/371/oj; see the Commission web page on all six delegated acts for more information (https://environment.ec.europa.eu/publications/delegated-acts-drinking-water-directive_en).
([113]) In summary, the compliance for all parameter groups in Greece was at least 98.50 % in 2017, 98.24 % in 2018 and 98.34 % in 2019.

promptly. In particular, notices banning or advising against bathing should be rapidly and easily identifiable.

Figure 24 shows that in 2023, out of the 1 731 Greek bathing waters, 1 659 (95.8 %) were of excellent quality, 17 (1 %) bathing waters were of good quality and 4 (0.2 %) bathing waters were of sufficient quality. No bathing waters were found to be of poor quality. However, 51 (2.9 %) bathing waters were not classified. Detailed information on Greek bathing waters is available from the national portal ([114]) and through an interactive map viewer of the EEA ([115]).

Figure 24: Bathing water quality per Member State, Albania and Switzerland (%), 2023.



Source: EEA, *European Bathing Water Quality in 2023*, briefing No 04/2024, Copenhagen, 2024, https://www.eea.europa.eu/publications/european-bathing-water-quality-in-2023/.

Nitrates Directive

The Nitrates Directive ([116]) aims to protect water quality across Europe by preventing nitrates from agricultural sources that can pollute groundwater and surface waters and by promoting the use of good farming practices.

The latest Commission report on the implementation of the Nitrates Directive ([117]), dating back to 2021, warns that nitrates are still causing harmful pollution to water in the EU. Excessive nitrates in water are harmful to both human health and ecosystems, causing oxygen depletion and eutrophication. Cleaning of waters by national authorities or farmers, where it has been undertaken, has had a positive impact on the drinking water supply and on biodiversity. It has also benefited the sectors – such as fisheries and tourism – that depend on biodiversity and on a good supply of drinking water. Nevertheless, excessive fertilisation remains a problem in many parts of the EU.

The analysis of Greece's RBMPs has identified nutrients from agriculture as an important pressure on groundwater / surface waters that is affecting these waters' good status and as one of the main factors in not meeting the WFD objectives.

Since 2021, the updated Code of Good Agricultural Practice for the Protection of Waters from Nitrate Pollution of Agricultural Origin has been in force. Its purpose is to provide proper guidance on the implementation of good agricultural practices to all those involved in agricultural and livestock activities to protect the environment, with the aim being to prevent groundwater and surface waters being polluted by nitrate ions.

In 2022, Greece received a priority action on tackling nutrient pollution, especially nitrates from agriculture, through the implementation of the Nitrates Directive. Since the report on the implementation of the Nitrates Directive covering 2020–2023 will become available in 2025, the 2022 EIR priority action cannot be assessed and is repeated.

2025 priority action

- Tackle nutrients pollution, especially nitrates from agriculture, through the implementation of the Nitrates Directive.

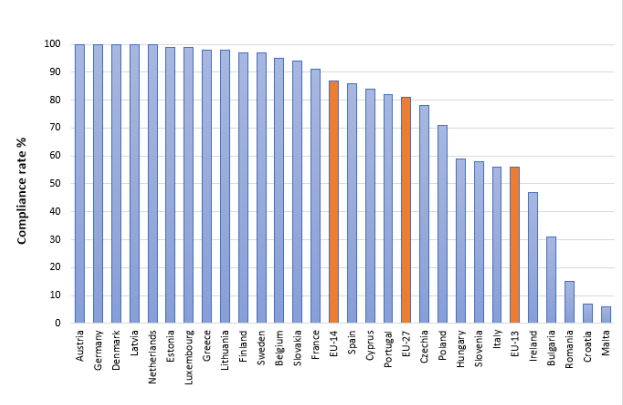
Urban Wastewater Treatment Directive

The Urban Wastewater Treatment Directive (UWWTD) aims to protect human health and the environment from the effects of untreated urban waste water. It therefore requires Member States to collect and treat (secondary or biological treatment) waste water in all urban areas of more than 2 000 people, and to apply a more stringent treatment than secondary, with nitrogen and/or phosphorus removal, to the waste water generated in urban areas, also known as agglomerations, of more than 10 000 people, before they are discharged into waters and their catchments, when they are sensitive to nitrogen and/or phosphorus (i.e. eutrophic or tending to become eutrophic).

Overall, in Greece, the compliance rate was 98 % in 2020. However, 31 agglomerations, generating 235 480 population equivalent of urban waste water, did not comply with the requirements of the directive.

([114]) http://www.bathingwaterprofiles.gr/en.
([115]) EEA, 'State of bathing water', EEA website, 2024, https://www.eea.europa.eu/en/topics/in-depth/bathing-water/state-of-bathing-water.
([116]) https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1561542776070&uri=CELEX:01991L0676-20081211.
([117]) https://environment.ec.europa.eu/topics/water/nitrates_en.

Figure 25: Proportion of urban waste water that fully complies with the UWWTD (%), 2020



Source: 12th technical assessment of UWWTD implementation - Publications Office of the EU

Three infringement proceedings, each at a very advanced stage, are open against Greece for non-compliance with the requirements of the directive. For two of these infringement procedures (agglomerations in eastern Attica and Thriasio Pedio), judgments of the CJEU have been delivered and Greece will continue to pay fines (to date, EUR 69 million for the first case and EUR 17 million for the second one) until it complies with these CJEU judgments ([118]). Additionally, Greece was referred to the CJEU in July 2024 as part of the third ongoing infringement procedure, concerning 153 agglomerations ([119]). In all these cases, Greece must ensure that the urban waste water of the concerned agglomerations is collected and treated appropriately. It is essential that Greece takes the necessary measures to fully comply with the requirements of the directive. The continuous non-compliance with the rulings of the CJEU is an indication of systemic weaknesses in the Member State's administrative system.

This is all the more important as the directive has been revised in order to, among other things, strengthen existing treatment standards and establish an additional treatment of micropollutants in urban waste water. Other new requirements relate to moving towards the energy neutrality of the sector, establishing an EPR system to ensure sustainable financing of micropollutant treatment by the most polluting industries and ensuring access to sanitation, especially for vulnerable and marginalised groups. Greece has until 31 July 2027 to transpose the new directive into its national legal system.

The 2019 and 2022 EIRs for Greece included three priority actions on water management. Considering that progress has been limited, the following action is recommended.

2025 priority action

- Take the necessary measures to ensure full implementation of the current urban wastewater treatment directive, taking into account the new requirements of the recast directive.

Chemicals

The EU seeks to ensure that chemicals are produced and used in a way that minimises any significant adverse effects on human health and the environment. In October 2020, the Commission published its chemicals strategy for sustainability towards a toxic-free environment ([120]), which led to some systemic changes in EU chemicals legislation. The strategy is part of the EU's zero pollution ambition – a key commitment of the European Green Deal.

The EU's chemicals legislation ([121]) provides a baseline protection for human health and the environment. It also ensures stability and predictability for businesses operating in the internal market.

Since 2007, the Commission has gathered information on the enforcement of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation and the Classification, Labelling and Packaging (CLP) Regulation. In December 2020, the Commission

([118]) Judgment of 22 February 2018, *Commission* v *Greece*, C-328/16, EU:C:2018:98; Judgment of 15 October 2015, *Commission* v *Greece*, C-167/14, EU:C:2015:684.

([119]) INFR(2020)2021.

([120]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Chemicals strategy for sustainability: Towards a toxic-free environment, COM(2020) 667 final of 14 October 2020, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A667%3AFIN; Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1), https://publications.europa.eu/resource/cellar/c6b6a31d-8359-11ee-99ba-01aa75ed71a1.0004.02/DOC_2.

([121]) Namely, Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the registration, evaluation, authorisation and restriction of chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (OJ L 396, 30/12/2006, p. 1), https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32006R1907; and Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1272-20221217.

assessed the Member States' reports ([122]) on the implementation and enforcement of these regulations ([123]). It is apparent from the Commission's report that there are still many disparities in the implementation of the REACH and CLP Regulations, notably in the area of law enforcement. Recorded compliance levels in Member States, generally quite stable over time, appear to be getting slightly worse. This may be because (i) enforcement authorities are becoming more effective in detecting non-compliant products/companies and (ii) more non-compliant products are being placed on the EU market.

In August 2021, the Commission published a measurable assessment of the enforcement ([124]) of the two main EU regulations on chemicals using a set of indicators on different aspects of enforcement. Since 2021, the list of chemicals subject to restrictions has been expanded as new entries have been added to Annex XVII to the REACH Regulation ([125]).

In 2023, new hazard classes were added to the CLP Regulation, and the revision of the regulation was tabled (published on 20 November 2024) ([126]). The new hazard classes cover endocrine disruptors and persistence-related hazards while the revision of the regulation encompasses new rules on online sales to better tackle non-compliances observed over the years. Also in 2023, the Conference of the Parties of the Stockholm Convention (COP) decided to include, in its Annex A (which lists banned substances), three new chemicals ([127]). The Commission is working on the delegated acts to include these substances in Annex I to the Persistent Organic Pollutants Regulation by 2025 at the latest.

Responsibility for checking compliance with the REACH Regulation in Greece lies with the following authorities ([128]):

- Independent Authority for Public Revenue (Directorate-General),
- General Chemical State Laboratory (Directorate of Energy, Industrial and Chemical Products),
- all the regional chemical services.

Greece has fully implemented enforcement strategies for both the REACH and CLP Regulation ([129]).

The Member States' reporting exercise set out in Article 117 of the REACH Regulation and Article 46 of the CLP Regulation is conducted every five years. The results of the coming one are expected in 2025, hence the absence of new country-specific data on enforcement since 2022.

In 2022, 70 staff members were allocated to REACH and CLP Regulation enforcement in Greece ([130]). Almost 2 000 REACH checks were carried out in the previous reporting period (2019).

In 2020, Greece participated in an EU coordinated enforcement project on products sold online, called the REACH-EN-FORCE (REF)-8 project ([131]). The report was adopted in November 2021, so it could not be taken into account in the previous EIR.

([122]) European Commission, *Technical assistance to review the existing Member States reporting questionnaire under Articles 117(1) of REACH and 46(2) of CLP – Final report*, Publications Office of the European Union, Luxembourg, 2020, https://circabc.europa.eu/ui/group/8ee3c69a-bccb-4f22-89ca-277e35de7c63/library/a4abce8c-8425-455f-b7e6-0ead917bde6b/details.

([123]) In line with Article 117(1) of the REACH Regulation and Article 46(2) of the CLP Regulation.

([124]) European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, *REACH and CLP Enforcement: EU-level enforcement indicators*, Publications Office of the European Union, Luxembourg, 2021, https://op.europa.eu/en/publication-detail/-/publication/e5c3e461-0f85-11ec-9151-01aa75ed71a1/.

([125]) These are substances in tattoo inks and permanent make-up, *N,N*-dimethylformamide, formaldehyde (and formaldehyde releasers), lead in PVC, siloxanes (D4, D5, D6) and, finally, microplastics.

([126]) Regulation (EU) 2024/2865 of the European Parliament and of the Council of 23 October 2024 amending Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures, OJ L, 2024/2865, 20.11.2024, p.1 (Regulation - EU - 2024/2865 - EN - EUR-Lex)

([127]) These are methoxychlor, dechlorane plus and UV-328. In the case of the pesticide methoxychlor, there are no exemptions from the ban. However, for the two plastic additives, dechlorane plus and UV-328, the COP decision lists some time-limited specific exemptions.

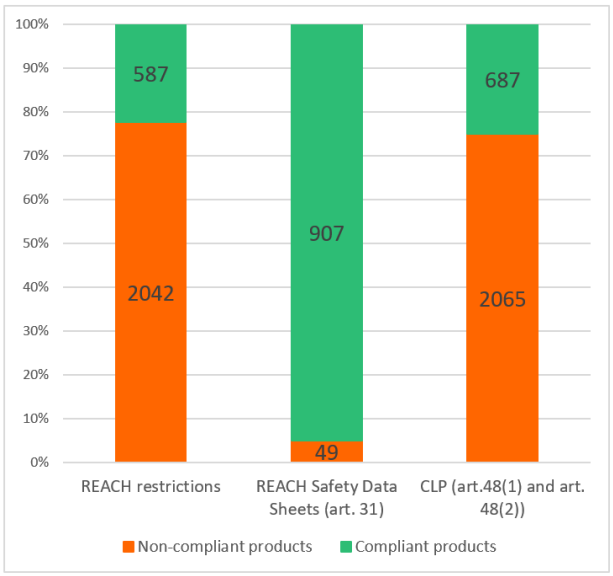
([128]) European Commission, *Technical assistance to review the existing Member States reporting questionnaire under Articles 117(1) of REACH and 46(2) of CLP – Final report*, Publications Office of the European Union, Luxembourg, 2020, p. 68, https://circabc.europa.eu/ui/group/8ee3c69a-bccb-4f22-89ca-277e35de7c63/library/a4abce8c-8425-455f-b7e6-0ead917bde6b/details.

([129]) European Commission, *Technical assistance to review the existing Member States reporting questionnaire under Articles 117(1) of REACH and 46(2) of CLP – Final report*, Publications Office of the European Union, Luxembourg, 2020, p. 76, https://circabc.europa.eu/ui/group/8ee3c69a-bccb-4f22-89ca-277e35de7c63/library/a4abce8c-8425-455f-b7e6-0ead917bde6b/details.

([130]) European Commission, *Technical assistance to review the existing Member States reporting questionnaire under Articles 117(1) of REACH and 46(2) of CLP – Final report*, Publications Office of the European Union, Luxembourg, 2020, p. 74, https://circabc.europa.eu/ui/group/8ee3c69a-bccb-4f22-89ca-277e35de7c63/library/a4abce8c-8425-455f-b7e6-0ead917bde6b/details.

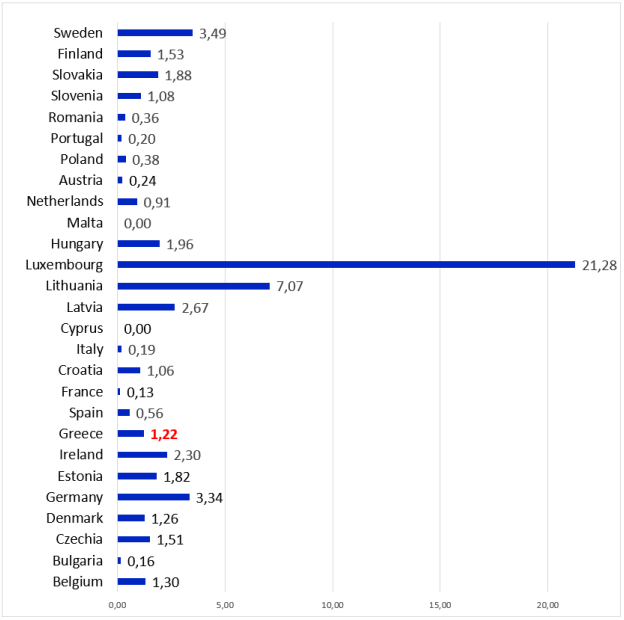
([131]) European Chemicals Agency, *REF-8 project report on enforcement of the CLP, REACH and BPR duties related to substances, mixtures and articles sold online*, Helsinki, 2021, p. 20, https://echa.europa.eu/documents/10162/17088/project_report_ref-8_en.pdf/ccf2c453-da0e-c185-908e-3a0343b25802?t=1638885422475.

Figure 26: Compliance of imported products – results of the REF-8 project (%)



A risk approach was used for the targeting of control measures in order to maximise the chances of identifying non-compliances. Therefore, the non-compliance rates presented above cannot be considered the average non-compliance rates of products in the EU. However, the proportion of non-compliance cases found in the REF-8 project are of concern.

Figure 27: Number of REF-8 checks performed per 100 000 inhabitants (EU average = 1.24)



Greece's participation in the REF-8 coordinated enforcement project was around the EU average.

In 2022, Greece received a priority action related to upgrading administrative capacities in implementation and enforcement to move towards a policy of zero tolerance of non-compliance. In the absence of reporting since 2022, no progress has been shown and this priority action remains valid in 2025, partly because of the experience with the REF-8 project.

2025 priority actions

- Upgrade the administrative capacities in implementation and enforcement towards a policy of zero tolerance for non-compliance.
- Increase involvement in the activities of the Forum for Exchange of Information on Enforcement of the European Chemicals Agency, including in the coordinated enforcement projects, called REFs.
- Increase customs controls and controls of products sold online with regard to compliance with chemicals legislations.

4. Climate action

The impacts of climate change have continued to increase in recent years, inflicting damage and suffering in the EU and around the world. Globally, 2023 was the hottest year on record, while Europe has been warming twice as quickly as the global average, and is now the fastest-warming continent. The frequency and severity of extreme climate events are also increasing. Against this backdrop, the EU has demonstrated its determination to implement the European Green Deal and to become climate neutral and resilient by 2050, ensuring sustainable competitiveness and supporting EU industry in the net-zero transition. The European Climate Law is the EU's response to the need for action. It sets the objective of achieving climate neutrality by 2050 and a midterm target of a reduction in GHG emissions of at least 55 % by 2030, and outlines the adaptation efforts necessary to adjust to climate change's present and future impacts. Almost all the 'Fit for 55' proposals set out in the European Green Deal have been agreed in law, and the European Commission recommended a new intermediate climate target of a 90 % reduction in emissions by 2040. In 2024, the Member States submitted updated national energy and climate plans for 2021–2030, reflecting the increased ambition of the revised EU legislation. In 2024, the European Commission also released, jointly with the EEA, the first-ever European climate risk assessment.

Over the last three decades, since 1990, the EU has achieved steady decreases in its emissions, reaching a running total in 2022 of – 32.5 % ([132]). However, the EU and its Member States need to step up their implementation efforts and accelerate emissions reduction to stay on track to reach their targets of a 55 % reduction in net GHG emissions by 2030 and climate neutrality by 2050. Between 1990 and 2022, net GHG emissions of Greece decreased by 28%, making it one of the countries with below-average decrease.

The 'Fit for 55' legislative package reflects the need to speed up the green transition. It includes (i) strengthening and expanding the EU emissions trading system (ETS), with the creation of a new, second, ETS for transport and buildings together with a dedicated Social Climate Fund to help citizens during the transition; (ii) increasing targets under the effort sharing regulation; and (iii) a revised regulation for Land Use, Land Use Change and Forestry ([133]). The package has been fully adopted, and the Member States have been implementing the legislation.

The key strategic document at country level is the National Energy and Climate Plan (NECP) ([134]). Greece submitted its updated plan in December 2024 after the deadline set by the Regulation on the Governance of the Energy Union and Climate Action[135]. The European Commission assessed the plan and the extent to which Greece has followed the recommendations for the draft version. The findings from the assessment are:

- Emissions under the Effort Sharing Regulation will decrease by 43% in 2030 compared to 2005; Greece will meet its target of 23%.
- Greece is in line with its LULUCF target and target for the share of renewable energy.
- There are still gaps in energy efficiency targets that must be closed.

To minimise the impacts of climate policies on vulnerable people and sectors, Greece is using the Just Transition Fund, Modernisation Fund and will use Social Climate Fund from 2026. (for more information, see Chapter 5 on Finance).

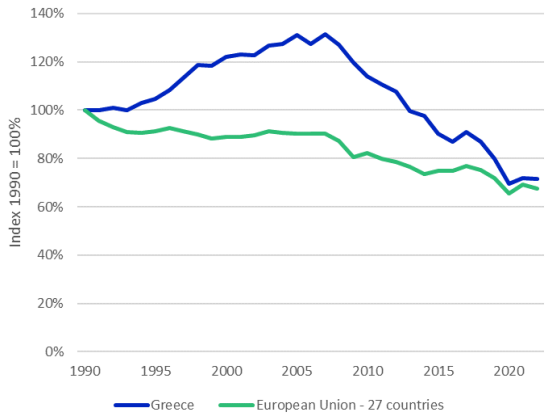
([132]) EU net domestic emissions, including the land use, land-use change and forestry (LULUCF) sector and excluding international aviation.

([133]) A full overview of the Fit for 55 package is available at https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/delivering-european-green-deal/fit-55-delivering-proposals_en.

([134]) More information about NECP is on the dedicated website https://energy.ec.europa.eu/topics/energy-strategy/national-energy-and-climate-plans-necps_en.

([135]) Article 14 of regulation 2018/1999 on the Governance of the Energy Union and Climate Action

Figure 28: Total GHG emissions (excluding international aviation) (%), 1990–2022



The EU emissions trading system

The EU ETS is the key tool for reducing GHG emissions cost-effectively across all Member States. It is the world's biggest carbon market, covering around 40% of the EU's total GHG emissions from electricity and heat generation, the manufacturing industry, aviation within Europe ([136]) and, from 2024, maritime transport also.

The system sets a limit or cap on the total amount of GHGs that can be emitted at the EU level. Within this limit, companies buy emissions allowances (one allowance gives the right to emit 1 t of CO_2 eq (carbon dioxide equivalent)), in auctions or through trading allowances with others. The cap is reduced annually to ensure that overall emissions in the sectors covered decrease over time.

The emissions under the ETS decreased by 64% from 2005 to 2023.

It is mainly due to the latest development. In Greece, GHG emissions covered by the EU emissions trading system (ETS) have been on a strong downward trend since 2019 and have reduced by 57 % since 2013, mostly thanks to the power generation sector. Emissions decreased between 2013 and 2022. However, in the industry sectors, GHG emissions have only decreased by 14 % since 2019, after having risen by 12 % between 2013 and 2019. In 2023, Greece's ETS installations emitted 37 % less GHG than in 2019 altogether. In 2023, 45 % of Greece's ETS emissions came from power generation. Of the total emissions from all industry sectors, cement and lime production accounted for 36 %, refineries for 42 %, other industries for 19 %, and chemicals and the metals industry for up to 2 % each.

From 2027, a new emissions trading system, called ETS 2, for buildings, road transport and additional sectors (mainly industry not covered by the current ETS) will become fully operational ([137]). Member States should have notified full transposition of the provisions of the revised EU ETS directive related to the new ETS 2 into national law by 30 June 2024. Greece did not communicate full transposition into national law by this deadline. The Commission therefore opened an infringement procedure against Greece on 25 July 2024, by sending a letter of formal notice for failing to fully transpose the provisions into national law.

Greece has since notified transposition of the relevant provisions of the ETS 2 Directive to the Commission. The monitoring and reporting requirements and the obligation to hold a permit to carry out activities under ETS 2 will commence on 1 January 2025.

The Commission also opened infringement procedures against Greece on 25 January 2024, by sending a letter of formal notice for failing to fully transpose previous revisions of the ETS Directive ([138]) into national law. Greece has since notified full transpositions of the abovementioned directives to the Commission.

Effort sharing

The Effort Sharing Regulation (ESR) ([139]) covers GHG emissions from domestic transport (excluding CO_2 emissions from aviation), buildings, agriculture, small industry and waste. Emissions from these sectors account for around 60 % of the EU's domestic emissions. The regulation sets the EU-wide target to reduce emissions from the effort sharing sectors by 40 % by 2030 compared to 2005 levels. This overall target for the EU translates to binding national emission reduction targets for each Member State. The target of Greece is – 22.7 %.

In addition to the 2030 targets, Member States have annual GHG emissions limits (annual emission allocations), reducing every year until 2030.

([136]) Flights between the EU Member States including departing flights to Norway, Iceland, Switzerland and the United Kingdom.

([137]) Directive (EU) 2023/959 (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2023.130.01.0134.01.ENG).

([138]) Directive - 2023/959 - EN - EUR-Lex and Directive - 2023/958 - EN - EUR-Lex.

([139]) Regulation (EU) 2018/842 (https://eur-lex.europa.eu/eli/reg/2018/842).

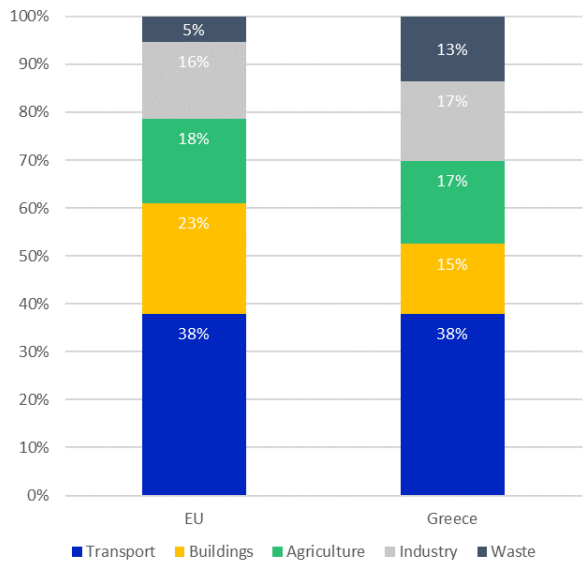
There is some flexibility to take account of annual fluctuations in emissions, by trading emissions and transfers from the ETS and LULUCF.

Based on historical emissions and the most updated projections, Greece is on track to achieve its 2030 ESR target. Projected emissions are 23.3 percentage points above its 2030 target.

The largest contributor is the domestic transport sector, which accounted for 38 % of all effort sharing emissions in 2022. Sustainable transport has yet to take off in Greece. Road transport is the dominant mode in Greece. Trains provide only 3 % of freight transport and 0.6 % of passenger transport, which is way below EU average of 16 % and 6 %, respectively. Only 0.1 % of car fleet were battery electric vehicles in 2023 (EU average is 1.2 %). On the other hand, Greece has about 3 200 publicly accessible charging points, or 1 for every 6 e-vehicles (above the EU average of 1:10).

The buildings sector is a significant concern for Greece as well. As per its most recent long term renovation strategy, Greece intends to reduce building energy consumption by 8 % in 2030 compared to 2015. However, between 2015 and 2022, final energy consumption in the residential sector declined only by 1 %. Emissions of the sector have not changed in the same period.

Figure 29: Effort-sharing emissions by sector (%), 2022



Land use, land-use change and forestry

The Land Use, Land-Used Change and Forestry (LULUCF) sector plays a significant role in achieving the EU's climate neutrality goal. In the EU, this sector absorbs more GHGs than it emits, removing significant volumes of carbon from the atmosphere. Thus, it is the only sector with negative emissions.

Greece's LULUCF sector has had approximately constant net removals since 2015.

Greece's target in 2030 is to enhance land removals by additional – 1.2 Mt of CO_2 equivalent compared to the yearly average of the period 2016–2018. The latest available projections show a gap to the 2030 target of −1.2 Mt of CO_2 equivalent. Therefore, Greece is on track to meet this target.

Adaptation to climate change

Halting all GHG emissions would still not prevent climate impacts that are already occurring. Therefore, adaptation to climate change is also a key component of climate policy.

Greece is in two out of three regions identified as hotspots of climate risks most affected by climate change – Southern Europe and low-lying coastal regions ([140]).

Greece is both vulnerable to the impacts of extreme weather events such as floods, coastal floods, droughts and heatwaves and at risk due to a persistently high climate protection gap. Wildfires are the highest risk, with a high economic impact historically. There are also risks to water management, but work has begun to assess FRMPs. Putting in place the right institutional settings is crucial to climate adaptation. Greece has made progress in understanding and monitoring the effects of climate change but faces challenges in implementing adaptation strategies, notably due to insufficient human and financial resources.

Greece adopted its national adaptation law in 2022 and has a national adaptation strategy and regional adaptation plans. There are no sectoral adaptation plans. The creation of a climate crisis and civil protection ministry is welcome, but it has not been assigned sufficient resources to effectively implement these policies.

The European Commission identified three priority actions in the 2022 edition of the EIR.

([140]) European Climate Risk Assessment (EUCRA). 2024. Available at European Climate Risk Assessment (europa.eu).

Greece has significantly accelerated the installation of renewable energy capacity and overall share of renewables is close to EU average. However, important challenges remain including grid capacity.

There is still little progress as regards the decarbonisation of the transport sector and the renovation of buildings stock. Greece needs to speed up both.

2025 priority actions

- Implement all polices and measures that are needed to achieve targets laid down in the Effort Sharing Regulation (ESR) and LULUCF regulation. More detailed priority actions are set out in the assessment of the final National Energy and Climate Plan (NECP)([141]).

([141]) National energy and climate plans

Part II: Enabling framework – implementation tools

5. Financing

The EU budget supports climate investment in Greece with significant amounts in 2021–2027, with revenues from the ETS also feeding into the national budget. During 2020–2022, Greece's revenues from auctioning reached EUR 2851 million in total, with all of it spent on climate and energy.

In addition, the annual investment needed to meet its environmental objectives in the areas of pollution prevention and control, the circular economy and waste, water protection and management, and biodiversity and ecosystems is estimated to be EUR 5.3 billion per year in Greece.

These four environmental areas currently receive total funding of around EUR 3 billion per year; thus, there is a gap of EUR 2.3 billion per year.

Of the environmental investment gap, EUR 1.4 billion concerns biodiversity and ecosystems, EUR 300–400 million each of pollution prevention and control and circular economy, and a further EUR 212 million the water objective.

Climate finance landmarks

EU funding for climate action

The EU budget supports climate action in the EU-27 with EUR 657.8 billion in the 2021–2027 budgetary period across the various programmes and funds, representing an overall 34.3 % contribution level. Of this, cohesion policy provides EUR 120 billion (over half of it through the ERDF), the recovery and resilience facility (RRF) EUR 275.7 billion and CAP EUR 145.9 billion ([142]).

In Greece, the EU cohesion policy (considering EU contribution amounts) provides EUR 6.2 billion for climate action in 2021–2027 (with around half of this via the ERDF), with a further EUR 185 million from the European Maritime, Fisheries and Aquaculture Fund (EMFAF) ([143]).

The RRF contributes to climate finance in Greece with EUR 13.7 billion up to 2026, representing 38.1 % of the recovery and resilience plan (RRP) ([144]).

The European Investment Bank (EIB) provided EUR 109.9 billion financing across the EU-27 between 2021 and mid 2024 to support energy, transport and industry projects that are aligned with the EU's climate objectives. Of this amount, EUR 2.5 billion was assigned to Greece in the reference period ([145]).

National financing, including EU emissions trading system revenues

Revenues from the auctioning of emission allowances under the EU ETS, which feed directly into national budgets, amounted to EUR 507 million in 2020, EUR 1 015 million in 2021 and 1 330 million in 2022, in Greece, totalling approximately EUR 2 851 million in the three-year period. In Greece, these revenues are earmarked and fully spent on domestic climate change and energy projects ([146]).

From the remaining part of the EU ETS revenues that feed into the Innovation Fund and the Modernisation Fund, further support is available to climate action at the EU level.

It should be noted that investment in climate action also supports the environment and, therefore, the environmental investments described in the following sections cannot be regarded as entirely additional to climate investment ([147]).

Environmental financing and investments

This section describes Greece's investment needs, current financing and gaps as they relate to the four environmental objectives beyond climate objectives,

([142]) European Commission, *Statement of Estimates of the European Commission – For the financial year 2025*, Publications Office of the European Union, Luxembourg, 2024, pp. 94–96 https://commission.europa.eu/document/download/7a0420e1-599e-4246-9131-ccb7d505d6d9_en?filename=DB2025-Statement-of-Estimates_1.pdf.

([143]) See the Cohesion Open Data Platform (https://cohesiondata.ec.europa.eu/).

([144]) EU Commission datasets and the Recovery and Resilience Scoreboard (https://ec.europa.eu/economy_finance/recovery-and-resilience-scoreboard/index.html).

([145]) A list of financed projects is provided by the EIB (https://www.eib.org/en/projects/loans/index.htm).

([146]) European Commission: Directorate-General for Climate Action, *Progress Report 2023 – Climate action*, Publications Office of the European Union, Luxembourg, 2023, https://climate.ec.europa.eu/news-your-voice/news/climate-action-progress-report-2023-2023-10-24_en.

([147]) NB: Indirect investments (from climate and other policies) in support of the environment are accounted for via the tracking.

namely tackling pollution, the circular economy and waste, water protection and management, and biodiversity and ecosystems ([148]).

The environment overall

Investment needs

The overall environmental investment needs to be sufficient to enable Greece to meet its objectives in the areas of pollution prevention and control, the circular economy and waste, water protection and management, and biodiversity and ecosystems. The required investment is estimated to be EUR 5.3 billion per year (in 2022 prices).

A significant part of the estimated requirement, around EUR 2.1 billion per year, can be attributed to the need to support biodiversity and ecosystems, with a further EUR 1.3 billion needed for pollution prevention and control, EUR 1.1 billion for circular economy and EUR 0.9 billion for water (in 2022 prices).

Current investments

To implement the environmental investments needed, the available financing is estimated to currently reach an annual EUR 3 billion in Greece from EU and national sources combined (in 2022 prices).

Total environmental funding from the multiannual financial framework (MFF) is estimated to reach around EUR 8.5 billion for Greece in total, during 2021–2027 (or EUR 1.2 billion per year).

Table 1: Key environmental allocations from EU funds to Greece (million EUR), 2021–2027

Instrument	Allocations
Cohesion policy	**4 703.8** ([a])
ERDF	2 705.5
Cohesion Fund	1 833
Just Transition Fund	165.4
CAP	**2 972.2** ([b])
European Agricultural Guarantee Fund	2 039.6
European Agricultural Fund for Rural Development	932.6
EMFAF	**148.2**
Other MFF sources	663.8 ([c])
RRF ([d]) (2021–2026)	**6 890**

([a]) European Commission, 2021-2027 cohesion policy (planned) allocations in *EU amount* excluding national co-financing, based on the tracking in the Common Provisions Regulation (CPR, 2021) Annex I. Please note potential data changes that may have arisen between the EIR preparation cut-off date (31 October 2024) and its publication date. Source and further information: https://cohesiondata.ec.europa.eu/2021-2027-Categorisation/2021-2027-Planned-finances-detailed-categorisation/hgyj-gyin/about_data.

([b]) Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP strategic plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013 (OJ L 435 6.12.2021, p. 1), Annex XI, https://eur-lex.europa.eu/eli/reg/2021/2115.

Note that 2021-2027 combines factual data for 2021 and 2022 and expenditure under the relevant specific objectives (SOs) of the CAP strategic plans from 2023, using the EU biodiversity tracking methodology (https://commission.europa.eu/system/files/2023-06/Biodiversity%20tracking%20methodology%20for%20each%20programme%202023.pdf). Source: European Commission.

([c]) Space Fund, Horizon Europe, LIFE and the Connecting Europe Facility.

([d]) Outside the MFF. Note that the RRF applies a similar environmental tracking scheme (set in the RRF Regulation, Annex VI) as the EU's cohesion policy. RRF dataset version used: July 2024, prior to 2025 revisions. Data source: European Commission.

Greece, in addition to receiving EU funds earmarked specifically for it in 2021–2027, can also benefit from funding programmes that can be accessed at the EU level and which are open to all Member States. These include the LIFE programme (EUR 5.4 billion) ([149]), Horizon Europe (EUR 95.5 billion ([150])), the Connecting Europe Facility

([148]) Research, development and innovation is accounted for under each environmental objective. The financing needs, baselines and gap estimates are based on the Directorate-General for Environment's internal analysis (of 2024). Throughout this chapter, specific references are provided to the most important data sources used.

([149]) https://cinea.ec.europa.eu/programmes/life_en.

([150]) European Commission, Horizon Europe , https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-europe_en.

(EUR 33.7 billion) ([151])and funds that can be mobilised through the InvestEU programme ([152]).

Greece's RRP supports climate objectives through funding of EUR 13.7 billion (38.1 % of total), with an additional EUR 1.36 billion (3.8 % of total) for the environment.

The EIB provided around EUR 1.2 billion in environment-related financial contributions to Greece from 2021 to mid 2024, most of which, EUR 983.2 million (81 %) was in the area of sustainable energy, transport and industrial projects, which provides significant co-benefits to reducing air pollution, environmental noise and other pollution.

The EU's total national expenditure on environmental protection (operating plus capital expenditure) was EUR 298 billion in 2020 and EUR 321 billion in 2021, representing around 2.2 % of EU-27 GDP. In Greece, the total national environmental protection expenditure was EUR 2.4 billion in 2020 and EUR 2.5 billion in 2021, representing 1.5 % and 1.4 % of GDP, respectively.

Of the total environmental expenditure, the national capital expenditure (investment) on environmental protection amounted to EUR 54.5 billion in 2020 and EUR 59.9 billion in 2021 in the EU-27, representing around 0.4 % of the EU's GDP. In Greece, the national environmental protection investment reached EUR 376 million in 2020, falling to EUR 358 million in 2021, representing around 0.2 % of GDP.

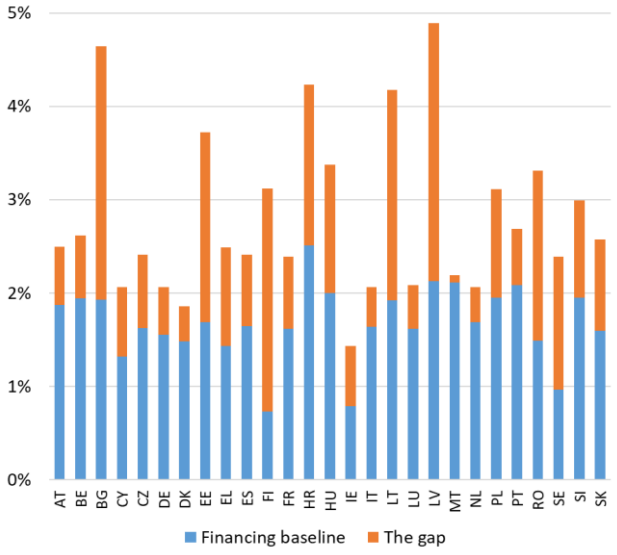
Splitting by institutional sector, 93 % of Greece's national environmental protection investment (capital expenditure) comes from the general government budget, with 3.3 % coming from specialist private-sector producers (of environmental protection services, such as waste and water companies) and 3.7 % from the general business sector, whose environmental activities are usually ancillary to its main activities. At the EU level, 38 % of environmental protection investment comes from governments, 40 % from specialist private-sector producers and 22 % from the general business sector ([153]).

Greece's total financing for environmental investment reaches an estimated EUR 3 billion per year (in 2022 prices), including EU funding and national public and national private expenditure. Of the total, the share of EU funds (including EIB funds) reaches 74 %, with around 26 % national financing. The total public financing (EU plus national public) represents 98 % of the total.

The gap

To meet its four environmental objectives beyond climate change, the additional investment need over the current levels (i.e. the gap) reaches an estimated EUR 2.3 billion per year in Greece, representing around 1.12 % of the national GDP, being higher than the EU average (0.77 %).

Figure 30: Environmental financing, needs and gaps per Member State (% of GDP)



Source: Analysis of Directorate-General for Environment.

The following table provides the distributions of Greece's environmental investment gap (expressed in various forms) by environmental objective.

Table 2: Summary of environmental investment gaps in Greece per year, 2021–2027

Environmental objective	Investment gap per year		
	Million EUR (2022 prices)	% of total	% of GDP
Pollution prevention and control	349	15.0	0.17
Circular economy and waste	379	16.3	0.18
Water management and water industries	212	9.1	0.10
Biodiversity and ecosystems	1 391	59.7	0.67

([151]) The Connecting Europe Facility Transport part also includes EUR 11.3 billion transferred from the Cohesion Fund, of which 30 % will be made available, on a competitive basis, to all Member States eligible for the Cohesion Fund. The remaining 70 % will respect the national envelopes until 31 December 2023.

([152]) The InvestEU Fund is set to mobilise over EUR 372 billion of investment through an EU budget guarantee of EUR 26.2 billion to back the investment of financial partners such as the EIB group and others.

([153]) Eurostat, 'Environmental protection expenditure accounts', env_ac_epea.

Total	**2 331**	**100.0**	**1.12**

Source: Directorate-General for Environment analysis.

Pollution prevention and control

Investment needs

In pollution prevention and control, Greece's investment needs are estimated to reach EUR 1.3 billion per year (including baseline investments) in 2021–2027. Most of this, EUR 1.2 billion, relates to air pollution control, to comply with the clean air requirements for the five main air pollutants under the NECD by 2030. The estimated needs to reduce environmental noise reach EUR 316 million per year, most of which is delivered by the (same) sustainable energy and transport investments that also benefit clean air ([154]). Industrial site remediation requires an estimated EUR 38 million per year. Microplastics pollution and the chemicals strategy require around EUR 20–30 million per year (each) ([155]).

Current investments

The current investment levels supporting pollution prevention and control reach an estimated EUR 962 million per year in Greece in the 2021–2027 period. Most of the financing concerns clean air (EUR 918 million per year). Protection from environmental noise receives around EUR 147 million per year, with a further EUR 13 million for site remediation.

In Greece, the EU MFF provides an estimated 22 % of the clean air financing (mostly via cohesion policy), with a further 62.5 % from the RRF, adding up to 84.5 % of the total. EIB financing contributes 13.7 % and national sources reach 2 % ([156]).

The gap

To meet its environmental objectives concerning pollution prevention and control (towards zero pollution), Greece needs to provide an additional EUR 349 million per year (0.17 % of GDP), mostly related to clean air and noise. The adequate implementation of the NECP with the investments included for sustainable energy and transport would largely deliver this, while in many Member States additional measures and investments may be required to comply with the ammonia reduction requirements.

According to the latest (2023) NAPCP review report ([157]), Greece complied with ammonia reduction requirements in 2020 and 2021, and it is not at risk of non-compliance with ammonia concerning the NECD's 2030 emission reduction commitments, based on the policies and measures) in its NAPCP that take into account climate, energy and CAP plans and financing baselines.

Circular economy and waste

Investment needs

Greece's investment needs in circular economy and waste reach EUR 1.1 billion per year (including baseline investments). Around half of this, around EUR 0.5 billion per year, relates to circular economy measures in the mobility, food and built environment systems, with a further EUR 0.5 billion necessary for waste management (municipal and packaging waste), covering waste collection, biowaste treatment, recycling reprocessors, waste-sorting facilities, and digitalisation of the waste registry. The amount for waste excludes the investments needed for the uptake of circularity and waste prevention across the economy ([158]).

Current investments

Circular economy investments across the economy reach around EUR 214 million per year in Greece in 2021-2027, with a further EUR 456 million provided for waste management that does not constitute circular economy.

Around 20 % of this combined financing for circularity and waste comes from the EU MFF, with a further 19 % from the RRF, adding up to 39 % of the total. EIB loans identified

([154]) 2021 Phenomena project assessment (https://op.europa.eu/en/publication-detail/-/publication/f4cd7465-a95d-11eb-9585-01aa75ed71a1) and the Commission's 2023 Environmental Noise Directive implementation report (https://environment.ec.europa.eu/system/files/2023-03/COM_2023_139_1_EN_ACT_part1_v3.pdf).

([155]) European Commission, *Third Clean Air Outlook*, Brussels, 2022, https://environment.ec.europa.eu/topics/air/clean-air-outlook_en. See also the impact assessment for the revision of the AAQD, available from the Commission web page on the proposed revision (https://environment.ec.europa.eu/publications/revision-eu-ambient-air-quality-legislation_en).

([156]) Through the tracking of EU funds, EIB projects and national expenditure (EPEA accounts, Eurostat). Note that the bulk of clean air financing is provided as a contribution from climate (energy and transport) measures, as per the tracking schemes in the Common Provisions Regulation Annex I and the RRF Regulation Annex VI. Further information on clean air tracking: https://commission.europa.eu/document/download/0a80484e-2409-4749-94c6-3b23bc6bae8f_en?filename=Clean%20air%20methodology_0.pdf

([157]) European Commission, 'National air pollution control programmes and projections', European Commission website, https://environment.ec.europa.eu/topics/air/reducing-emissions-air-pollutants/national-air-pollution-control-programmes-and-projections_en.

([158]) See Systemiq and Ellen MacArthur Foundation, *Achieving 'Growth Within'*, 2017; and European Commission: Directorate-General for Environment, *Study on investment needs in the waste sector and on the financing of municipal waste management in Member States*, Publications Office of the European Union, Luxembourg, 2019, https://op.europa.eu/en/publication-detail/-/publication/4d5f8355-bcad-11e9-9d01-01aa75ed71a1.

in support of circularity and waste represent 2 % of the total. The share of national sources is absolutely overwhelming, reaching 59 % of the total financing ([159]).

The gap

To meet its environmental objectives concerning the circular economy and waste, Greece needs to increase circular economy investments by an estimated EUR 310 million per year, with an additional EUR 69 million concerning waste management action, not belonging to circular economy. Combined, this amounts to EUR 379 million per year, representing 0.18 % of Greece's GDP.

Of the circular economy gap, EUR 81 million relates to recent initiatives, such as the eco-design for sustainable products, packaging and packaging waste, labelling and digital tools, CRM recycling, and measures proposed under the amendment of the Waste Framework Directive, and EUR 229 million constitutes further investment need to unlock Greece's circular economy potential.

Water protection and management

Investment needs

The annual water investment needs reach an estimated EUR 1 871 million (in 2022 prices) in Greece. This comprises investment needs both for the water industry and for the protection and the management of water. A large part of the total annual need, EUR 442 million, relates to drinking water, with a further EUR 284 million necessary for wastewater-related investments and around EUR 127 million for the protection and management of water ([160]).

Current investments

Water investments in Greece are estimated to be around EUR 659 million per year (in 2022 prices) in 2021–2027. Of this, EUR 370 million supports drinking water, EUR 163 million wastewater management and around 118 million the other aspects of the Water Framework Directive (water management and protection).

Of the total financing, 30.9 % is provided by the EU MFF (mostly through cohesion policy), with a further 12.1 % from the RRF, reaching 43 % combined. EIB financing is around2.6 % of the total, while the bulk of financing comes from national sources (54.5 %) ([161]).

The gap

To meet the various environmental targets under the Water Framework Directive and the Floods Directive, Greece's water investment gap reaches EUR 212 million per year (0.11 % of GDP), with over half related to wastewater management (EUR 122 million per year). Drinking water measures require an additional EUR 72 million per year and the other aspects of the Water Framework Directive around EUR 10 million per year over the existing levels of financing.

Biodiversity and ecosystems

Investment needs

The investment needs for biodiversity and ecosystems are estimated to be EUR 2.1 billion per year (in 2022 prices) in Greece in 2021–2027. This includes the following financing needs:

(i) Greece's PAF ([162]) concerning the Natura 2000 areas: EUR 149 million per year, mostly running costs;
(ii) additional BDS costs ([163]): EUR 1.4 billion per year on top of the PAF;
(iii) sustainable soil management costs ([164]): EUR 543 million per year.

Current investments

The current level of biodiversity financing is estimated to be EUR 704 million per year (in 2022 prices) in 2021–2027. 59.5 % of this is considered direct financing to biodiversity and ecosystems, with a 100 % coefficient in the tracking schemes.

([159]) Waste management and circular economy expenditure tracking in the EU funds, EIB projects and in the national expenditure (Eurostat). Datasets: EPEA accounts (env_epi) and circular economy private investments (cei_cie012).

([160]) See European Commission, 'Estimating investment needs and financing capacities for water-related investment in EU Member States', 28 May 2020, https://commission.europa.eu/news/estimating-investment-needs-and-financing-capacities-water-related-investment-eu-member-states-2020-05-28_en; and OECD (Organisation for Economic Co-operation and Development), *Financing Water Supply, Sanitation and flood Protection: Challenges in EU Member States and policy options*, OECD Publishing, Paris, 2020, https://www.oecd-ilibrary.org/environment/financing-water-supply-sanitation-and-flood-protection_6893cdac-en.

([161]) Water investment levels are estimated through tracking EU funds, EIB projects and national expenditure (EPEA accounts, Eurostat).

([162]) European Commission, 'Financing Natura 2000 – Prioritised action frameworks', European Commission website, https://environment.ec.europa.eu/topics/nature-and-biodiversity/natura-2000/financing-natura-2000_en.

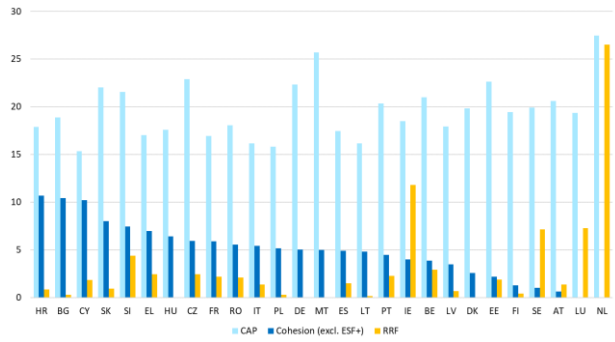
([163]) See European Commission: Directorate-General for Environment, *Biodiversity Financing and Tracking – Final report*, Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/793eb6ec-dbd6-11ec-a534-01aa75ed71a1/language-en.

([164]) See Proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law) COM(2023) 416 final of 5 July 2023, https://environment.ec.europa.eu/publications/proposal-directive-soil-monitoring-and-resilience_en.

15.1 % of the total financing is estimated to come from EU cohesion policy, 56 % from CAP, 2 % from EMFAF, 6.4 % from Horizon Europe and around 2.5 % from LIFE. The EU MFF altogether accounts for 83 % of the financing and the RRF for 16.3 %, adding up to a total of 99.5 % from the EU budget. The rest, 0.5 %, comes from national sources ([165]).

Greece has envisaged 7.0 % of the cohesion policy EU contribution amount (disregarding ESF+) and 2.5 % of the RRF funds to be investments into biodiversity, which are relatively high shares compared with the EU average. While Greece also dedicates an estimated share of 17 % of its CAP budget to supporting biodiversity over 2021–2027, this is slightly below the EU average (see Figure 31).

Figure 31: 2021–2027 contributions to biodiversity from the main EU instruments per Member State (% of policy total)



NB: ESF+, European Social Fund Plus.

The gap

To meet the environmental objectives concerning the protection and restoration of biodiversity and ecosystems and other relevant cross-cutting measures, Greece's investment gap is estimated to be around EUR 1.4 billion per year, corresponding to 0.67 % of its GDP.

Public financial management

Green budgeting practices

Green budgeting refers to the use of budgetary tools to achieve climate and environmental goals. Some Member States, including Greece, already use green budgeting tools for identifying and tracking green expenditures and/or revenues ([166]). Green budgeting practices provide increased transparency on the environmental implications of budgetary policies.

The Commission has developed a non-mandatory green budgeting reference framework that brings together methodologies for assessing the impacts of budgets on climate and environmental goals ([167]).

To help Member States develop national green budgeting and thereby improve policy coherence and support the green transition, the Commission facilitated a technical support instrument (TSI) project on green budgeting from 2021 to 2024 ([168]). Greece participated and introduced a national green budgeting methodology.

Beyond green budgeting, to improve policy outcomes, the Commission has also drawn up climate-proofing and sustainability-proofing guidance ([169]), as tools to assess project eligibility and compliance with environmental legislation and criteria.

Green taxation and tax reform

Total environmental taxes amounted to EUR 11.6 billion in Greece in 2022, representing 5.6 % of its GDP (EU average: 2.0 %). Energy taxes formed the largest component of environmental taxes, accounting for 4.8 % of GDP, which is higher than the EU average of 1.6 %. Transport taxes, at 0.76 % of GDP, were above the EU average (0.4 %), while taxes on pollution and resources, at 0.04 %, were below average (EU average: 0.08 %). In 2022, environmental taxes in Greece accounted for 13.6 % of total revenues from taxes and social security contributions (above the EU average of 5.0 %) ([170]).

([165]) Based on biodiversity tracking in the EU budget (https://circabc.europa.eu/ui/group/3f466d71-92a7-49eb-9c63-6cb0fadf29dc/library/8e44293a-d97f-496d-8769-50365780acde), and national expenditure into biodiversity from the Classification of the Functions of Government accounts.

([166]) European Commission, *Green Budgeting in the EU. Key Insights from the 2023 European Commission Survey of Green Budgeting Practices*, 2023, https://economy-finance.ec.europa.eu/economic-and-fiscal-governance/national-fiscal-frameworks-eu-member-states/green-budgeting-eu_en#:~:text=European%20Commission%20Green%20Budgeting%20Survey%C2%A0.

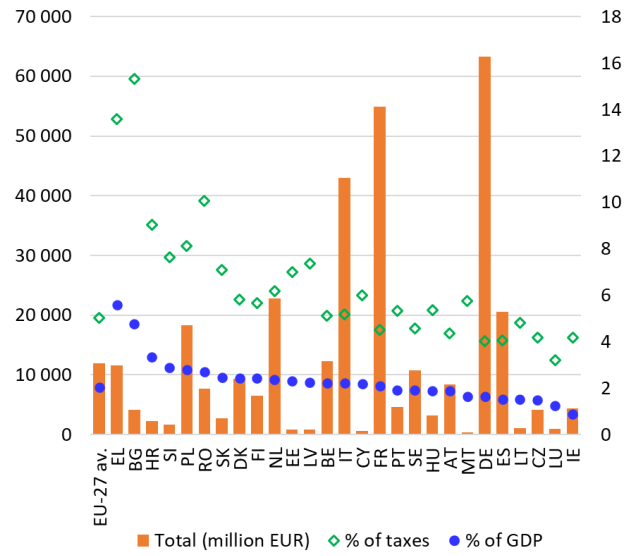
([167]) European Commission, 'European Union green budgeting reference framework', 2022, https://economy-finance.ec.europa.eu/economic-and-fiscal-governance/green-budgeting-eu_en.

([168]) https://reform-support.ec.europa.eu/what-we-do/revenue-administration-and-public-financial-management/supporting-implementation-green-budgeting-practices-eu_en.

([169]) Commission notice – Technical guidance on the climate proofing of infrastructure in the period 2021–2027 (OJ C 373, 16.09.2021, p. 1), https://op.europa.eu/en/publication-detail/-/publication/23a24b21-16d0-11ec-b4fe-01aa75ed71a1/language-en.

([170]) Eurostat, 'Environmental taxes accounts', env_eta.

Figure 32: Environmental taxes per Member State, 2022



The EU Green Deal emphasises the role of well-designed tax reforms (e.g. shifts from taxing labour to taxing pollution) to boost economic growth and resilience, and to foster a fairer society and a just transition through the right price signals. The Green Deal promotes the 'polluter-pays principle', which makes polluters bear the costs to prevent, control and remedy pollution.

According to a 2024 study ([171]), Greece applies landfill taxes to quantities of untreated municipal waste, as well as residues from municipal waste treatment, being landfilled; product charges (levies on plastics); and user charges (charges for visits to national parks, hunting and fishing taxes).

Green bonds and sustainable bonds

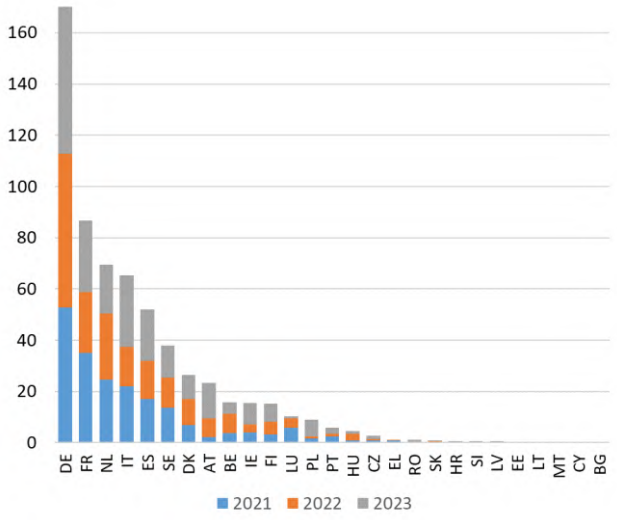
In 2023, the total value of green bonds issued by Member States was USD 245 billion (EUR 227 billion), up from USD 234 billion (EUR 198 billion) in 2021 ([172]).

During 2021–2023 combined, Greece issued green bonds worth USD 1.4 billion (EUR 1.2 billion). Of this, there was no issuance in 2023.

During 2014–2023, 83 % of the green bonds issued by European countries (excluding supranational entities) served objectives in energy, buildings or transport, while 5 % supported objectives in water, 5.1 % related to land use (with links to nature and ecosystems) and 3.8 % applied to waste management. By 2023, the combined share of energy, buildings and transport had decreased to 73 %, the shares of waste management and land use had increased (to 5.9 % and 8.4 %, respectively) and the share of water had remained around 5 %.

In 2021–2023, 31.7 % of the European green bonds (excluding supranational issuances) was issued by financial corporates, 29.1 % by sovereign governments and 23.1 % by non-financial corporates. 8.3 % of the issuances was linked to government-backed entities, 6.4 % to developments banks and 1.4 % to local governments.

Figure 33: Value of green bonds issued per Member State (billion EUR), 2021, 2022 and 2023



Data source: Climatebonds.net, with some additional data from national sources (e.g. Croatia, Slovenia).

Environmentally harmful subsidies

Addressing and phasing out environmentally harmful subsidies, in particular fossil fuel subsidies (FFS), is a further step towards achieving the eighth environment action programme objectives and the enabling conditions ([173]). FFS are costly for public budgets and make it difficult to achieve European Green Deal objectives.

The overall downward trend of FFS mentioned in past EIRs was disrupted from 2022 due to the European response to

([171]) European Commission: Directorate-General for Environment, *Candidates for Taxing Environmental Bads at National Level*, Publications Office of the European Union, Luxembourg, 2024, Annex 1, https://op.europa.eu/en/publication-detail/-/publication/35c1bbdf-2931-11ef-9290-01aa75ed71a1/language-en.

([172]) Climate bonds initiative (https://www.climatebonds.net/). NB. Additionally (and not included in this), national sources indicated EUR 544.8 million issuance for Croatia, in 2022-2023, and a slightly higher amount for Slovenia (+0.27 billion) during 2021-2023 in total.

([173]) Article 3(h) and 3(v) of the eighth environment action programme.

the 2021 energy crisis and subsequent increase in energy prices.

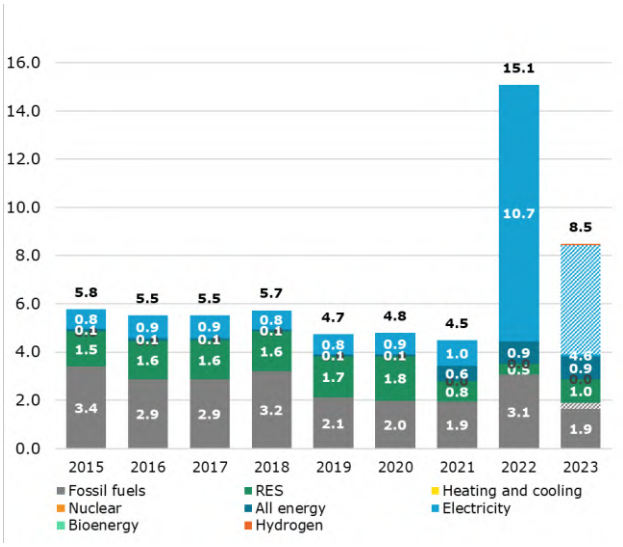
As a direct consequence, annual FFS in the EU have increased to EUR 103 billion in 2023 from EUR 57 billion in 2020. From 2021 to 2023, there was a marked increase in annual FFS of 72 % in the EU ([174]).

For the majority of the Member States (16), the year 2022 saw a peak in the amount of overall FFS. A decline was then observed in 2023 ([175]). In particular, FFS for coal and lignite, natural gas and oil increased in 2022 and a strong increase was observed for natural gas subsidies.

In Greece, the energy subsidies followed a decreasing trend between 2015 and 2021, including FFS, which decreased from EUR 3.4 billion (in 2015) to EUR 1.9 billion (in 2021). However, 2022 saw a jump in overall energy subsidies (mainly for electricity), with FFS increasing to EUR 3.1 billion, but returning to 2021 levels in 2023.

As a share of GDP, FFS in 2022 ranged from 1.8 % in Croatia to less than 0.1 % in Denmark and Sweden. Greece's value reached 1.5 %, above the EU average (0.8 %) ([176]).

Figure 34: Energy subsidies by energy carrier (billion EUR), 2015–2023



NB: RES, renewable energy source.

Source: analysis of Directorate-General Energy

The 2022 EIR included the following recommendations.

- Prepare an environmental financing strategy to maximise opportunities to close environmental implementation gaps, including by increasing environmental taxation and/or private financing for the environment.
- Tackle the main environmental challenges affecting the country, through adequate funding, including through the mobilisation of investments and the use of EU funds.

An environmental investment gap of 1.1 % of the GDP is observed in Greece, mainly related to biodiversity and ecosystems. This necessitates further efforts in this area.

2025 priority action

In light of the observed gap, the following recommendation is made for Greece, repeating the second action from the 2022 EIR.

- Use more national funding (for instance by increasing taxes in favour of the environment and reducing environmentally harmful subsidies), EU funding and private funding to help close the investment gap.

([174]) European Commission, 2024 Report on Energy Subsidies in the European Union, COM(2025), https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2025)17&lang=en

([175]) 16 Member States: BE, EE, IE, EL, ES, FR, HR, IT, CY, LT, HU, NL, AT, PT, RO and SE.

([176]) European Commission, 2024 Report on Energy Subsidies in the European Union, COM(2025), https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2025)17&lang=en

6. Environmental governance

Information, public participation and access to justice

Citizens can more effectively protect the environment if they rely on the three 'pillars' of the Aarhus Convention: (i) access to information, (ii) public participation in decision-making and (iii) access to justice in environmental matters. It is of crucial importance to public authorities, the public and businesses that environmental information is shared efficiently and effectively ([177]). Public participation allows authorities to make decisions that take public concerns into account. Access to justice is a set of guarantees that allows citizens and NGOs to use national courts to protect the environment, safeguard the rights of citizens and ensure accountability of authorities ([178]). It includes the right to bring legal challenges ('legal standing') ([179]).

Environmental information

This section focuses on the implementation of the Infrastructure for Spatial Information in the European Community (Inspire) Directive. The Inspire Directive aims to set up a European spatial-data infrastructure for sharing environmental spatial information between public authorities across Europe. It is expected that this will help policymaking across boundaries and facilitate public access to this information. Geographic information is needed for good governance at all levels and should be readily and transparently available.

Table 3: Greece dashboard on implementation of the Inspire Directive, 2016–2023

	2016	2023
Effective coordination and data sharing		
Ensure effective coordination	🟨	🟩
Data sharing without obstacle	🟨	🟨
Inspire performance indicators		
(i) Conformity of metadata	🟥	🟩
(ii) Conformity of spatial datasets ([a])	🟨	🟩
(iii) Accessibility of spatial datasets through view and download services	🟨	🟩
(iv) Conformity of network services	🟥	🟥

Legend

🟩 Implementation of this provision is well advanced or (nearly) completed. Outstanding issues are minor and can be addressed easily. Percentage > 89 %

🟨 Implementation of this provision has started and made some or substantial progress, but is still not close to being completed. Percentage = 31–89 %

🟥 Implementation of this provision is falling significantly behind. Serious efforts are necessary to close the implementation gap. Percentage < 31 %

([a]) In 2016, the deadlines for implementation of spatial data interoperability were still in the future: 23 November 2017 for Annex I data and 21 October 2020 for Annex II and III data. It must also be considered that this indicator will in many cases never reach 100 % conformity, as the majority of countries provide as-is datasets in addition to the Inspire-harmonised datasets.

Source: European Commission, 'Greece', Inspire Knowledge Base, https://knowledge-base.inspire.ec.europa.eu/greece_en.

Greece's performance in implementing the Inspire Directive is substantial and has been reviewed based on its 2023 country fiche ([180]) (see Table 3).

([177]) The Aarhus Convention (https://unece.org/environment-policy/public-participation/aarhus-convention/text), the Access to Environmental Information Directive (Directive 2003/4/EC) (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32003L0004) and the Inspire Directive (Directive 2007/2/EC) (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32007L0002) together create a legal foundation for the sharing of environmental information between public authorities and with the public.

([178]) These guarantees are explained in the European Commission's 2017 notice on access to justice in environmental matters (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52017XC0818(02)) and a related 2018 citizen's guide (https://op.europa.eu/en/publication-detail/-/publication/2b362f0a-bfe4-11e8-99ee-01aa75ed71a1/language-en/format-PDF).

([179]) This EIR focuses on the means used by Member States to guarantee rights of access to justice and legal standing and to overcome other major barriers to bringing cases on environmental protection.

([180]) European Commission, 'Greece', Inspire Knowledge Base, https://knowledge-base.inspire.ec.europa.eu/greece_en.

In 2022, Greece received a priority action on the need to make spatial data more widely accessible and prioritise environmental datasets ([181]). Greece has made good progress on the accessibility of spatial data, but more efforts are needed. The 2022 priority action is repeated.

Public participation

Public involvement at both the planning and the project phase maximises transparency and social acceptance of programmes and projects. Consultation with the public (including NGOs) and environmental, local and regional authorities is a key feature of an effective impact assessment procedure. Such consultation also provides an opportunity for public authorities and project promoters to engage with the public actively and meaningfully by making information on the likely significant effects widely available. If carried out with due diligence and taking into consideration useful public input, this process leads to better-informed decision-making and can promote public acceptance. Making information available increases stakeholder involvement, thus lessening resistance and preventing (or minimising) litigation. On the other hand, it is paramount that the procedure is effective.

This section examines how public involvement and transparency are ensured under two instruments, i.e. the Environmental Impact Assessment (EIA) Directive ([182]) and the Strategic Environmental Assessment (SEA) Directive ([183]).

EU law provides for a flexible framework concerning EIAs. The aim of this framework is to ensure the application of the necessary environmental safeguards, while enabling speedy approval of projects. The Commission has contributed to simplifying and accelerating permitting for renewable energy projects and continues to support the Member States in this regard ([184]). Greece has not taken steps aiming to accelerate permit-issuing procedures taking advantage of the broad flexibilities offered by the EU legal framework.

The average speed in the EU for issuing permits involving an EIA procedure is 20.6 months, with a minimum duration of 11.4 months and a maximum duration of 75.7 months ([185]). The duration of each step in an EIA process (screening, scoping, EIA report, public consultation, reasoned conclusion, development consent) varies considerably between Member States and projects. The available data for Greece show that the average duration of the EIA process appears to be faster than the EU average, but definitive conclusions cannot be drawn, as the information on the duration of the screening phase is missing. Effective use of EU procedures can positively influence the timely approval of activities underpinning the decarbonisation of the economy on the way to net zero by 2050.

A new report is not yet available on the application and effectiveness of the SEA Directive in the EU. Nevertheless, a support study has been published with information by Member State ([186]).

The Ministry of Environment and Energy maintains the Digital Environmental Register (Ηλεκτρονικό Περιβαλλοντικό Μητρώο) ([187]), which enables citizens and environmental organisations to monitor the progress of any environmental authorisation, including those under the EIA Directive, and its results. User registration is required. Public consultation is, in principle, carried out exclusively through this online system. It is not clear if an assessment has been made of how effective the website is in facilitating public participation. In any event, the legislation (Article 3, paragraph 1.1(b), of Joint Ministerial Decision 1649/45/2014) provides an additional action for the competent environmental authority, which consists of informing the appropriate regional council of the start of the public consultation. The related announcement is posted in the register and is also provided electronically by the same regional council.

For the SEA Directive, the website of the Ministry of Environment and Energy includes a consultation (*διαβούλευση*) section, where SEAs for plans or programmes are announced, with an accompanying

([181]) The European Commission provides a list of high-value spatial datasets (https://github.com/INSPIRE-MIF/need-driven-data-prioritisation/blob/main/documents/eReporting_PriorityDataList_V2.1_final_20201008.xlsx).

([182]) Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 26, 28.1.2012, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011L0092.

([183]) Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (OJ L 197, 21.7.2001, p. 30), https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32001L0042.

([184]) Commission Staff Working Document (SWD/2022/0149 final), 18 May 2022, (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022SC0149&qid=1653034229953).

([185]) European Commission: Directorate-General for Environment, *Collection of information and data on the implementation of the revised Environmental Impact Assessment (EIA) Directive (2011/92/EU) as amended by 2014/52/EU)*, Publications Office of the European Union, Luxembourg, 2024, Tables 5 and 6, https://op.europa.eu/en/publication-detail/-/publication/8349a857-2936-11ef-9290-01aa75ed71a1/.

([186]) European Commission: Directorate-General for Environment, Lundberg, P., McNeill, A., McGuinn, J., Cantarelli, A. et al., *Study supporting the preparation of the report on the application and effectiveness of the SEA Directive (Directive 2001/42/EC) – Final study*, Publications Office of the European Union, 2025, https://data.europa.eu/doi/10.2779/1615072

([187]) https://eprm.ypen.gr/.

invitation for interested members of the public to submit their views. Information on where the public can access the relevant documents is also provided; in some cases, some of the documents may also accompany the announcement of the SEA.

There is still a lack of data available on the level of participation in decision-making processes, including authorisations linked to the EIA Directive (Directive 2011/92/EU) and the SEA Directive (Directive 2001/42/EC).

Access to justice

Access to justice, guaranteed by Article 19(1) of the Treaty on European Union and Article 47 of the EU Charter of Fundamental Rights, is a fundamental right and part of the democratic process. It is vital to ensure the full application of EU law in all Member States and the legal protection of the rights of individuals, including in environmental matters. Access to justice is essential to enable judicial review of the decisions of public authorities and to allow the correction of any wrongdoing committed by these authorities.

This section provides a snapshot of the state of play of access to courts by the public, particularly when it comes to challenging plans, or the non-adoption of plans, under EU law, in the areas of water, waste, air quality and noise, irrespective of the form of the legal act (i.e. regulatory act or administrative decision).

As mentioned in the 2022 EIR, anyone, any group of people acting together or any environmental NGO has the right to appeal before the courts to protect the environment by proving a specific, legitimate interest regarding their case ([188]).

2025 priority actions

- Make spatial data more widely accessible and prioritise environmental datasets in implementing the Inspire Directive, especially those identified as high-value spatial datasets for implementing environmental legislation
- Ensure that relevant information on EIA and SEA procedures (including on public participation opportunities and on publication of final decisions) is electronically accessible in a timely manner, through at least a central portal or easily accessible points of access, at the appropriate administrative level.
- Ratify the amendment to the United Nations Economic Commission for Europe Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

Compliance assurance

Environmental compliance assurance covers all work undertaken by public authorities to ensure that industries, farmers and others fulfil their obligations to protect water, air and nature, to manage waste ([189]) and to remedy any environmental damage. It includes measures such as (i) compliance promotion, (ii) compliance monitoring (i.e. inspections and other checks), (iii) enforcement, that is, steps taken to stop breaches and impose sanctions, and (iv) ensuring damage prevention and remediation in line with the polluter-pays principle.

Compliance promotion, monitoring and enforcement

Non-compliance with environmental obligations may occur for different reasons, including poor understanding or lack of acceptance of the rules, opportunism or even criminality. Compliance promotion activities help duty-holders to comply by providing information, guidance and other support. This is particularly important in areas where new and complex legislation is put in place.

When inspections and other control activities identify problems, a range of responses may be appropriate, including the use of administrative and criminal enforcement tools.

The Environmental Inspectorate has created an electronic Registry of Projects and Activities of categories A1 and A2 (in accordance with the EIA Directive and its related annexes, which have been transposed into national law). Based on this registry and considering, among other things, the environmental risk analysis from the operation of the activities contained in it, the five-year national plan of environmental inspections for 2024–2029 was drawn up.

The inspectorate, in cooperation with the competent decentralised regional authorities, prepared the programme of regular environmental inspections, including the planned frequency of on-site visits to the relevant facilities, after a systematic assessment of the environmental risks, in accordance with the provisions of Article 20, paragraph 10, of Law No 4014/2011 ([190]).

([188]) In Article 24, paragraph 1, of the Greek constitution, protection of the environment is defined as an individual right of every citizen and as an obligation of the state.

([189]) The concept is explained in detail in the European Commission's 2018 communication on EU actions to improve environmental compliance and governance (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018DC0010) and the related Commission staff working document ().

([190]) The law is on environmental permits for projects and activities and other provisions within the competence of the Ministry of Environment and Energy.

In addition, with the recent change in legislation on environmental inspections (Article 20 of Law No 4014/2011), a ministerial decision on the compliance action model has been issued, in which environmental risk analysis is considered appropriate for the categorisation of non-conformities.

In addition to imposing fines, the inspectorate can set out a corrective action plan for the compliance of the inspected activities with current environmental legislation and the approved environmental conditions.

The inspectorate, in collaboration with the Waste Management Directorate, is in the process of creating a plan for cross-border inspections, as per Article 62 of Regulation (EU) 2024/1157.

It appears that the environmental compliance assurance system in Greece would benefit from a more active participation in the work of the European Union Network for the Implementation and Enforcement of Environmental Law. Providing a more detailed assessment of compliance assurance activities will be an aim for the next EIR.

In November 2023, a regional conference dedicated to strengthening the fight against crime affecting the environment was held, which representatives from Albania, Bosnia and Herzegovina, Bulgaria, Croatia, France, Greece, Kosovo, Montenegro, North Macedonia, Serbia, Slovakia, Slovenia, Poland and Romania attended ([191]).

The 2022 EIR recommended that Greece (i) improve the availability of practical information for farmers and land managers on how to contribute to better implementation of the Nature and Nitrates Directives; (ii) improve the information provided to citizens on opportunities to file complaints about environmental issues or infringements, and publish data on the follow-up of such complaints; (iii) improve the reporting of action taken against environmental crime; (iv) establish a database for ELD cases, and other instances of environmental damage, and publish information on such cases, including on sanctions and other financial measures. Sygapez, the national competent authority for the implementation of environmental liability, has developed a platform through the LIFE 'Promote financial instruments for liability on environment' (Profile) programme. ELD cases are registered on the platform by Sygapez and regional competent authorities for environmental liability. A training event on the use of platform was held. Some of the data registered will be available to the public.

Concerning compliance promotion, monitoring, and criminal and administrative enforcement, the other 2022 priority actions are not assessed here due to a lack of systematic information. Similarly, the Commission is not aware of whether information is easily available online at the national level for farmers regarding compliance with the Nitrates and Nature Directives, and hence the related 2022 priority action is not assessed.

The new EU Environmental Crime Directive

The EU has recently strengthened its legal framework on tackling the most serious breaches of environmental obligations, notably by the adoption of the new Environmental Crime Directive (ECD) (Directive (EU) 2024/1203) ([192]) and new sectoral legislation with stronger provisions on compliance monitoring, enforcement and penalties. Issues important for the transposition and the implementation of the relevant new instruments are highlighted below; a detailed assessment of these topics will be included in the next EIR once more implementation measures are put in place and more systematic information is available.

The new ECD replaced the 2008 ECD and introduced several new offence categories, such as unlawful ship recycling, unlawful water abstraction, and serious breaches of EU legislation on chemicals, mercury, fluorinated GHG and IAS of EU concern. It also covered the establishment of qualified offences, subject to more severe penalties where one of the offences defined in the directive leads to serious widespread and substantial damage or destruction of the environment. Concrete provisions on the types and levels of penalties for natural and legal persons who commit an offence were also introduced. Other provisions will help considerably to improve the effectiveness in combating environmental crime of all actors along the enforcement chain. These include obligations to ensure adequate resources and investigative tools, specialised regular training and the establishment of cooperation mechanisms within and between Member States as well as national strategies on combating environmental crime.

Member States are required to transpose the new ECD into national law by 21 May 2026 and to take additional measures to more effectively combat environmental crime, in particular through training, coordination, cooperation and strategic approaches. The Commission will provide support, including by facilitating the identification and sharing of good practices. Member States are expected to ensure the necessary resources and specialised skills required and they are invited to

([192]) Directive 2024/1203/EU on the protection of the environment through criminal law https://eur-lex.europa.eu/eli/dir/2024/1203/oj/eng

encourage their authorities to support and cooperate with the recognised EU-level networks of environmental enforcement practitioners, such as the EU Network for the Implementation and Enforcement of Environmental Law ([193]), EnviCrimeNet ([194]), the European Network of Prosecutors for the Environment ([195]) and the EU Forum of Judges for the Environment ([196]). The European Union Agency for Law Enforcement Cooperation and European Union Agency for Criminal Justice Cooperation mechanisms for cooperation on cross-border cases should be used more systematically for environmental offences.

Environmental Liability Directive

The Environmental Liability Directive (ELD) ([197]) aims to ensure that environmental damage is remediated in kind at the expense of those who have caused it, in line with the polluter-pays principle. It helps to halt the net loss in biodiversity, as well as reducing the number of contaminated sites and protecting the environmental quality of groundwater and surface waters. The ELD is a cross-cutting tool and a key enabler for better implementation of EU environmental law.

The ELD addresses cases of significant environmental damage to protected species and natural habitats, and, when caused by operators carrying out certain potentially hazardous activities, also damages to water and to soil. The Commission has the legal obligation to periodically evaluate the ELD. The ELD has undergone the second evaluation ([198]), which will be finalised in 2025, and which was supported by an external study ([199]), containing, among other things, evidence, views, reports and other relevant information gathered from different stakeholder groups, including Member States.

One of the most relevant indicators in assessing implementation and enforcement of the ELD is the number of environmental damage cases handled under the ELD, especially when this number is compared with the previous reporting period. Fewer ELD cases were reported in the second reporting period (2013–2022) than in the first one (2007–2013). However, the downward tendency in the number of ELD occurrences and their overall low number do not necessarily mean that the ELD has achieved its objectives, as it needs to be compared with the overall number of environmental damage cases, some of which may have been handled under the other liability instruments.

The ELD has not always been effective in ensuring that the polluter pays, because the liable operators often lack financial capacity to carry out remediation measures. While the ELD does not provide for a mandatory financial security system, it explicitly calls for Member States to encourage the development of financial security instruments and markets, with the aim of enabling operators to use financial guarantees to cover their responsibilities under this directive.

From 1 May 2013 to 31 December 2021, Greece reported 165 occurrences of environmental damage under the ELD, which was a considerable increase from the previous reporting period, when there were 11 confirmed occurrences of imminent threat and 40 environmental damage occurrences under the ELD. One reason for the relatively high number of ELD occurrences in Greece is that Greece does not have specific national legislation for preventing and remediating environmental damage other than national legislation implementing the ELD. There are thus no overlaps or gaps between national ELD legislation and other national environmental legislation. Moreover, Greece is among the Member States that have most heavily invested in developing training and methodologies assisting ELD implementation ([200]).

The environmental insurance market in Greece is in a relatively early stage of development except for insurance that provides cover for businesses involved in hazardous and non-hazardous waste management, which are subject to mandatory financial security in the form of insurance policies or, occasionally, bank guarantees. Greece has proposed, but has not yet brought into force, mandatory financial security for ELD liabilities. In general, environmental insurance policies for on-site and off-site ELD liabilities are available from a limited number of insurance companies; however, demand for them is very low. Nevertheless, demand for financial security has increased since 2020 with the introduction of Law No 4685/2020, which imposed mandatory financial security on non-hazardous waste management. Environmental extensions to general liability policies are

([193]) https://www.impel.eu/en.
([194]) LIFE+SATEC project (https://webgate.ec.europa.eu/life/publicWebsite/project/LIFE20-PRE-ES-000001/fight-against-environmental-crime-at-a-strategic-level-through-the-strengthening-of-envicrimenet-network-of-experts-in-environmental-criminal-investigations).
([195]) https://www.environmentalprosecutors.eu.
([196]) https://www.eufje.org/index.php?lang=en.
([197]) Directive 2004/35/EC on environmental liability with regard to the prevention and remedying of environmental damage, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02004L0035-20190626.
([198]) Commission staff working document - Evaluation of the Environmental Liability Directive, forthcoming 2025.
([199]) European Commission: Directorate-General for Environment and Fogleman, V., *Study in support of the evaluation of the Environmental Liability Directive and its implementation – Final report*, Publications Office of the European Union, Luxembourg, 2024, https://op.europa.eu/en/publication-detail/-/publication/006d90e5-980a-11ef-a130-01aa75ed71a1/language-en.
([200]) An example is the EU-funded programme LIFE Profile (LIFE19 GIE/GR/001127) (https://life-profile.gr/en/).

not generally available and demand for them is low as well.

In relation to the ELD, the 2022 EIR recommended that Greece establish a database for ELD cases, and other instances of environmental damage, and publish information on such cases, including on sanctions and other financial measures. According to the latest information, a platform on ELD cases has been established. It will soon be available to the public. There is no further information available on the progress regarding the 2022 priority actions in relation to the ELD. Therefore, efforts to implement them should continue along with efforts to implement the 2025 priority action.

2025 priority action

- Encourage the use of training programmes provided by the Commission (or developed at the national level) covering the ELD and its interactions with the other national liability-related instruments, to ensure more efficient ELD implementation, improve the expertise of the competent authorities and raise awareness among all stakeholder groups.

EU-supported environmental capacity building

The Commission's 2023 Compact ([201]) initiative to enhance the administrative space identifies the capacity to lead the green transition as one of three key pillars, along with the public administration skills agenda and the capacity for Europe's Digital Decade. Compact also recognises the role of the EIR reporting tool in improving environmental governance. The two main capacity-building opportunities for the environment provided by the European Commission are the TSI ([202]) and the TAIEX-EIR PEER 2 PEER tool ([203]). The technical assistance available through the cohesion policy is subject to shared management and is not dealt with in this subsection.

The Commission's technical support instrument

The TSI provides Member States with tailor-made technical expertise on the design and implementation of reforms. The support is demand driven and does not require national co-financing.

The TSI had annual calls in 2021, 2022, 2023,2024 and 2025. The following environment-related projects have been selected for Greece:

- Post-fire biodiversity and biotic natural capital recovery: Framework development in the case of Evia, Ministry of Environment and Energy, Natural Environment & Climate Change Agency (2021);
- Greening taxes – Applying the polluter pays principle in practice, Ministry of Finance (2022);
- Bridging the climate financing gap with public policy instruments, Ministry of Finance, Ministry of Development and Investments and the Ministry of Environment and Energy (2022)
- ESG ([204]) risk management framework for the financial sector, Capital Market Commission (2023);
- Enhancing the centre of government's capacities to steer complex priorities and manage crisis and megatrends through peer to peer review and learning, General Secretariat of Coordination (2024);
- Technical support for the development of a Social Climate Plan and the implementation of the EU Emission Trading Systems as well as the Carbon Border Adjustment Mechanism in Greece (CLIMA+), Ministry of Environment and Energy (2024);
- Strengthening Greece's resilience, preparedness, and crisis response capacity, Ministry for Climate Crisis and Civil Protection (2024);
- Strengthening the green budgeting reform in Greece, Ministry of National Economy and Finance (2024).

The Commission's TAIEX-EIR PEER 2 PEER tool

The Commission launched the TAIEX-EIR PEER 2 PEER tool in 2017. It aims to facilitate peer-to-peer learning among Member States' environmental authorities through workshops (single or multi-country), expert missions (where a delegation of experts travels to the requesting institution) and study visits (where a delegation from the requesting institution travels to a host country). Flagship multi-cultural workshops are those requested by the European Commission to present new and upcoming environmental legislation and policy in all Member States ([205]).

([201]) See the European Commission web page on Compact (https://reform-support.ec.europa.eu/public-administration-and-governance-coordination/enhancing-european-administrative-space-compact_en).

([202]) See the European Commission web page on the TSI (https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/technical-support-instrument/technical-support-instrument-tsi_en).

([203]) See the European Commission web page on the TAIEX-EIR PEER 2 PEER tool (https://environment.ec.europa.eu/law-and-governance/environmental-implementation-review/peer-2-peer_en). TAIEX: Technical Assistance and Information Exchange.

([204]) 'ESG' here means 'environmental, social and governance'.

([205]) Flagship multi-country workshops in the reporting period are: Recast Drinking Water Directive (3 April 2025); Environmental compliance and governance (18 March 2025); Planning of Renewable Energy Projects (20 February 2025); Air Quality: Implementation of the revised Air Quality Directive (16 January 2025); Industrial safety: awareness raising of emerging risks linked with climate change and decarbonation (12 December 2024); Air quality: implementation of the NEC Directive to further mainstream air and broader pollution reduction in agricultural policy (25 September 2024); Industrial emissions transposition

Workshops involving Greece are as follows:

- Future challenges for air protection (24 November 2022) with the Czech EU presidency;
- Best practices in applying Article 6(3) of Habitats Directive: Practical solutions to carry out Natura impact assessments effectively (25–27 October 2023);
- Green budgeting at regional level (9 April 2024);
- New aspects in the cross-border cooperation against environmental crime (Hungary, 19–20 November 2024);
- Online platforms: EU Batteries, Packaging and Packaging Waste Regulation (28–29 October 2024).

Greece hosted one expert mission on the proper implementation of the Nature Directives and the BDS (24–27 September 2024), and benefited from one study visit to Ireland (27–29 March 2023) on the implementation of Article 6(3) and 6(4) of the Nature Directives (92/43/EC).

2025 priority action

- Improve overall national environmental governance, in particular administrative capacity to support the green transition and coordination at the regional and local levels.

and implementation of the revised directive (12 September 2024); Noise: progress towards meeting Member States' noise limit values and EU reduction targets (5 June 2024); Best practice use of environmental footprint methods on the EU market (30 May 2024); Sustainable finance (9 November 2023); Textile waste separate collection, treatment and markets (3 October 2023); EU environmental funding and support (13 June 2023); Advisory service for businesses to go circular (24 April 2023); Digital product passport implementation (6 December 2022); Public involvement in planning and approval of renewable energy projects (17 November 2022); Environmental compliance and governance (14 November 2022); Biowaste management (19–20 September 2022); and Renewable energy projects: permit granting processes (13 June 2022). NB: The first flagship workshop on zero pollution for air, water and soil took place 9 February 2022.

Annex

2025 priority actions

Circular economy and waste management
Transitioning to a circular economy
• Adopt measures to increase the circular material use rate.
Waste management
• Implement, harmonise, and gradually increase landfill taxes to phase out landfilling of recyclable and recoverable waste. • Complete closure of non-compliant landfills. • Improve separate collection at source e.g. through economic instruments, investing in infrastructure for separate collection, sorting and recycling, and increasing public awareness. • Increase reuse of products and scale up waste recycling infrastructure associated with the higher steps of the waste hierarchy. In particular, improve collection and increase treatment capacity for bio-waste. • Improve municipal waste preparation for reuse and recycling. • Increase the recycling rates of packaging waste. • Increase the collection and recycling rate of waste electronic and electric equipment (WEEE). • Improve the system for managing the quality of data on packaging waste in order to build coherent and verifiable data sets. • Invest in waste prevention measures to reduce the total amount of waste generated. • Ensure the achievement of the 2025 waste targets, following the recommendations made by the Commission in the Early Warning Reports where applicable.
Biodiversity and natural capital
Global and EU biodiversity frameworks
• Submit to the CBD an updated NBSAP or national targets following the adoption of the Kunming-Montreal Global Biodiversity Framework.
Nature protection and restoration – Natura 2000
• Complete the Natura 2000 site designation process. • Finalise the establishment of site-specific conservation objectives and measures for all Natura 2000 sites (including by adopting their management plans) and ensure their effective implementation. • Ensure the effective implementation of Natura 2000 management plans and sufficient administrative capacity and financing both for Natura 2000 and the implementation of the Nature Restoration Regulation. Ensure implementation of Prioritised Actions Framework 2021-2027 (PAFs).
Recovery of species
• Enhance efforts to collect reliable data on the conservation status of habitats and species as well as their occurrence at site level. In view of this, consider the creation of a body in charge of monitoring and reporting, to ensure that data are not provided only ad hoc on a contract basis.
Recovery of ecosystems
• Implement eco-schemes and agri-environmental measures and practices to address the environmental needs of Greece. • Designate the competent authority responsible for fulfilling the obligations arising from the EUDR and inform the Commission of the names, addresses, and contact details of said competent authority.

- Report its updates on the assessment of the state of its marine waters, its targets, and its determinations of GES which are expected to include any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level.

Prevention and management of invasive alien species

- Step up implementation of the IAS Regulation, including with regard to enforcement and capacity of inspection authorities.

Zero pollution

Clean air

- As part of the NAPCP, take action towards reducing emissions of air pollutants.
- Ensure full compliance with the current AAQD standards, also in light of future stricter requirements under the revised AAQD.
- Accelerate the ratification of relevant international conventions and protocols.

Industrial emissions

- Reduce industrial air pollution damage and intensity.
- Reduce industrial releases to water, and their intensity.
- Engage with industry and environmental NGOs to ensure proper contribution to and implementation of BAT conclusions; and ensure timely update of permits following publication of BAT conclusions.
- Ensure effective public participation and access to justice in relation with the IED.

Major industrial accidents prevention – Seveso

- Strengthen compliance with requirements on safety measures to prevent major accidents and ensure appropriate preparedness and response for UTEs, in particular as regards review, testing and update of EEPs; at intervals of no longer than 3 years.
- Ensure access to transparent and clear information towards citizens on risks and behaviour in case of accidents.
- Ensure full and correct transposition of the Seveso III Directive.
- Improve reporting on implementation of Seveso III Directive.

Noise

- Complete noise mapping.
- Complete and implement action plans on noise management.

Water quality and management

- Tackle nutrients pollution, especially nitrates from agriculture through the implementation of the Nitrates Directive.
- Take the necessary measures to ensure full implementation of the current urban wastewater treatment directive, taking into account the new requirements of the recast directive.

Chemicals

- Upgrade the administrative capacities in implementation and enforcement towards a policy of zero tolerance for non-compliance.
- Increase involvement in the activities of the Forum for Exchange of Information on Enforcement of the European Chemicals Agency, including in the coordinated enforcement projects, called REFs.
- Increase customs controls and controls of products sold online with regard to compliance with chemicals legislations.

Climate action

- Implement all polices and measures that are needed to achieve targets laid down in the Effort Sharing Regulation (ESR) and the Land Use and Land-Use Change and Forestry (LULUCF) Regulation. More detailed priority actions are set out in the assessment of the final National Energy and Climate Plan (NECP).

Financing
• Use more national funding (including by increasing taxes in favour of the environment and reducing environmentally harmful subsidies), EU funding and private funding to help close the investment gap.
Environmental governance
Information, public participation and access to justice
• Make spatial data more widely accessible and prioritise environmental datasets in implementing the Inspire Directive, especially those identified as high-value spatial datasets for implementing environmental legislation. • Ensure that relevant information on EIA and SEA procedures (including on public participation opportunities and on publication of final decisions) is electronically accessible in a timely manner, through at least a central portal or easily accessible points of access, at the appropriate administrative level. • Ratify the amendment to the UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters.
Compliance assurance
• Encourage the use of training programmes provided by the Commission (or developed at the national level) covering the ELD and its interactions with the other national liability related instruments, to ensure more efficient ELD implementation, improve the expertise of the competent authorities and raise awareness among all stakeholder groups.
EU-supported environmental capacity building
• Improve overall national environmental governance, in particular administrative capacity to support the green transition and coordination at the regional and local levels.