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COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
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To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union
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Delegations will find attached document COM(2025) 730 final.

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Proposal for a

COUNCIL IMPLEMENTING DECISION

amending the Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece

{SWD(2025) 379 final}

2025/0377 (NLE)

Proposal for a

COUNCIL IMPLEMENTING DECISION

amending the Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility[1], and in particular Article 20(1) thereof,

Having regard to the proposal from the European Commission,

Whereas:

(1) Following the submission of the national recovery and resilience plan ('RRP') by Greece on 27 April 2021, the Commission proposed its positive assessment to the Council. On 13 July 2021, the Council approved the positive assessment by means of an implementing decision ('the Council Implementing Decision of 13 July 2021')[2]. The council Implementing Decision of 13 July 2021 was amended by Council Implementing Decisions of 8 December 2023[3], 16 July 2024[4], 21 January 2025[5] and 18 July 2025[6].

(2) On 3 November 2025, Greece made a reasoned request to the Commission to make a proposal to amend the Council Implementing Decision of 13 July 2021 in accordance with Article 21(1) of Regulation (EU) 2021/241 on the grounds that the RRP is partially no longer achievable because of objective circumstances. On that basis, Greece has submitted an amended RRP.

Amendments based on Article 21 of Regulation (EU) 2021/241

(3) The amendments to the RRP submitted by Greece because of objective circumstances concern 153 measures.

(4) Greece has explained that eight measures are no longer achievable due to unexpected delays related to public procurement procedures. This concerns measure 16285 – Investments in the national irrigation network through PPP schemes, measure 16851 –

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1 OJ L 57, 18.2.2021, p. 17, ELI: https://eur-lex.europa.eu/eli/reg/2021/241/oj
2 ST 10152/21 INIT; ST 10152/21 ADD 1.
3 ST 15831/23 REV1; ST 15831/23 ADD 1 REV 1.
4 ST 11858/24 INIT; ST 151858/24 COR 1; ST 151858/24 ADD 1; ST 151858/24 ADD COR 1.
5 ST 17055/24 INIT; ST 17055/24 ADD 1; ST 17055/24 ADD 1 COR 1.
6 ST 11101/25 INIT; ST 11101/25 ADD1

Biodiversity protection as a driver for sustainable growth, measure 16823 – Cybersecurity strategy and policies for the Public Sector & advanced security services for national critical infrastructures, measure 16827 – Data Governance strategy & policies for the Public Sector, measure 16934 – Upgrading Vocational Education and Training, measure 16757 – Establishment of a Radiotherapy Center at the "Sotiria" Thoracic Diseases Hospital of Athens, measure 16925 - Digital Transformation of the social support system. On this basis, Greece has requested that those measures be amended. Furthermore, Greece has requested to remove measure 16621 – Extroversion of the Research and Innovation Ecosystem of Greece. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

(5) Greece has explained that nine measures are no longer achievable because of lower than expected demand. This concerns measure 16874 – Energy and entrepreneurship, measure 16706 – Digital Transformation of SMEs, measure 16922 – Social Integration, measure 16711 – Professionalization of Public Procurement domain, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption, measure 16584 – Proposals for actions in the Aquaculture Sector, measure 16626 – Economic transformation on the Agricultural Sector, measure 16634 – New Industrial Parks, measure 16931 – Tourism Development, measure 16593 – Amendment of the legal framework for the attraction of strategic investment. On this basis, Greece has requested that those measures be amended. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

(6) Greece has explained that one measure is no longer achievable due to supply chain disruptions. This concerns, measure 16996 - Installation of energy storage for additional RES penetration**.** On this basis, Greece has requested that this measure be removed. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

(7) Greece has explained that five measures are no longer achievable due to unforeseen legal issues, including court litigations. This concerns measure 16291 – Digital transformation of the Tax and Customs Administration measure 16911 - Aerial means for crisis management, measure 16794 - Strengthening the Apprenticeship System, vocational education and training, and skills, measure 16630 - Cretan Northern Highway (B.O.A.K.). On this basis, Greece has requested that those measures be amended. Furthermore, Greece has requested to remove measure 16785 - Tourism Registry e-MHTE. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

(8) Greece has explained that four measures are no longer achievable due to unexpected technical challenges. This concerns measure 16778 - Digitisation of archives and related services, measure 16793 - Project for the construction of a building dedicated to Cellular & Gene Therapies and Hematology Clinic Laboratories within the General Hospital of Thessaloniki "Papanikolaou", measure 16904 - Disability, measure 16919 – Child protection. On this basis, Greece has requested that those measures be amended. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

(9) Greece has explained that 16 measures have been amended to implement better alternatives in order to achieve their original ambition. This concerns measure 16872 – Energy renovation on residential buildings, measure 16873 – Interventions in residential areas and in the building stock, measure 16401 - Energy Upgrade

Programme “Upgrade My Home”, measure 16831 – Produc- E Green, measure 16924 – Electromobility, measure 16779 – Interoperability and web services development, measure 16964 – Next-Generation Interoperability Centre (KED), measure 16795 – Health infrastructure, measure 16755 – Reform of the Primary Health Care System, measure 16982 - Organisational reform in the railways sector, measure 16999 – Accessibility Restoration following the devastating effects of storms “DANIEL” and “ELIAS”, measure 16735 - Utilizing “arts on prescription”, promoting social cohesion, and tapping on the silver economy, measure 16989 – Optimisation of land and sea space usage for the development of RES and offshore wind energy development, measure 16980 – RRP Loan Facility, measure 16993 – Roadmap for innovative energy efficiency interventions and identification of new financial instrument, measure 16995 – Renewable Hydrogen production project. On this basis, Greece has requested to amend the aforementioned measures. As those circumstances justify an amendment of the measures, the Council Implementing Decision of 13 July 2021 should be amended accordingly.

(10) Greece has explained that 92 measures have been amended to implement better alternatives that allow the administrative burden to be reduced and simplify the Council Implementing Decision, while still achieving the objectives of those measures. This concerns measure 16870 - Interventions for the electricity interconnection of islands and the upgrading of the electricity network, measure 16871 Interventions for the electricity interconnection of islands and the upgrading of the electricity network, measure 16899 - Installed capacity increase in Hellenic Electricity Distribution Network Operator (HEDNO) HV/MV substations for new RES connection, measure 16900 - HEDNO overhead network upgrading in forest areas, measure 16901 - HEDNO network upgrades aiming at enhancing resilience and protecting the environment, measure 16926 – Support of the installation of storage systems to enhance RES penetration, measure 16875 - Infrastructure development and buildings’ restoration in former royal estate in Tatoi, measure 16932 - Olympic Athletic Center of Athens, measure 16894 - Establishment of new special spatial planning framework for renewable energy, industry, and tourism, measure 16850 - Drinking Water Supply and Saving Infrastructures, measure 16909 - Establishment of a strategic National Disaster Risk Management, measure 16910 - Monitoring and Management System, measure 16912 - Forest firefighting, prevention and response equipment, measure 16983 - Preliminary inspection of seismic resistance of buildings, measure 16772 - Waste management law for sustainable landfilling and recycling, measure 16855 – Small-satellites, measure 16844 - Transition to 5G technology, facilitating the development of innovative remote services, measure 16736 - New system for Public Procurements, measure 16791 - Digital Transformation of the Greek National Tourism Organisation, measure 16810 - CRM for the General Government, measure 16742 - Digital transformation of the Ministry of Foreign Affairs, measure 16782 - Interconnection and interoperability of registries, systems and services for data exchange between national public organisations, measure 16824 – E-Registries, measure 16928 - Incorporation of new technologies and trends towards Public Administration’s advanced services, increase of efficiency and effectiveness, and decrease of systems operating, upgrade and maintenance costs, measure 16854 - Smart cities, measure 16955 - Upgrade of Cloud-computing infrastructure and services of the National Infrastructures for Research and Technology (GRNET), measure 16842 - Central BI - Data Analytics, measure 16956 - Expansion of Syzefksis II, measure 16973 - Establishment of a digital business ecosystem for the facilitation of the SMEs digital transformation, measure 16744 - Modernisation and Simplification of Labour

Law, measure 16746 - Reform of Passive Labour Market Policies to Support Transitions to Employment, measure, measure 16747 - Active Labour Market Policies Reform, 16750 - Digital Transformation of Labour Systems, measure 16941 - Restructuring and rebranding of DYPA's local branches for the promotion of employment (KPA2), measure 16942 - Digital transformation of the public employment service (DYPA), measure 16289 - Strategy for Excellence in Universities & Innovation, measure 16792 - Labor force skilling, reskilling and upskilling through a reformed training model (Vocational Education & Training Reform), measure 16913 - A New Strategy for Lifelong Skilling: Modernising and Upgrading Greece's Upskilling and Reskilling System, measure 16676 – Digital transformation of Education, measure 16933 – Upgrading Vocational Education and Training, measure 16816 – Clawback reduction and rationalization of healthcare expenditure, measure 16753 - Establishment of Home Health Care & Hospital at Home systems, measure 16984 - Personal doctor reform, measure 16726 - Social Benefits Optimisation, measure 16685 - Diversity Awareness, measure 16402 - Social and Affordable Housing, measure 16688 – Promote integration of the refugee population, measure 16763 – Digital transformation of the immigration and asylum system, measure 16611 - Digital transformation of tax audits, measure 16643 - Codification and simplification of tax legislation, measure 16952 - Strengthening the national anti-corruption framework, measure 16701 - Enhance State-aid network, measure 16703 - Combating illegal trade and protecting intellectual property, measure 16972 - Reforming Public Administration, measure 16974 - Accounting Reform, measure 16705 - Transformation of Fiscal Management and Supervision in Governance, measure 16940 - Modernise the Hellenic Consignment Deposit and Loans Fund, measure 16986 - Completion of the national cadastre, measure 16292 - New Judicial buildings and renovations, measure 16727 - Digital Transformation of Justice (E-Justice), measure 16575 - Accelerating the administration of justice, measure 16733 - Skills and digital skills for judges and judicial employees (judicial staff), measure 16581 - Enhanced capital market supervision and trustworthiness, measure 16957 - Strengthening the capacity of the financial system to overcome legacy challenges and finance the real economy, measure 16580 - Upgrade of the digital infrastructure necessary for the implementation of the new unified insolvency framework for the restructuring of debt and second chance, measure 16618 - Basic & Applied Research, measure 16624 - Creation-Expansion–Upgrade of Infrastructures of Research Centers supervised by the General Secretariat for Research and Innovation (GSRI), measure 16654 - TH^{2}ORAX: Trellis Holistic & Hybrid Operational Ruggedized Autonomous eXemplary system, measure 16971 - Research - Create – Innovate, measure 16622 - HORIZON 2020 "Seal of Excellence": financing top innovative companies, measure 16628 - Central Greece Highway E-65: Trikala- Egnatia Section, measure 16892 - Upgrading suburban railway of West Attica, measure 16833 - Implementation of airport safety works, measure 16949 – Smart Bridges, measure 16959 - Digital Transformation of the Hellenic Railways, measure 16786 - Simplification of the Procedures of the Ministry of Infrastructure & Transport, measure 16293 - Culture as a driver of growth, measure 16433 - Protection of cultural monuments and archaeological sites from climate change, measure 16715 - Labor Reform in the Cultural Sector, measure 16721 - Acceleration of smart manufacturing, measure 16725 - Upgrading higher arts education, measure 16485 - Cultural Routes at Emblematic Archaeological Sites and Monuments, measure 16435 - Restoration – Conservation – Enhancement of the Acropolis Monuments, measure 16921 - Reskilling and Upskilling in Tourism, measure 16937 - Digital Integrated Program Management System for the Administration of the Technical Works and Structural Assets of the

Ministry of Infrastructure and Transport, measure 16975 - Upgrade Interventions for Regional Ports, measure 16944 - Master plan for the renewal of the Greek passenger shipping fleet, measure 16543 - Actions for the simplification of the business environment and its upgrading in quality and safety, measure 16988 - Regulatory and market operation framework for carbon capture, usage, and storage technologies to foster industry decarbonization, measure 16990 - Grid and storage capacity – fostering of storage investments, measure 16991 - Regulatory framework towards a smart grid, measure 16992 - Toolset to promote energy sharing, self-consumption and renewable Energy Communities. On this basis, Greece has requested that those measures be amended. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

(11) Following the removal and the decrease in the level of implementation of measures in accordance with Article 21 of Regulation (EU) 2021/241, Greece has requested that the level of implementation of 15 measures be increased (16879 - Preparation of Urban Plans in implementation of the urban policy reform, measure 16846 - Urban Wastewater and Sludge Management Infrastructures from Wastewater Treatment, measure 16849 - National Reforestation Plan and Parnitha flagship investment, measure 16818 - Fiber optic infrastructure in buildings, measure 16780 - Further Modernisation of Public Administration's One-Stop Shops, measure 16929 - Towards Public Administration's "customer"-oriented services through simplification and improvement of processes, systems enhancements and compliance with European strategies and policies, measure 16756 – Organizational Reforms in the Health System, measure 16752 - Digital Transformation of Health (DigHealth), measure 16783 - Implementation of the National Public Health Prevention Program "Spiros Doxiadis" (NPP"SD"), measure 16486 - Museum of underwater antiquities, measure 16631 - Road Safety Upgrade, measure 16653 - Digital Transformation of the Agri-Food Sector, measure 16536 - Upgrade of infrastructure, renewal of equipment and upgrade of quality of services provided by HOCRED Stores – former ARF Stores (On-spot and electronic, measure 16994 – Energy Efficiency and promotion of RES for auto-consumption), measure 16960 - Smart Infrastructure with environmental and cultural focus) and that three new measures be added (16403 - Repayable Capital Injection into the Hellenic Development Bank, measure 16405 - Pillar assessment of the Hellenic Development Bank, measure 16404 - Development Program for Local Government "Antonis Tritsis"). The Council Implementing Decision of 13 July 2021 should be amended accordingly.

Distribution of milestones and targets

(12) The distribution of milestones and targets in instalments should be amended to take into account the amendments to the RRP and the indicative timeline presented by Greece.

Commission's assessment

(13) The Commission has assessed the amended RRP against the assessment criteria laid down in Article 19(3) of Regulation (EU) 2021/241.

Do no significant harm

(14) In accordance with Article 19(3), point (d), of and Annex V, criterion 2.4, to Regulation (EU) 2021/241, the amended RRP is expected to ensure that no measure (rating A) for the implementation of reforms and investments projects included in the RRP does significant harm to environmental objectives within the meaning of Article

17 of Regulation (EU) 2020/852 of the European Parliament and of the Council[7] (the principle of 'do no significant harm').

(15) The amended RRP assesses compliance with the 'do no significant harm' principle following the methodology set out in the technical guidance provided in the Commission Notice 'Technical guidance on the application of "do no significant harm" under the Recovery and Resilience Facility Regulation'. The assessment is done systematically for each modified reform and investment following the two-step approach. The assessment concludes that for all modified measures, there is no risk of significant harm. Where needed, the requirements of the 'do no significant harm' assessment are enshrined in the design of a measure and specified in a milestone or target of this measure. Based on the information provided, it can be concluded that no measure does significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852.

Contribution to the green transition including biodiversity

(16) In accordance with Article 19(3), point (e), of and Annex V, criterion 2.5, to Regulation (EU) 2021/241, the amended RRP contains measures that contribute to a large extent (rating A) to the green transition, including biodiversity, or to addressing the challenges resulting therefrom. The measures supporting climate objectives account for an amount which represents 37,6% of the amended RRP's total allocation and 98,7% of the total estimated costs of measures in the REPowerEU chapter calculated in accordance with the methodology set out in Annex VI to Regulation (EU) 2021/241. In accordance with Article 17 of Regulation (EU) 2021/241, the amended RRP is consistent with the information included in the National Energy and Climate Plan 2021-2030.

(17) The amended RRP maintains measures supporting the green transition that contribute to achieving the 2030-2050 targets and the objective of Union's climate neutrality by 2050, as well as to fostering biodiversity. For instance, under measure 16994 it is expected that 161 455 solar water heaters and 36 600 heat pumps will be acquired by households, including specific targets set for vulnerable households.

Contribution to the digital transition

(18) In accordance with Article 19(3), point (f), of and Annex V, criterion 2.6, to Regulation (EU) 2021/241, the amended RRP contains measures that contribute to a large extent (rating A) to the digital transition or to addressing the challenges resulting from it. The measures supporting digital objectives account for an amount which represents 22,3% of the amended RRP's total allocation calculated in accordance with the methodology set out in Annex VII to that Regulation.

(19) The measures in the amended RRP continue contributing to the digital transition or helping to address the related challenges and positively address Greece's shortcomings in the digital field as identified in the second State of the Digital Decade report 2025. The amended RRP continues to significantly address the digital transition challenges faced by Greece in the areas of connectivity, digital public services, human capital and digital skills, the digitalisation of businesses and the adoption of advanced digital technology.

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[7] Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (OJ L 198, 22.6.2020, p. 13, ELI: https://eur-lex.europa.eu/eli/reg/2020/852/oj/eng).

Costing

(20) In accordance with Article 19(3), point (i), of and Annex V, criterion 2.9, to Regulation (EU) 2021/241, the justification provided in the amended RRP on the amount of the estimated total cost of the RRP is to a medium extent (rating B) reasonable and plausible, is in line with the principle of cost efficiency and is commensurate to the expected national economic and social impact.

(21) Greece provided sufficient information and evidence that estimated costs were not covered by existing or planned Union financing. However, in a limited number of cases, cost estimates could not be sufficiently substantiated. Overall, this warrants a rating of B under the assessment criterion of Article 19(3), point (i), of Regulation (EU) 2021/241. Finally, the amount of the estimated total costs of the RRP is in line with the principle of cost efficiency and commensurate to the expected national economic and social impact.

(22) The Commission considers that the amendments put forward by Greece do not affect the positive assessment of the RRP set out in the Council Implementing Decision ST 10152/21 INIT; ST 10152/21 ADD 1 of 13 July 2021 on the approval of the assessment of the RRP for Greece regarding the relevance, effectiveness, efficiency and coherence of the RRP against the assessment criteria laid down in Article 19(3), points (a), (b), (c), (da), (db), (g), (h), (j) and (k).

Measures supporting investment operations contributing to the objectives of the Strategic Technologies for Europe Platform (STEP)

(23) In accordance with Article 4(4) of the Regulation (EU) 2024/795 of the European Parliament and of the Council of 29 February 2024 establishing the Strategic Technologies for Europe Platform (STEP)[8], Greece considered as a matter of priority projects that have been awarded a Sovereignty Seal pursuant to Article 4(1) of the Regulation (EU) 2024/795. However, Greece considered that no project having been awarded a Sovereignty Seal was to be included in the amended RRP because their timeline goes beyond 2026.

Positive assessment

(24) Following the positive assessment by the Commission of the amended RRP, with the finding that the RRP satisfactorily complies with the criteria for assessment set out in Regulation (EU) 2021/241, in accordance with Article 20(2) of and Annex V to that Regulation, the reforms and investment projects necessary for the implementation of the amended RRP, the relevant milestones, targets and indicators, and the amount made available from the Union for the implementation of the amended RRP should be set out.

Financial contribution

(25) The estimated total costs of Greece's amended RRP is EUR 36 189 617 035. As the amount of the estimated total cost of the amended RRP is higher than the updated maximum financial contribution available for Greece, the financial contribution

[8] Regulation (EU) 2024/795 of the European Parliament and of the Council of 29 February 2024 establishing the Strategic Technologies for Europe Platform (STEP), and amending Directive 2003/87/EC and Regulations (EU) 2021/1058, (EU) 2021/1056, (EU) 2021/1057, (EU) No 1303/2013, (EU) No 223/2014, (EU) 2021/1060, (EU) 2021/523, (EU) 2021/695, (EU) 2021/697 and (EU) 2021/241 (OJ L, 2024/795, 29.2.2024, ELI: http://data.europa.eu/eli/reg/2024/795/oj (BG, ES, CS, DA, DE, ET, EL, EN, FR, GA, HR, IT, LV, LT, HU, MT, NL, PL, PT, RO, SK, SL, FI, SV)

determined in accordance with Article 4a of Regulation (EU) 2021/1755 of the European Parliament and of the Council[9], and with Article 20(4) and Article 21a(6) of Regulation (EU) 2021/241 that is allocated for Greece's amended RRP should be equal to EUR 18 220 378 076. Therefore, the financial contribution made available to Greece remains unchanged.

Loans

(26) The loan support made available to Greece amounting to EUR 17 727 538 920 remains unchanged.

(27) The Council Implementing Decision ST 10152/21 INIT; ST 10152/21 ADD 1 of 13 July 2021 on the approval of the assessment of the RRP for Greece should therefore be amended accordingly. For the sake of clarity, the Annex to the Council Implementing Decision of 13 July 2021 should be replaced entirely.

(28) This Decision should be without prejudice to the outcome of any procedures relating to the award of Union funds under any Union programme other than the Facility or to procedures relating to distortions of the operation of the internal market that may be undertaken, in particular under Articles 107 and 108 of the Treaty. It does not override the requirement for Member States to notify instances of potential State aid to the Commission under Article 108 of the Treaty,

HAS ADOPTED THIS DECISION:

Article 1
Approval of the assessment of the RRP

The assessment of the amended RRP of Greece on the basis of the criteria provided for in Article 19(3) of Regulation (EU) 2021/241 is approved.

Article 2
Amendments

The Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece is amended as follows:

the Annex to the Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece is replaced by the text set out in the Annex to this Decision.

[9] Regulation (EU) 2021/1755 of the European Parliament and of the Council of 6 October 2021 establishing the Brexit Adjustment Reserve (OJ L 357, 8.10.2021, p. 1, ELI: http://data.europa.eu/eli/reg/2021/1755/oj).

Article 3
Addressee

This Decision is addressed to the Hellenic Republic.

Done at Brussels,

For the Council
The President