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2023/0429 (NLE)

Proposal for a

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amending Implementing Decision (EU) (ST 10152/21; ST10152/2021 ADD1) of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece

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2023/0429 (NLE)

Proposal for a

COUNCIL IMPLEMENTING DECISION

amending Implementing Decision (EU) (ST 10152/21; ST10152/2021 ADD1) 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 has proposed its positive assessment to the Council. The Council approved the positive assessment by means of the Council Implementing Decision of 13 July 2021[2].

(2) Pursuant to Article 11(2) of Regulation (EU) 2021/241, the maximum financial contribution for non-repayable financial support of each Member State should be updated by 30 June 2022 in accordance with the methodology provided therein. On 30 June 2022, the Commission presented the results of that update to the European Parliament and the Council.

(3) On 31 August 2023, Greece submitted a modified national RRP, including a REPowerEU chapter in accordance with Article 21c of Regulation (EU) 2021/241, to the Commission.

(4) The modified RRP also takes into account the updated maximum financial contribution in accordance with Article 18(2) of Regulation (EU) 2021/241 and includes a reasoned request to the Commission to propose to amend the Council Implementing Decision in accordance with Article 21(1) of Regulation (EU) 2021/241 considering the RRP to be partially no longer achievable due to objective circumstances. The modifications to the RRP submitted by Greece concern 69 measures.

(5) On 14 July 2023, the Council addressed recommendations to Greece in the context of the European Semester. In particular, the Council recommended that Greece continue building on reforms undertaken as part of the recovery and resilience plan, including

[1] OJ L 57, 18.2.2021, p. 17.

[2] ST 10152 2021; ST 10152 2021ADD 1.

to improve the investment friendliness of the taxation system, enlarge the tax base, strengthen tax compliance and preserve the operational autonomy of the tax authority. Additionally, the Council called on Greece to safeguard the efficiency of public administration, pursue the ongoing reduction of non-performing loans, ensure adequate and equal access to healthcare and finalise the cadastre reform. The Council also recommended that Greece reduce its reliance on fossil fuels and further accelerate the diversification of energy supply routes, expand the deployment of renewable energy, increase electricity network and storage capacity, step up the delivery of measures that improve energy efficiency, including targeted measures for energy-poor households, support the decarbonisation of the transport sector, in particular by promoting electric vehicles, and step up policy efforts aimed at the provision and acquisition of skills and competences needed for the green transition.

(6) The submission of the modified RRP followed a consultation process, conducted in accordance with the national legal framework, involving local and regional authorities, social partners, civil society organisations, youth organisations and other relevant stakeholders. The summary of the consultations was submitted together with the modified national RRP. Pursuant to Article 19 of Regulation (EU) 2021/241, the Commission assessed the relevance, effectiveness, efficiency and coherence of the modified RRP, in accordance with the assessment guidelines set out in Annex V to that Regulation.

Loan request based on Article 14(2) of Regulation 2021/241

(7) The modified RRP submitted by Greece includes a request for loans in support of the financial institutions' distribution channel of measure 16980 (RRP Loan Facility). This concerns the introduction of two new targets (325a and 326a) and one new milestone (328a), and the modification of targets 326, 327 and 328.

Updates based on Article 18(2) of Regulation 2021/241

(8) The modified RRP submitted by Greece updates nine measures to take into account the updated maximum financial contribution. Greece has explained that because the maximum financial contribution decreased from EUR 17 769 942 602[3] to EUR 17 426 708 153[4], it was no longer possible to finance all the measures of the original Greek RRP. Greece has explained that certain measures should be removed or decreased in scope due to the decrease in the allocation.

(9) The modified RRP no longer contains certain measures under components 1.4 (Sustainable use of resources, climate resilience and environmental protection), 2.1 (Connect), 2.2 (Modernise), 4.3 (Improve the efficiency of the justice system) and 4.6 (Modernise and improve resilience of key economic sectors). These concern measure 16962 (Submarine fiber cables) on the deployment of submarine fibre cables connecting mainland Greece with its islands and Cyprus; measure 16287 (Public sector's business continuity) on the design and implementation of actions to ensure business continuity across public administration; measure 16723 (Skill building for creative and cultural professionals); measure 16970 (Highways for Nature and

[3] This amount corresponds to the financial allocation after deduction of Greece's proportional share of the expenses of Article 6(2) of Regulation (EU) 2021/241, calculated in accordance with the methodology of Article 11 of that Regulation.

[4] This amount corresponds to the financial allocation after deduction of Greece's proportional share of the expenses of Article 6(2) of Regulation (EU) 2021/241, calculated in accordance with the methodology of Article 11 of that Regulation.

Culture) on upgrading the physical and digital infrastructure of monuments and routes of particular natural and cultural interest, measure 16950 (Electronic Tolls) on the development of electronic toll system in Greece, and measure 16592 (Trade facilitation) on streamlining administrative procedures for companies operating in Greece to facilitate trade. The description of these measures and their associated milestones and targets should therefore be removed from the Council Implementing Decision of 13 July 2021.

(10) Furthermore, the modified RRP submitted by Greece changes measures 16934 (Upgrading Vocational Education and Training) under component 3.2 (Education, vocational education and training, and skills); measure 16685 (Diversity awareness) under component 3.4 (Increase access to effective and inclusive social policies); and measure 16727 (Digital Transformation of Justice (E-Justice)) under component 4.3 (Improve the efficiency of the justice system) to reflect the updated maximum financial contribution. Notably, milestone 152 of measure 16934 (Upgrading Vocational Education and Training) under component 3.2 (Education, vocational education and training, and skills); milestone 184 of measure 16685 (Diversity awareness) under component 3.4 (Increase access to effective and inclusive social policies); and milestones 229 and 239 of measure 16727 (Digital Transformation of Justice (E-Justice)) under component 4.3 (Improve the efficiency of the justice system) are changed to decrease the level of required implementation compared to the original plan to reflect the decreased allocation.

Amendments based on Article 21 of Regulation 2021/241

(11) The amendments to the RRP submitted by Greece because of objective circumstances concern 60 measures.

(12) Greece has explained that nine measures are amended because of unexpected obstacles, delays related to procurement and the transfer of property rights. This concerns, respectively, milestone 39 of measure (16932 Olympic Athletic Centre of Athens) under component 1.2 (Renovate); target 80 of measure 16283 (Implementation of Regional Civil Protection Centers (PEKEPP) through PPP schemes) under component 1.4 (Sustainable use of resources, climate resilience and environmental protection); milestone 182 of measure 16925 (Digital Transformation of the social support system) under component 3.4 (Increase access to effective and inclusive social policies); milestone 212 of measure 16702 (Enhancing the AML/CFT framework), and measure 16711 (Professionalisation of the Public Procurement domain) under component 4.2 (Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption); milestones 247 and 249 of measure 16624 (Creation - expansion - upgrade of infrastructures of research centres supervised by the General Secretariat for Research and Innovation (GSRI)) under component 4.5 (Promote research and innovation); milestones 255 and 256 of measure 16628 (Central Greece Highway E-65: Trikala-Egnatia Section), target 261 and milestone 262 of measure 16630 (Cretan Northern Highway (B.O.A.K.)), milestone 306 of measure 16599 (Digitisation of Economic Diplomacy Network) all under component 4.6 (Modernise and improve resilience of key economic sectors). On this basis, Greece has requested to amend the scope of the aforementioned milestones and targets and/or extend their implementation timeline, and the Council Implementing Decision should be amended accordingly.

(13) Greece has explained that one measure is no longer achievable within the timeline nor at the level of costs estimated in the original RRP, because of high inflation, especially of construction costs. This concerns, respectively, milestone 186 of measure 16922 (Social Integration) under component 3.4 (Increase access to effective and inclusive social policies). On this basis, Greece has requested to extend the implementation timeline of the aforementioned milestone, and the Council Implementing Decision should be amended accordingly

(14) Greece has explained that 15 measures are amended because unforeseen measure-specific challenges, such as more complex than initially foreseen legal and technical requirements, have caused delays in the implementation. This concerns, respectively, milestone 59 of measure 16772 (Waste management law for the implementation of sustainable landfilling and recycling) under component 1.4 (Sustainable use of resources, climate resilience and environmental protection); milestone 136 of measure 16750 (Digital Transformation of Labour Systems) under component 3.1 (Promote job creation and participation in the labour market); milestone 144 of measure 16747 (Active Labour Market Policies) under component 3.1 (Promote job creation and participation in the labour market); milestone 161 of measure 16755-(Reform of the Primary Health Care System) under component 3.3 (Improve resilience, accessibility and sustainability of healthcare); milestone 175 of measure 16726 (Social Benefits Optimization) under component 3.4 (Increase access to effective and inclusive social policies); milestones 176 and 179 of measure 16904 (Disability); milestone 241 of measure 16580 (Implementation of the new unified insolvency framework for the restructuring of debt and 2nd chance) under component 4.4 (Strengthen the financial sector and capital markets); milestone 269 of measure 16833 (Implementation of EASA compliance rectification works) under component 4.6 (Modernise and improve resilience of key economic sectors); milestone 280 of measure 16293 (Culture as a driver of growth) under component 4.6 (Modernise and improve resilience of key economic sectors); milestones 293 and 298 of measure 16975 (Upgrade Interventions for Regional Ports) under component 4.6 (Modernise and improve resilience of key economic sectors); milestone 295 of measure 16931 (Tourism Development) under component 4.6 (Modernise and improve resilience of key economic sectors); milestone 296 of measure 16921 (Reskilling and Upskilling in Tourism) under component 4.6 (Modernise and improve resilience of key economic sectors); milestone 304 of measure 16634 (New Industrial Parks) under component 4.6 (Modernise and improve resilience of key economic sectors); milestone 317 of measure 16543 (Actions for the simplification of the business environment and its upgrading in quality and safety) under component 4.7 (Improve competitiveness and promote private investments and exports). On this basis, Greece has requested to extend the implementation timeline of the aforementioned milestones and targets, and the Council Implementing Decision should be amended accordingly.

(15) Greece has explained that 17 measures are amended or withdrawn because unforeseen measure-specific challenges called for an alternative approach to achieving the measure's objective or induced a need to adapt the measure to achieve similar objectives in a more effective way. This concerns, respectively, measure 16831 (Produc- E Green) under component 1.3 (Recharge and refuel); milestones 66, 71 and 74 of measure 16850 (Drinking Water Supply and Saving Infrastructures) under component 1.4 (Sustainable use of resources, climate resilience and environmental protection); measure 16882 (Flood mitigation projects) under component 1.4 (Sustainable use of resources, climate resilience and environmental protection); measure 16898 (Water Supply Projects) under component 1.4 (Sustainable use of

resources, climate resilience and environmental protection); milestones 312 and 316 of measure 16285 (Investments in the national irrigation network through PPP schemes) under component 1.4 (Sustainable use of resources, climate resilience and environmental protection); milestone 88 and target 91 of measure 16834 (5G Corridors – Develop 5G networks that shall provide coverage of all Greek motorways that are part of the Trans-European Transport Networks) under component 2.1 (Connect); milestone 334 of measure 16857 (Switch to fast broadband connections – Transition to 100/200 Mbps (UltraFast) broadband connections and strengthening of Superfast Broadband demand) under component 2.1 (Connect); milestone 242 of measure 16576 (Establishment of the Credit Expansion Observatory) under component 4.4 (Strengthen the financial sector and capital markets); milestones 167 and 168 of measure 16752 (Digiatl Transformation of Health (DigHealth)) under component 3.3 (Improve resilience, accessibility and sustainability of healthcare); milestone 185 of measure 16763 (Digitalization of the Migration and Asylum System) under component 3.4 (Increase access to effective and inclusive social policies); milestones 192 and 194 of measure 16611 (Digital transformation of tax audit) under component 4.1 (Making taxes more growth friendly and improving tax administration and tax collection); milestone 208 of measure 16972 (Reforming public administration) under component 4.2 (Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption); milestones 228 and 235 of measure 16733 (Skills and Digital Skills for Judges and Judicial Employees), under component 4.3 (Improve the efficiency of the justice system); milestone 248 of measure 16654 (TH²ORAX: Trellis Holistic & Hybrid Operational Ruggedized Autonomous eXemplary system) under component 4.5 (Promote research and innovation); milestone 268 of measure 16982 (Organisational reform in the railways sector) under component 4.6 (Modernise and improve resilience of key economic sectors); milestone 285 of measure 16725 (Upgrading higher arts education) under component 4.6 (Modernise and improve resilience of key economic sectors); measure 16954 (Interventions for the upgrade and redeployment of the Greek rail network system and infrastructure) under component 4.6 (Modernise and improve resilience of key economic sectors). On this basis, Greece has requested to amend the scope or withdraw the aforementioned milestones and targets, or extend the implementation timeline, and the Council Implementing Decision should be amended accordingly.

(16) Greece has explained that part of one existing measure is no longer achievable, because of the unforeseen consequences of the energy crisis caused by Russia's war of aggression in Ukraine. This concerns target 15 of measure 16871 (Revitalization actions of the most affected territories (Just transition territories)) under Component 1.1 (Power-up). On this basis, Greece has requested to amend the aforementioned target, and the Council Implementing Decision should be amended accordingly.

(17) Greece has explained that 10 measures are no longer totally achievable, because of lower-than-expected demand and supply chain disruptions. This concerns, respectively, milestone 34 and target 35 of measure 16876 (Energy upgrade of public sector buildings) under component 1.2 (Renovate); milestones 49, 52 and 55 of measure 16924 (Electromobility) under component 1.3 (Recharge and refuel); milestone 110 of measure 16780 (Further Modernisation of Public Administration's One-Stop Shops) under component 2.2 (Modernise); milestone 131 of measure (16706 – Digital transformation of SMEs) under component 2.3 (Digitalisation of businesses); milestone 150 of measure 16289 (Strategy for Excellence in Universities &

Innovation) under component 3.2 (Education, vocational education and training, and skills); milestones 177 and 178 of measure 16919 (Child protection) under component 3.4 (Increase access to effective and inclusive social policies); milestone 181 of measure 16945 (Creation of childcare units within large companies); milestone 187 of measure 16688 (Promote integration of the refugee population into the labour market) under component 3.4 (Increase access to effective and inclusive social policies); milestone 189 of measure 16614 (Online cash registers and POS) under component 4.1 (Making taxes more growth friendly and improving tax administration and tax collection); target 330 of measure 16980 (RRP Loan Facility) under component 4.7 (Improve competitiveness and promote private investments and exports). On this basis, Greece has requested to amend and/or to reduce the scope of the aforementioned milestones and targets, and the Council Implementing Decision should be amended accordingly.

(18) Greece has further requested to use the remaining resources freed up by the removal of measures under Article 21 of Regulation 2021/241 to include four new measures. This concerns investments that enhance seismic prevention and increase the resilience of infrastructure in relation to natural disasters, with milestone 332 of measure 16983 (Preliminary inspection of seismic resistance of buildings) under component 1.4 (Sustainable use of resources, climate resilience and environmental protection); fire-protection, restoration, anti-flood and anti-erosion measures captured in milestone 61, 62 and 63 of measure 16849 (National Reforestation Plan, restoration and prevention ("antiNERO"), anti-erosion and flood protection measures) in component 1.4; support the restoration of rail and road networks in the areas affected by the storm "Daniel", with milestones 347, 348, 349 and 350 of measure 16999 (Accessibility Restoration following the devastating effects of storm "Daniel"; and a Phase II for the smart bridges investment, with milestone 272a of measure 16949 (Smart Bridges) under component 4.6 (Modernise and improve resilience of key economic sectors).

(19) Greece has requested to include new reforms under four measures. In particular, new reforms aim at addressing the shortage of personal doctors to enhance the full rollout of the primary healthcare reform, with milestones 335 and 336 of measure 16984 (Personal Doctor reform) under component 3.3 (Improve resilience, accessibility and sustainability of healthcare); improving tax revenues and incentives through promoting electronic payments and improving the structure of taxes on the self-employed, with milestones 337, 338, 339 and 340 of measure 16985 (Modifications to Greece's tax policy framework) under component 4.1 (Making taxes more growth friendly and improving tax administration and tax collection); and completing the reform of the national cadastre with the finalisation of the cadastral mapping and the full transition to the new organisational structure of the Hellenic Cadastre, with milestones 341, 342, 343, 344 and 345 of measure 16986 (Completion of the national cadastre) under component 4.2 (Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption). Greece has also widened the scope of the financial sector reforms already contained in the plan addressing the debt enforcement process and the non-performing loans' secondary market, with milestones 244a, 244b, 244c of measure 16957 (Strengthening the capacity of the financial system to overcome legacy challenges and finance the real economy) under component 4.4. (Strengthen the financial sector and capital markets).

(20) The Commission considers that the reasons put forward by Greece justify the update pursuant to Article 18(2) of Regulation (EU) 2021/241 and the amendment pursuant to Article 21(2) of that Regulation.

Corrections of clerical errors

(21) 54 clerical errors have been identified in the text of the Council Implementing Decision, affecting 40 milestones/targets and 41 measures. The Council Implementing Decision should be amended to correct those clerical errors that do not reflect the content of the RRP submitted to the Commission on 27 April 2021, as agreed between the Commission and Greece. Those clerical errors relate to:

– Measure description of measure 16879 (Preparation of Urban Plans in implementation of the urban policy reform), measure description of measure 16891 (Establishment of new maritime spatial planning), targets 23, 24, 25 and 26 of measure 16872 (Energy renovation on residential buildings), and milestone 38 of measure 16873 (Interventions in residential areas and in the building stock) under Component 1.2 (Renovate);

– Milestone 83 and measure description of measure 16912 (Forest firefighting, prevention and response equipment), milestone 64 and measure description of measure 16851 (Biodiversity protection as a driver for sustainable growth), and milestones 68, 72, and 73 of measure 16846 (Urban Wastewater and Sludge Management Infrastructures from Wastewater Treatment) under component 1.4 (Sustainable use of resources, climate resilience and environmental protection);

– Milestone 333 of measure 16844 (Transition to 5G technology, facilitating the development of innovative remote service) under component 2.1 (Connect);

– Measure description of measure 16810 (CRM for the General Government), milestone 99 and measure description of measure 16929 (Towards Public Administration's "customer"-oriented services through simplification and improvement of processes, systems enhancements and compliance with European strategies and policies), milestone 113 of measure 16738 (Central Document Management System), measure description of measure 16826 (Digital skills upgrade programs for conscripts), measure description of measure 16791 (Digital Transformation of the Greek National Tourism Organisation), milestone 116 of measure 16964 (Next-Generation Interoperability Centre (KED)), milestone 117 of measure 16785 (Tourism Registry e-MHTE), measure description of measure 16854 (Smart cities), and milestone 95a of measure 16778 (Digitisation of archives and related services) under component 2.2 (Modernise);

– Measure description and milestones 141 and 141b of measure 16941 (Restructuring and rebranding of DYPA local PES (KPA2)), measure description and milestone 142a of measure 16746 (Reform of Passive Labour Market Policies to Support Transitions to Employment), and milestone 135a of measure 16942 (Digital transformation of the public employment service (OAED)) under component 3.1 (Promote job creation and participation in the labour market);

– Milestones 145, 145a and 145b of measure 16794 (Strengthening the Apprenticeship System), milestone 146 and measure description of measure 16792 (Labour force skilling, reskilling and upskilling through a reformed training model (Vocational Education & Training Reform)), and milestones 148a and 148b of measure 16676 (Digital transformation of Education) under component 3.2 (Education, vocational education and training, and skills);

– Measure description of measure 16783 (Implementation of the National Public Health Prevention Program "Spiros Doxiadis" (NPP "SD")), milestone 156 of measure 16816 (Reforms and acceleration of investments in the Healthcare Sector - Clawback reduction and rationalization of healthcare expenditure), milestone 169 of measure 16753 (Establishment of Home Health Care & Hospital at Home systems), and title of Group 14 under component 3.3 (Improve resilience, accessibility and sustainability of healthcare);

– Measure description and milestones 203 and 204 of measure 16643 (Codification and simplification of tax legislation), milestones 195 and 196 of measure 16291 (Digital Transformation of the Tax and Customs Administration) under component 4.1 (Making taxes more growth friendly and improving tax administration and tax collection);

– Milestone 213 and measure description of measure 16703 (Combating illegal trade and protecting intellectual property) under component 4.2 (Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption);

– Milestone 238 and measure description of measure 16575 (Accelerating the administration of justice) under component 4.3 (Improve the efficiency of the justice system);

– Milestone 243 of measure 16581 (Enhanced capital market supervision and trustworthiness) under component 4.4 (Strengthen the financial sector and capital markets);

– Milestone 250 and measure description of measure 16618 (Basic & Applied Research), milestone 252 of measure 16971 (Research – Create – Innovate), milestone 346 of measure 16622 (HORIZON 2020 "Seal of Excellence": financing top innovative companies), and measure description of measure 16621 (Extroversion of the Research and Innovation Ecosystem of Greece), under component 4.5 (Promote research and innovation);

– Milestone 258 of measure 16631 (Road safety upgrade), measure description of measure 16626 (Economic transformation on the Agricultural Sector), milestone 289 of measure 16735 (Utilizing "arts on prescription", promoting social cohesion, and tapping on the silver economy), measure description of measure 16593 (Amendment of the legal framework for the attraction of strategic investment), and measure description of measure 16944 (Master plan for the renewal of the Greek passenger shipping fleet) under component 4.6 (Modernise and improve resilience of key economic sectors).

– Milestone 318 of measure 16591 (Ease of doing business) under component 4.7 (Improve competitiveness and promote private investments and exports).

– Those corrections do not affect the implementation of the measures concerned.

The REPowerEU chapter based on Article 21c of Regulation 2021/241

(22) The REPowerEU chapter includes seven new reforms and four new investments. One of these investments concerns two scaled-up sub-investments (on energy efficiency renovations), whereas another investment is scaled-up (on energy storage).

(23) The chapter contains a set of reforms to foster decarbonisation, renewable energy and renewable gases: (1) a reform concerning the introduction of a legislative framework

to allow and facilitate the production, storage, transport and use of renewable hydrogen and biomethane, (2) a reform concerning the establishment of the regulatory and market operation framework for carbon capture, usage, and storage technologies to foster industry decarbonisation in Greece, (3) a reform concerning the optimisation of land and sea space usage for the development of renewables, in addition to the further advancement of the legislative framework for the installation of offshore wind farms, (4) a reform to increase grid and storage capacity by addressing grid stability and bottlenecks, creating resilience against high electricity prices, increasing the flexibility of the system and fostering the integration of renewables, (5) the reform of the regulatory framework for smart grids in Greece to accelerate the implementation of smart and digital technologies in the distribution network, and foster demand side response for the final consumer, (6) a reform aiming at promoting energy sharing, thus encouraging the use of renewables by allowing decentralised generation and sharing among multiple small-scale renewable energy systems, hence enhancing self-consumption and renewable energy communities, (7) a reform introducing a roadmap for innovative energy efficiency interventions, including the identification and launch of new non-grant based financial instruments.

(24) In addition, the chapter contains investments in energy efficiency and promotion of renewables for self-consumption including five different subprogrammes, specifically in (i) the energy renovation of residential buildings through the provision of subsidies (scaled-up investment); (ii) the energy renovation of the non-residential public and private buildings through the provision of subsidies and low interest loans (scaled-up investment); (iii) the increase of photovoltaic systems for self-consumption in residential buildings and in the agricultural sector through the provision of subsidies; (iv) the promotion of renewable energy sources in residential buildings by financing the installation of new renewable systems to produce hot water; and (v) the improvement of energy efficiency in municipal water and sewerage utilities through the replacement of the existing electro-mechanical equipment in the wells with new and more energy efficient. Another investment aims to increase the installation of energy storage systems for additional renewables penetration and is a scale up of a current measure under the Greek RRP (16926). Finally, a set of pilot projects for biomethane and renewable hydrogen production and the promotion of carbon capture and storage (CCS) technologies in hard-to-abate industries will be put in place to foster industry decarbonisation.

(25) The REPowerEU chapter includes actions that aim at helping address energy poverty. In particular, the reform on energy sharing is expected to establish a set of policy tools to promote collective self-consumption, energy sharing and renewable energy communities, which are expected to result in lower energy costs for energy poor households. In addition, the reform on energy efficiency interventions aims, among other, at establishing a targeted approach (including the design of policy programmes) for larger energy savings for energy poor households and vulnerable social groups. Further, the investment in energy efficiency renovations specifically targets lower income households, as was the case with the similar measure that was part of the original plan.

(26) The Commission has assessed the modified RRP including the REPowerEU chapter against the assessment criteria laid down in Article 19(3) of Regulation 2021/241.

Balanced response contributing to the six pillars

(27) In accordance with Article 19(3), point (a), of and Annex V, criterion 2.1, to Regulation (EU) 2021/241, the modified RRP including the REPowerEU chapter represents to a large extent (Rating A) a comprehensive and adequately balanced response to the economic and social situation, thereby contributing appropriately to all of the six pillars referred to in Article 3 of that Regulation, taking into account the specific challenges faced by and the financial allocation for the Member State concerned.

(28) The modification of the plan, along with the REPowerEU chapter has a material impact and improvement on the assessment of the contribution of the RRP to the green transition (first pillar). The measures comprising the REPowerEU chapter address to a large extent the objectives of the REPowerEU Plan, namely saving energy, producing clean energy and diversifying energy supply and are expected to contribute to the green transition and to smart, sustainable and inclusive growth. For the other pillars, the nature and extent of the proposed modifications to the RRP do not have an impact on the previous overall assessment.

(29) While the withdrawal of the measures related to the development of Submarine Fibre Cables and the 5G networks reduces the RRP's contribution to the digital transformation (second pillar), the contribution of the package to the pillar remains substantial. The modified plan is expected to also continue strengthening the country's health and economic, social, and institutional resilience (fifth pillar). As for the first pillar, the modified RRP includes additional measures to address green challenges, namely anti-erosion and flood protection measures brought forward after the natural disasters in 2023. The significant increase in scope of the RRF Loan Facility is expected to support private investment primarily related to the first two pillars, namely green transition and digital transformation, but is expected to also contribute to increasing export capacity, economies of scale, and research and innovation.

Addressing all or a significant subset of challenges identified in country-specific recommendations

(30) In accordance with Article 19(3), point (b), of and Annex V, criterion 2.2, to Regulation (EU) 2021/241, the modified RRP including the REPowerEU chapter is expected to contribute to effectively addressing all or a significant subset of challenges (Rating A) identified in the relevant country-specific recommendations addressed to Greece, including fiscal aspects thereof, and recommendations made pursuant to Article 6 of Regulation (EU) No 1176/2011, or challenges identified in other relevant documents officially adopted by the Commission in the context of the European Semester.

(31) In particular, the modified RRP takes into account country-specific recommendations formally adopted by the Council prior to the assessment of the modified plan by the Commission. As the size of the plan increased following an additional loan request intended to be used not exclusively for REPower objectives, all 2022 and 2023 structural recommendations are considered in the overall assessment.

(32) Having assessed progress in the implementation of all relevant country-specific recommendations as part of the 2023 European Semester, the Commission finds that substantial progress has been achieved with respect to the recommendation on completing outstanding reforms that have been pursued under enhanced surveillance (CSR 2.3 2022). In particular, as reported in the 1st post-programme surveillance report adopted by the Commission on 22 November 2022, Greece was assessed to have, across various areas, implemented the specific reform commitments that have

been agreed between the European institutions and the Greek authorities to be completed by November 2022. This included progress with cadastral mapping, recognising that further effort was still needed for its completion. Further, substantial progress has also been achieved with expanding public investment for the green and digital transitions (CSR 1.2 2022) and with pursuing a fiscal policy aimed at achieving prudent medium-term fiscal positions and ensuring credible and gradual debt reduction and fiscal sustainability in the medium term (CSR 1.3 2022).

(33) The modified RRP includes an extensive set of mutually reinforcing reforms and investments that contribute to effectively addressing all or a significant subset of the economic and social challenges outlined in the country-specific recommendations addressed to Greece by the Council in the context of the European Semester, notably on tax policy and tax administration, public administration and financial sector (CSR 1.6-1.10 2023 and CSR 1.4-1.6 2022), on health sector and the cadastre (CSR 3.1-3.2 2023, and CSR 2.3 and CSR 3 2022), and on the energy sector (CSR 4.1-4.6 2023 and CSR 4.1-4.6 2023)

(34) The modified RRP includes a new tax policy reform and is set to strengthen the measures relating to the financial sector. Under Component 4.6, Greece has included a new reform measure aiming to enhance the transparency of its the tax framework and the further use of electronic payments to combat tax evasion. Specific actions include legal provisions to improve the structure of self-employment taxation, the replacement of stamp duty with a simpler digital tax, and a major extension of the mandatory acceptance of direct electronic payments in the retail market. This new reform measure is expected to contribute to the long-term sustainability of Greece's public finances. Under Component 4.4, Greece has widened the scope of the financial sector reforms already contained in the plan addressing the debt enforcement process and the NPL secondary market. These new and strengthened measures are expected to contribute towards meeting the related sub-parts under CSR 1.6, 1.7, 1.8 and 1.10 2023 and CSR 1.5 2022).

(35) The modified RRP also includes the completion of the cadastre reform and new healthcare measures. The completion of the national cadastre (part of Component 4.2), a long-standing project, is expected to further improve Greece's business environment by enhancing efficiency and strengthening legal certainty. Specifically, actions to complete cadastral mapping and the transition to the new 'Hellenic Cadastre Agency' is expected to contribute to addressing CSR 3.2 2023 and CSR 2.3 2022. Greece also proposed a new reform of personal doctors (part of Component 3.3), which is expected to contribute to address CSR 3.1 2023 and CSR 3.1 2022. The new reform includes actions that aim at increasing the enrolment of general practitioners and internists in order to achieve full population coverage and population registration.

(36) The REPowerEU chapter introduces new measures contributing to reducing the reliance on fossil fuels (CSR 4 2023 and CSR 4 2022). New reform measures aim to further expand the deployment of renewable energy by completing the legal framework for offshore wind farms and putting in place new legislative frameworks for the production of renewable hydrogen and bio-methane. New investment measures support the increase of storage capacity and the decentralised production of renewable energy. Further, additional support is allocated to improve the energy efficiency of households, including targeted support for energy-poor households, and the private sector.

(37) By addressing the aforementioned challenges, the modified RRP is expected to also contribute to correcting the imbalances, as identified in recommendations made pursuant to Article 6 of Regulation (EU) No 1176/2011 in the period 2019-2023, that Greece is experiencing, in particular with regard to high government debt and a high stock of non-performing loans in a context of high unemployment, as well as a deteriorated external position.

Contribution to growth potential, job creation and economic, social and institutional resilience

(38) In accordance with Article 19(3), point (c), of and Annex V, criterion 2.3, to Regulation (EU) 2021/241, the modified RRP including the REPowerEU chapter is expected to have a high impact (Rating A) on strengthening the growth potential, job creation, and economic, social and institutional resilience of Greece, contributing to the implementation of the European Pillar of Social Rights, including through the promotion of policies for children and youth, and on mitigating the economic and social impact of the COVID-19 crisis, thereby enhancing the economic, social and territorial cohesion and convergence within the Union.

(39) The modified RRP including the REPowerEU chapter continues to contribute to social cohesion. The modified RRP includes significant measures to address long-standing social challenges, including the low accessibility of healthcare services, the still high unemployment and the energy poverty. A new reform of the primary healthcare system (personal doctor) is expected to increase access to healthcare, reduce inequalities, and promote disease prevention. Under the REPowerEU chapter, the energy renovations of residential buildings and the large-scale investments in renewable energy sources and energy storage capacities is expected to support economic growth and employment in a wide range of economic sectors and activities, while helping eliminate energy poverty. A new investment on the preliminary inspection of seismic resistance of schools, universities, hospitals, police stations and fire stations is expected to improve crisis management and hazard mitigation and increasing economic and social resilience. The reform on the Hellenic Cadastre is expected to have a positive economic and social impact by providing clear property rights and titles and an efficient land registry system, thereby facilitating economic activities related to real estate transactions and promoting private investments.

(40) The increase in the scope of the RRP Loan Facility measure is expected to boost growth and job creation through the financing of long-term private investments in the green and digital transition among other areas.

(41) These measures are expected to help deliver on the implementation of the European Pillar of Social Rights Action Plan endorsed at the Porto Summit of 7 May 2021 and are expected to contribute to improving the levels of the indicators of the Social Scoreboard.

Do no significant harm

(42) In accordance with Article 19(3), point (d), of and Annex V, criterion 2.4, to Regulation (EU) 2021/241, the modified RRP including the REPowerEU chapter is expected to ensure that no measure (Rating A) for the implementation of reforms and investments projects included in this 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[5] (the principle of 'do no significant harm').

(43) The modified plan, including the new Component 19 (REPowerEU chapter) assesses compliance with the "do no significant harm" principle following the methodology set out in the Commission´s technical guidance on the application of "do no significant harm" under the Recovery and Resilience Facility Regulation (2021/C58/01). None of the measures included in the REPowerEU chapter requires a DNSH derogation. The assessment is done systematically for each modified reform and investment following a two-step approach. The assessment concludes that for all modified measures, there is either no risk of significant harm or, where a risk is identified, a detailed assessment is conducted demonstrating the absence of significant harm. Greece provided a detailed assessment for the new measures relating to carbon capture, renewable hydrogen and bio-methane. 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. For example, in the case of hydrogen, specific safeguards were inserted related to the production typologies to be financed, together with specific reference to hydrogen to be "renewable", bio-methane to be "sustainable" and in line with the Renewable Energy Directive and its Delegated Acts (2018/2001/EU)[6]. Concerning the investment for the promotion of CCS technologies to foster industry decarbonisation, specific safeguards are foreseen to ensure compliance with the DNSH Technical Guidance and the applicable Union law, regarding the construction of the transport infrastructure. Regarding the origin of the capture and transported CO2, it shall be compliant with the DNSH requirements that exclude CO2 originating from the use of fossil fuels or emitters beyond the ETS benchmark, in order to ensure the absence of support to fossil fuels. Based on information provided, it can be concluded that the plan is expected to ensure that no measure does significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852

Contribution to the REPowerEU objectives

(44) In accordance with Article 19(3), point (da), of and Annex V, criterion 2.12, to Regulation (EU) 2021/241, the REPowerEU chapter is expected to effectively contribute to a large extent (Rating A) to energy security, the diversification of the Union's energy supply, an increase in the uptake of renewables and in energy efficiency, an increase of energy storage capacities or the necessary reduction of dependence on fossil fuels before 2030.

(45) The measures included in the chapter contribute to the objectives of Article 21c(3), points (b), (c), (d) and (e), since they respectively aim at increasing Greece's energy efficiency, at decarbonising its industry, increasing the production of biomethane and of renewable hydrogen, as well as accelerating the deployment of renewable energy, at addressing energy poverty , incentivising the reduction of energy demand , and addressing internal and cross border energy transmission and distribution bottlenecks, supporting electricity storage and accelerating the integration of renewable energy sources.

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5 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).

6 Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast), (OJ L 328, 21.12.2018, p. 82).

(46) Concerning the objective of Article 21c(3), point (b) of Regulation (EU) 2021/241 regarding energy efficiency, the proposed measures include: (i) a set of energy efficiency investments aiming both at scaling-up the existing renovation programmes under the RRP and at promoting energy efficiency actions in municipal water and sewerage utilities, altogether with the installation of solar water heaters in residential buildings and of solar photovoltaics for self-consumption and use in the agricultural sector; and (ii) a reform to set out a roadmap for innovative energy efficiency interventions and the identification of new financial instruments for this purpose. Concerning the promotion of the industry decarbonisation and the production of biomethane and renewable hydrogen, Greece proposes (i) the establishment of a regulatory and market operation framework for carbon capture, usage and storage (CCS) technologies; (ii) the development of a licensing and support scheme framework for biomethane and renewable hydrogen; (iii) an investment in pilot projects for biomethane and renewable hydrogen production and (iv) promotion of CCS technologies. Finally, regarding the deployment of renewable energy sources, the chapter includes: (i) the scale-up of an investment to increase electricity storage capacity in Greece, which is expected to enable the increase of renewable energy potential across the country; (ii) a reform to optimise land and sea space usage for the development of renewables and complete the legislative framework for offshore wind energy already started within the Greek RRP; (iii) a reform to foster grid and storage capacity in Greece; (iv) a reform for the promotion of smart grid technologies and practices in the electricity market of Greece, and (v) a reform aiming at the development of a more complete legislative framework and the set-up of various policy tools to promote energy sharing, collective self-consumption and renewable energy communities.

(47) Energy poverty, in line with Article 21c(3), point (c) of Regulation (EU) 2021/241, is addressed through two new reforms and the scale up of energy efficiency investments in residential buildings. Greece introduced a set of policy tools to promote collective self-consumption, energy sharing and renewable energy communities, which is expected to promote a larger use of decentralised renewables production, consumption, and energy sharing. In addition, the reform on energy efficiency interventions aims, among other, at establishing a targeted approach (including the design of policy programmes) for larger energy savings for energy poor households and vulnerable social groups. Finally, part of the energy efficient interventions should be targeted to renovations for lower income households, as it was the case for the first energy renovation programme in the plan.

(48) The reduction of the energy demand is to be met through the above-mentioned energy efficiency investments aiming at the improvement of the energy performance in residential buildings, leading to a meaningful reduction of the energy demand for heating, cooling and domestic hot water. The investment concerning municipal water and sewerage utilities is expected to also contribute to the objective in question. Finally, the abovementioned reform aiming at setting out a roadmap for energy efficiency interventions is expected to help in the design of future energy efficiency national programmes that should not rely exclusively on non-repayable support , thus contributing to further potential energy savings.

(49) The modifed RRP also includes measures aiming at improving electricity storage, in line with Article 21c(3), point (e) of Regulation (EU) 2021/241. The REPowerEU chapter includes the scale-up of an investment to increase energy storage capacity in

Greece. A reform is also included to promote and facilitate investments in the electricity grid and to increase storage capacity.

(50) All the above measures are expected to contribute to the REPowerEU objectives in coherence and complementarity with a number of other reforms and investments in the RRP, mainly under Components 1.1- 1.3, as well as under other national initiatives or EU funded programmes such as programmes co-funded by the Cohesion Policy and the Just Transition Funds (e.g., Revitalisation of the Just Transition Territories).

(51) Therefore, the REPowerEU chapter is expected to effectively contribute to a large extent (Rating A) to the objective, as it is expected to be focused on investments and reforms aiming at tackling more than one REPowerEU objectives.

Measures having a cross-border or multi-country dimension or effect

(52) In accordance with Article 19(3), point (db), of and Annex V, criterion 2.13, to Regulation (EU) 2021/241, the measures included in the REPowerEU chapter are expected to a large extent (Rating A) to have a cross-border or multi-country dimension or effect.

(53) All measures in the REPowerEU chapter have a cross-border or multi-country dimension or effect. The measures in the REPowerEU chapter are expected to directly contribute to the integration of renewable energy sources and the reduction of energy demand. As a result, they contribute to reducing the dependency on fossil fuels, building flexibility in energy management and securing energy supply in the Union as a whole, and can therefore be considered as having a positive cross-border effect in line with the Commission's guidance in the context of REPowerEU.

(54) The total costs of the measures having a cross-border or multi-country dimension or effect is EUR 795 000 000, corresponding to 100% of the estimated cost of the REPowerEU chapter.

(55) The measures included in the REPowerEU Chapter are expected to boost the production of renewable energy, thereby contributing to the exports of clean energy to other parts of the Union. Similarly, the measures to increase energy efficiency and to decarbonise industry are also expected to contribute to the Union's decarbonisation efforts. These are expected to contribute to reducing the dependency on fossil fuels and to reducing energy demand and are therefore considered as having a positive cross-border effect.

Contribution to the green transition including biodiversity

(56) In accordance with Article 19(3), point (e), of and Annex V, criterion 2.5, to Regulation (EU) 2021/241, the modified RRP including the REPowerEU chapter 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 38.1% of the RRP's total allocation and 78.1% of the total estimated costs of measures in the REPowerEU chapter calculated in accordance with the methodology set out in Annex VI to that Regulation. In accordance with Article 17 of Regulation (EU) 2021/241, the modified RRP including the REPowerEU chapter is consistent with the information included in the National Energy and Climate Plan 2021-2030.

(57) The modified plan maintains measures supporting the green transition that contribute to achieving the 2030-2050 targets and the objective of EU's climate neutrality by

2050, as well as fostering biodiversity. For instance, the ambition of the reforestation and restoration measure in the Greek RRP (16849) has been considerably increased.

(58) In addition to the measures in the original RRP, measures in Greece's REPowerEU chapter considerably reduce the greenhouse gas intensity of energy used in Greece and contribute to achieving the 2030-2050 targets and the Union's objective of climate neutrality by 2050, and hence positively contribute to the green transition. Reforms and investments in the chapter aim to incentivise energy saving measures, diversify energy supplies and accelerate the deployment of renewable energy sources, including establishment of policy tools to promote energy sharing, collective self-consumption and renewable energy communities. Furthermore, REPowerEU measures cover investments aiming to strengthen electricity storage capacity and a reform to promote smart grid technologies and practices in Greece's electricity market. All these measures positively contribute to the green transition in Greece by reducing energy demand, promoting energy efficiency and accelerate the transition from high-emitting energy sources to renewables.

Contribution to the digital transition

(59) In accordance with Article 19(3), point (f), of and Annex V, criterion 2.6, to Regulation (EU) 2021/241, the modified RRP contains measures that contribute to a large extent to the digital transition or to addressing the challenges resulting from it. The measures supporting digital objectives account for an amount which represents 22.1% of the modified RRP's total allocation calculated in accordance with the methodology set out in Annex VII to that Regulation.

(60) The measures in the modified plan continue contributing to the digital transition or helping to address the related challenges and address well Greece's shortcomings in the digital field as identified in the Digital Economy and Society Index (DESI). The modified plan continues to significantly address the digital transition challenges faced by Greece in the areas of connectivity, digital public services, human capital and digital skills, digitalisation of businesses and adoption of advanced digital technology.

Lasting impact

(61) In accordance with Article 19(3), point (g), of and Annex V, criterion 2.7, to Regulation (EU) 2021/241, the modified RRP including the REPowerEU chapter is expected to have a lasting impact on Greece to a large extent (Rating A).

(62) The new and modified measures included in the modified plan are complementary to the ones included in the original RRP and are expected to have a lasting structural impact, including by improving the functioning of Greece's institutions and increasing resilience.

(63) Newly added reforms aim at addressing the shortage of personal doctors to enhance the full rollout of the primary healthcare reform, at improving tax revenues and incentives, and completing the reform of the cadastre. These are reforms of structural nature that strengthen Greece's administration and institutions. The inclusion of a new REPowerEU chapter is further expected to have a long-term positive impact by accelerating the green transition and ensuring energy security.

(64) New investments are aimed at increasing seismic prevention and the resilience of infrastructure in the wake of natural disasters, and provide support to restoration and reforestation, therefore contributing to long-term environmental sustainability. Measures addressing energy efficiency and support for the renovation of housing are expected to have a wider social impact. Furthermore, the substantial increase in the

scope of the Loan Facility is expected to substantially increase investment, with a positive and lasting impact on demand and long-term output.

Monitoring and implementation

(65) In accordance with Article 19(3), point (h), of and Annex V, criterion 2.8, to Regulation (EU) 2021/241, the arrangements proposed in the modified RRP including the REPowerEU chapter are adequate (Rating A) to ensure effective monitoring and implementation of the RRP, including the envisaged timetable, milestones and targets, and the related indicators.

(66) The nature and extent of the proposed modifications to Greece's RRP do not have an impact on the previous assessment of the effective monitoring and implementation of the RRP. In particular, the RRF Agency remains the structure tasked within Greece with the monitoring and implementation of the plan. With regards to the REPowerEU chapter, the Ministry of Environment and Energy has been assigned as the competent Ministry to oversee the implementation of the new measures. In addition, the milestones and targets that accompany the modified and new measures, including those in the REPowerEU chapter, are clear and realistic and the proposed indicators for those milestones and targets are relevant, acceptable and robust. Milestones and targets are also relevant for measures already completed which are eligible under Article 17(2) of Regulation (EU) 2021/241. The satisfactory fulfilment of these milestones and targets over time is required to justify a disbursement request.

Costing

(67) 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 modified RRP including the REPowerEU chapter on the amount of the estimated total costs 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.

(68) The justification provided by Greece on the amount of the estimated costs of the original recovery and resilience plan was to a medium extent reasonable, plausible, in line with the with the principle of cost efficiency and commensurate to the expected national economic and social impact on the economy. Greece provided sufficient information and evidence that estimated costs were not covered by existing or planned Union financing. Greece's National Productivity Board validated the cost estimates. However, in a limited number of cases, costs 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.

(69) A detailed breakdown of the estimated cost per measure was provided, with the costing methodology varying across measures and the bottom-up approach being the most prevalent. For the majority of the measures, the costs are assessed as reasonable, plausible, cost efficient and commensurate. The amount of the estimated total costs of the recovery and resilience plan is also commensurate to the expected social and economic impact of the envisaged measures and the justifications provided for the cost assessment are in general sufficient. For a limited number of cost assessments, the estimated costs exceeded the cost range set by comparable projects to a medium extent. The cost assessment was assessed by an external consultant and validated by Greece's National Productivity Board. Finally, the estimated total cost of the RRP is in line with the principle of cost-efficiency and commensurate to the expected national economic and social impact.

Protection of the financial interests of the Union

(70) In accordance with Article 19(3), point (j), of and Annex V, criterion 2.10, to Regulation (EU) 2021/241, the arrangements proposed in the modified RRP including the REPowerEU chapter are adequate (Rating A) to prevent, detect and correct corruption, fraud and conflicts of interests when using the funds provided under that Regulation, and the arrangements are expected to effectively avoid double funding under that Regulation and other Union programmes. This is without prejudice to the application of other instruments and tools to promote and enforce compliance with Union law, including for preventing, detecting and correcting corruption, fraud and conflicts of interest, and for protecting the Union budget in line with Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council.[7]

(71) In the original assessment, the arrangements described in the RRP were assessed as adequate (Rating A) to prevent, detect and correct corruption, fraud and conflicts of interest when using the funds provided under that Regulation.

(72) The management and control system in the modified RRP demonstrates robust processes and structures, where the roles and responsibilities are clearly defined, and the relevant control functions are appropriately segregated for the performance of internal control tasks. The RRF coordination agency performs progress monitoring and verifies the achievement of milestones and targets. The necessary legislative arrangement in the organisational structure were made for the establishment of a dedicated unit within the General Directorate for the Audits of Co-financed Programs, under the Financial Audit Committee (EDEL). The mandate of EDEL[8] to audit the RRF measures was provided in a dedicated national act for the RRF and additional dedicated staff positions were established. The management and control system provides for the procedures that are in place to ensure compliance with applicable Union and national law, to ensure adequate level of control to prevent, detect and correct corruption, fraud, conflict of interest identified when using the RRF funds and to avoid double funding from the RRF and other Union programmes. Finally, Greece's management and control system ensures that the data on final recipients, as laid out in the RRP, are adequate and securely stored on the RRF Management Information System, bolstering efforts to prevent any misuse of the funds provided by the RRF.

Coherence of the RRP

(73) In accordance with Article 19(3), point (k), of and Annex V, criterion 2.11, to Regulation (EU) 2021/241, the modified RRP including the REPowerEU chapter includes to a high extent (Rating A) measures for the implementation of reforms and public investment projects that represent coherent actions.

(74) The reforms and investments in each component of the modified plan continue to be consistent and mutually reinforcing, and synergies and complementarities exist between components. In addition, the REPowerEU chapter is fully in line with the measures included under the original RRP to support the green transition and further reinforces the ambition of some of them, for example the promotion of energy efficiency interventions and renewable energy technologies for auto-consumption are

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7 Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a general regime of conditionality for the protection of the Union budget (OJ L 433 I, 22.12.2020, p. 1).

8 Article 189 of Law 4820/2021 (Government Gazette, Series I, No 130), Article 11 of Law 4314/2014 (GG I 265).

linked with various investments and reforms for promoting renewable energy sources and improving the energy efficiency in residential buildings and enterprises. The REPowerEU chapter is built around a consistent package of both reforms and investments that are mutually reinforcing.

Equality

(75) Greece has explained that several measures added to the RRP, including under the REPowerEU chapter, are expected to have a positive impact on socio-economic inclusion and equal opportunities for all. The introduced personal doctor reform should increase the number of personal doctors to act as the first point of contact, provide primary health care, and help citizens navigate in the health system, thereby promoting access to healthcare and equal opportunities for all. The REPowerEU chapter includes actions that aim to contribute towards addressing energy poverty. In particular, two new reforms are introduced and complemented by the upscaling of energy efficiency renovations in residential buildings. The reforms are expected to establish a set of policy tools to promote collective self-consumption, energy sharing and renewable energy communities, which are expected to result in lower energy costs for energy poor households. Further, the investment measure on energy efficiency renovations is expected to specifically target lower income households, as was the case with a measure that was part of the original plan.

Consultation process

(76) In preparation of the modified RRP, including the REPowerEU chapter, the Greek authorities launched a general public consultation process on the principles of the revised plan. The public consultation process took place between 31 July to 14 August 2023 with nine comments submitted in total. In its modified RRP, Greece sets out how the various comments were reflected in the revised plan. Further, a separate consultation process took place with the Economic and Social Committee (ESC) of Greece that submitted written feedback that was considered by the Greek authorities when finalising its modified RRP.

Positive assessment

(77) Following the positive assessment of the Commission concerning the modified RRP including the REPowerEU chapter, with the finding that the plan 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 modified RRP including the REPowerEU chapter, the relevant milestones, targets and indicators, and the amount made available from the Union for the implementation of the modified RRP including the REPowerEU chapter in the form of non-repayable financial and loan support should be set out.

Financial contribution

(78) The estimated total costs of the modified RRP including the REPowerEU chapter of Greece is EUR 36 612 904 139. As the amount of the estimated total costs of the modified RRP is higher than the updated maximum financial contribution available for Greece, the financial contribution calculated in accordance with Article 11 allocated for Greece's modified RRP including the REPowerEU chapter should be equal to the total amount of the financial contribution available for Greece's modified RRP including the REPowerEU chapter. This amount is equal to EUR 17 426 708 153.

(79) Pursuant to Article 21a(5) of Regulation (EU) 2021/241, on 31 August 2023 Greece submitted a request for the allocation of the revenue referred to in Article 21a (1) of that Regulation, shared between Member States on the basis of the indicators set out in the methodology in Annex Iva to Regulation (EU) 2021/241. The estimated total costs of the measures referred to in Article 21c(3), points (b) to (f) of that Regulation included in the REPowerEU chapter is EUR 794 821 929. As this amount is higher than the allocation share available for Greece, the additional non-repayable financial support available for Greece should be equal to the allocation share. This amount is equal to EUR 768 069 923.

(80) Additionally, in accordance with Article 4a of Regulation (EU) 2021/1755[9], on 1 March 2023 Greece submitted a reasoned request to transfer part of its remaining provisional allocation from the resources of the Brexit Adjustment Reserve to the Facility, amounting to EUR 25 600 000. That amount should be made available to support the reforms and investments in the REPowerEU chapter as additional non-repayable financial support.

(81) The total financial contribution available to Greece should be EUR 18 220 378 076.

Loan

(82) Furthermore, in order to support additional private investments in the modified RRP, Greece has requested additional loan support for a total amount of EUR 5 000 000 000, in particular to supplement the Loan Facility (measure 16980). The maximum volume of the loan requested by Greece is more than 6,8% of its 2019 gross national income in current prices. The amount of the estimated total costs of the RRP is higher than the combined financial contribution available for Greece, including the updated maximum financial contribution for non-repayable financial support, the loan support, and the REPowerEU chapter that is composed of the revenue from the emission trading system under Directive 2003/87/EC and the resources from the Brexit Adjustment Reserve. The fact that the maximum volume of the loan requested by Greece is more than 6,8% of its 2019 gross national income in current prices can be justified by exceptional circumstances. In particular, there is a substantial increase in interest rates for all euro area Member States, whereas Greece has higher financing costs compared to other euro area Member States, which translates into high corporate rates, in particular for SMEs. The lower financing costs of the Loan Facility are facilitating better access to finance for companies participating in the scheme. Moreover, the Loan Facility has demonstrated a well-functioning operational framework, robust safeguards, very good progress with implementation, and increased demand.

REPowerEU Pre-financing

(83) For the implementation of its REPowerEU chapter Greece has requested the transfer of EUR 25 600 000 from the provisional allocation from the resources of the Brexit Adjustment Reserve and EUR 768 069 923 from the revenue from the Emissions Trading System under Directive 2003/87/EC of the European Parliament and of the Council.

(84) For those amounts, pursuant to Article 21d of Regulation (EU) 2021/241, on 31 August 2023 Greece has requested pre-financing of EUR 158 733 985, that is 20% of

[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).

the funding requested. Subject to available resources, that pre-financing should be made available to Greece subject to the entry into force of, and in accordance with, an agreement to be concluded between the Commission and Greece pursuant to Article 23(1) of Regulation (EU) 2021/241 (the 'financing agreement').

(85) Council Implementing Decision 10152/21 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 that Implementing Decision should be replaced entirely,

HAS ADOPTED THIS DECISION:

Article 1

Implementing Decision (EU) of 13 July 2021is amended as follows:

(1) Article 1 is replaced by the following:

"*Article 1*

Approval of the assessment of the RRP

The assessment of the modified RRP of Greece on the basis of the criteria provided for in Article 19(3) of Regulation (EU) 2021/241 is approved. The reforms and investment projects under the RRP, the arrangements and timetable for the monitoring and implementation of the RRP, including the relevant milestones and targets and the additional milestones and targets related to the payment of the loan, the relevant indicators relating to the fulfilment of the envisaged milestones and targets, and the arrangements for providing full access by the Commission to the underlying relevant data are set out in the Annex to this Decision.";

(2) In Article 2, paragraphs 1 and 2 are replaced by the following:

"1. The Union shall make available to Greece a financial contribution in the form of non-repayable support amounting to EUR 18 220 378 076[10]. That contribution includes:

(a) an amount of EUR 13 515 279 418 that shall be available to be legally committed by 31 December 2022

(b) an amount of EUR 3 911 428 735 that shall be available to be legally committed from 1 January 2023 until 31 December 2023;

(c) an amount of EUR 768 069 923[11], in accordance with Article 21a(6) of Regulation (EU) 2021/241, exclusively for measures referred to in Article 21c of that Regulation, with the exception of measures referred to in Article 21c (3), point (a);

[10] This amount corresponds to the financial allocation after deduction of the Greece's proportional share of the expenses of Article 6(2) of Regulation (EU) 2021/241, calculated in accordance with the methodology of Article 11 of that Regulation.

[11] This amount corresponds to the financial allocation after deduction of the Greece's proportional share of the expenses of Article 6(2) of Regulation (EU) 2021/241, calculated in accordance with the methodology of Article 11 of that Regulation.

(d) an amount of EUR 25 600 000, transferred from the Brexit Adjustment Reserve to the Facility.

2. The Union financial contribution shall be made available by the Commission to Greece in instalments in accordance with the Annex to this Decision. An amount of EUR 2 310 092 538 shall be made available as pre-financing in accordance with Article 13 of Regulation (EU) 2021/241.

An amount of EUR 158 733 985 shall be made available as pre-financing in accordance with Article 21d of Regulation (EU) 2021/241. That pre-financing may be disbursed by the Commission in up to two payments.

The pre-financing and instalments may be disbursed by the Commission in one or several tranches. The size of the tranches shall be subject to the availability of funding.";

In Article 3, paragraphs 1 and 2 are replaced by the following:

"Article 3
Loan support

1. The Union shall make available to Greece a loan amounting to a maximum of EUR 17 727 538 920, of which up to EUR 5 000 000 of additional loan following the request for loan support of 31 August 2023.

2. The loan support referred to in paragraph 1 shall be made available by the Commission to Greece in instalments in accordance with the Annex to this Decision. An amount of EUR 1 654 580 060 shall be made available as pre-financing in accordance with Article 13 of Regulation (EU) 2021/241. The pre-financing and instalments may be disbursed by the Commission in one or several tranches. The size of the tranches shall be subject to the availability of funding."

(3) The Annex is replaced by the text in the Annex to this Decision:

Article 2
Addressee

This Decision is addressed to Greece.

Done at …,

For the Council
The President