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**LEGISLATIVE ACTS AND OTHER INSTRUMENTS**

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Subject: 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

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## COUNCIL IMPLEMENTING DECISION

of ...

### **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<sup>1</sup>, and in particular Article 20(1) thereof,

Having regard to the proposal from the European Commission,

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<sup>1</sup> OJ L 57, 18.2.2021, p. 17, ELI: <http://data.europa.eu/eli/reg/2021/241/oj>.

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<sup>2</sup> ('the Council Implementing Decision of 13 July 2021'). The Council Implementing Decision of 13 July 2021 was amended by the Council Implementing Decisions of 8 December 2023<sup>3</sup>, 16 July 2024<sup>4</sup>, 21 January 2025<sup>5</sup> and 18 July 2025<sup>6</sup>.
- (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 150 measures.

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<sup>2</sup> See documents ST 10152/21 and ST 10152/21 ADD 1 at <http://register.consilium.europa.eu>.

<sup>3</sup> See documents ST 15831/23 REV 1 and ST 15831/23 ADD 1 REV 1 at <http://register.consilium.europa.eu>.

<sup>4</sup> See documents ST 11858/24, ST 11858/24 COR 1, ST 11858/24 ADD 1 and ST 11858/24 ADD COR 1 at <http://register.consilium.europa.eu>.

<sup>5</sup> See documents ST 17055/24, ST 17055/24 ADD 1 and ST 17055/24 ADD 1 COR 1 at <http://register.consilium.europa.eu>.

<sup>6</sup> See documents ST 11101/25 and ST 11101/25 ADD1 at <http://register.consilium.europa.eu>.

- (4) Greece has explained that eight measures are partially or totally no longer achievable because of unexpected delays related to public procurement procedures. This concerns measures 16285 (Investments in the national irrigation network through PPP schemes), 16851 (Biodiversity protection as a driver for sustainable growth), 16823 (Cybersecurity strategy and policies for the Public Sector & advanced security services for national critical infrastructures), 16827 (Data Governance strategy & policies for the Public Sector), 16934 (Upgrading Vocational Education and Training), 16757 (Establishment of a Radiotherapy Center at the ‘Sotiria’ Thoracic Diseases Hospital of Athens) and 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 eight measures are partially no longer achievable because of lower than expected demand. This concerns measures 16874 (Energy and entrepreneurship), 16706 (Digital Transformation of SMEs), 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), 16584 (Proposals for actions in the Aquaculture Sector), 16626 (Economic transformation on the Agricultural Sector), 16634 (New Industrial Parks), 16931 (Tourism Development) and 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 totally no longer achievable because of supply chain disruptions. This concerns measure 16996 (Installation of energy storage for additional RES penetration). On this basis, Greece has requested that that measure be removed. The Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (7) Greece has explained that five measures are partially or totally no longer achievable because of unforeseen legal issues, including court litigation. This concerns measures 16291 (Digital transformation of the Tax and Customs Administration measure), 16911 (Aerial means for crisis management), 16794 (Strengthening the Apprenticeship System, vocational education and training, and skills) and 16630 (Cretan Northern Highway (B.O.A.K.)). On this basis, Greece has requested that those measures be amended. Furthermore, Greece has requested that measure 16785 (Tourism Registry e-MHTE) be removed. The Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (8) Greece has explained that four measures are partially no longer achievable because of unexpected technical challenges. This concerns measures 16778 (Digitisation of archives and related services), 16793 (Project for the construction of a building dedicated to Cellular & Gene Therapies and Hematology Clinic Laboratories within the General Hospital of Thessaloniki ‘Papanikolaou’), 16904 (Disability) and 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 measures 16872 (Energy renovation on residential buildings), 16873 (Interventions in residential areas and in the building stock), 16401 (Energy Upgrade Programme ‘Upgrade My Home’), 16831 (Produc-E Green), 16924 (Electromobility), 16779 (Interoperability and web services development), 16964 (Next-Generation Interoperability Centre (KED)), 16795 (Health infrastructure), 16755 (Reform of the Primary Health Care System), 16982 (Organisational reform in the railways sector), 16999 (Accessibility Restoration following the devastating effects of storms ‘DANIEL’ and ‘ELIAS’), 16735 (Utilizing ‘arts on prescription’, promoting social cohesion, and tapping on the silver economy), 16989 (Optimisation of land and sea space usage for the development of RES and offshore wind energy development), 16980 (RRP Loan Facility), 16993 (Roadmap for innovative energy efficiency interventions and identification of new financial instrument) and 16995 (Renewable Hydrogen production project). On this basis, Greece has requested that those measures be amended. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

- (10) Greece has explained that 88 measures have been amended to implement better alternatives that allow the administrative burden to be reduced and simplify the implementation of the Council Implementing Decision of 13 July 2021, while still achieving the objectives of those measures. This concerns measures 16870 (Interventions for the electricity interconnection of islands and the upgrading of the electricity network), 16871 (Revitalization actions of the most affected territories (Just transition territories)), 16899 (Installed capacity increase in Hellenic Electricity Distribution Network Operator (HEDNO) HV/MV substations for new RES connection), 16900 (HEDNO overhead network upgrading in forest areas), 16901 (HEDNO network upgrades aiming at enhancing resilience and protecting the environment), 16926 (Support of the installation of storage systems to enhance RES penetration), 16875 (Infrastructure development and buildings' restoration in former royal estate in Tatoi), 16932 (Olympic Athletic Center of Athens), 16894 (Establishment of new special spatial planning framework for renewable energy, industry, and tourism), 16850 (Drinking Water Supply and Saving Infrastructures), 16909 (Establishment of a strategic National Disaster Risk Management), 16910 (Monitoring and Management System), 16912 (Forest firefighting, prevention and response equipment), 16983 (Preliminary inspection of seismic resistance of buildings), 16772 (Waste management law for sustainable landfilling and recycling), 16855 (Small-satellites), 16844 (Transition to 5G technology, facilitating the development of innovative remote services), 16736 (New system for Public Procurements), 16791 (Digital Transformation of the Greek National Tourism Organisation), 16810 (CRM for the General Government), 16742 (Digital transformation of the Ministry of Foreign Affairs), 16782 (Interconnection and interoperability of registries, systems and services for data exchange between national public organisations),

16824 (E-Registries), 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), 16854 (Smart cities), 16842 (Central BI - Data Analytics), 16956 (Expansion of Syzefksis II), 16973 (Establishment of a digital business ecosystem for the facilitation of the SMEs digital transformation), 16922 (Social Integration), 16746 (Reform of Passive Labour Market Policies to Support Transitions to Employment), 16747 (Active Labour Market Policies Reform), 16750 (Digital Transformation of Labour Systems), 16941 (Restructuring and rebranding of DYPA's local branches for the promotion of employment (KPA2)), 16942 (Digital transformation of the public employment service (DYPA)), 16289 (Strategy for Excellence in Universities & Innovation), 16792 (Labor force skilling, reskilling and upskilling through a reformed training model (Vocational Education & Training Reform)), 16913 (A New Strategy for Lifelong Skilling: Modernising and Upgrading Greece's Upskilling and Reskilling System), 16676 (Digital transformation of Education), 16933 (Upgrading Vocational Education and Training), 16816 (Clawback reduction and rationalization of healthcare expenditure), 16753 (Establishment of Home Health Care & Hospital at Home systems), 16984 (Personal doctor reform), 16726 (Social Benefits Optimisation), 16685 (Diversity Awareness), 16402 (Social and Affordable Housing), 16688 (Promote integration of the refugee population), 16763 (Digital transformation of the immigration and asylum system), 16611 (Digital transformation of tax audits), 16643 (Codification and simplification of tax legislation), 16952 (Strengthening the national anti-corruption framework), 16701 (Enhance State-aid network),

16703 (Combating illegal trade and protecting intellectual property), 16972 (Reforming Public Administration), 16974 (Accounting Reform), 16705 (Transformation of Fiscal Management and Supervision in Governance), 16940 (Modernise the Hellenic Consignment Deposit and Loans Fund), 16986 (Completion of the national cadastre), 16292 (New Judicial buildings and renovations), 16727 (Digital Transformation of Justice (E-Justice)), 16575 (Accelerating the administration of justice), 16581 (Enhanced capital market supervision and trustworthiness), 16957 (Strengthening the capacity of the financial system to overcome legacy challenges and finance the real economy), 16580 (Upgrade of the digital infrastructure necessary for the implementation of the new unified insolvency framework for the restructuring of debt and second chance), 16618 (Basic & Applied Research), 16624 (Creation-Expansion-Upgrade of Infrastructures of Research Centers supervised by the General Secretariat for Research and Innovation (GSRI)), 16654 (TH<sup>2</sup>ORAX: Trellis Holistic & Hybrid Operational Ruggedized Autonomous eXemplary system), 16971 (Research - Create – Innovate), 16622 (HORIZON 2020 ‘Seal of Excellence’: financing top innovative companies), 16628 (Central Greece Highway E-65: Trikala-Egnatia Section), 16892 (Upgrading suburban railway of West Attica), 16833 (Implementation of airport safety works), 16959 (Digital Transformation of the Hellenic Railways), 16786 (Simplification of the Procedures of the Ministry of Infrastructure & Transport), 16293 (Culture as a driver of growth), 16433 (Protection of cultural monuments and archaeological sites from climate change), 16721 (Acceleration of smart manufacturing), 16725 (Upgrading higher arts education), 16485 (Cultural Routes at Emblematic Archaeological Sites and Monuments),

16435 (Restoration – Conservation – Enhancement of the Acropolis Monuments), 16921 (Reskilling and Upskilling in Tourism), 16937 (Digital Integrated Program Management System for the Administration of the Technical Works and Structural Assets of the Ministry of Infrastructure and Transport), 16975 (Upgrade Interventions for Regional Ports), 16944 (Master plan for the renewal of the Greek passenger shipping fleet), 16543 (Actions for the simplification of the business environment and its upgrading in quality and safety), 16988 (Regulatory and market operation framework for carbon capture, usage, and storage technologies to foster industry decarbonization), 16990 (Grid and storage capacity – fostering of storage investments), 16991 (Regulatory framework towards a smart grid) and 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 17 measures be increased. This concerns measures 16879 (Preparation of Urban Plans in implementation of the urban policy reform), 16846 (Urban Wastewater and Sludge Management Infrastructures from Wastewater Treatment), 16849 (National Reforestation Plan and Parnitha flagship investment), 16955 (Upgrade of Cloud computing infrastructure and services of the National Infrastructures for Research and Technology (GRNET)), 16949 (Smart Bridges), 16818 (Fiber optic infrastructure in buildings), 16780 (Further Modernisation of Public Administration’s One-Stop Shops), 16929 (Towards Public Administration’s ‘customer’-oriented services through simplification and improvement of processes, systems enhancements and compliance with European strategies and policies), 16756 (Organizational Reforms in the Health System), 16752 (Digital Transformation of Health (DigHealth)), 16783 (Implementation of the National Public Health Prevention Program ‘Spiros Doxiadis’ (NPP”SD”)), 16486 (Museum of underwater antiquities), 16631 (Road Safety Upgrade), 16653 (Digital Transformation of the Agri-Food Sector), 16536 (Upgrade of infrastructure, renewal of equipment and upgrade of quality of services provided by HOCRED Stores – former ARF Stores (On-spot and electronic)), 16994 (Energy Efficiency and promotion of RES for auto-consumption) and 16960 (Smart Infrastructure with environmental and cultural focus). Furthermore, Greece has requested that three new measures be added. This concerns measures 16403 (Repayable Capital Injection into the Hellenic Development Bank), 16405 (Pillar assessment of the Hellenic Development Bank) and 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 criterion 2.4 of Annex V to, Regulation (EU) 2021/241, the amended RRP is expected to ensure that no measure (rating A) for the implementation of reforms and investment 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<sup>7</sup> (the principle of 'do no significant harm').

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<sup>7</sup> 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: <http://data.europa.eu/eli/reg/2020/852/oj>).

- (15) The amended RRP assesses compliance with the ‘do no significant harm’ principle following the methodology set out in the Commission Notice ‘Technical guidance on the application of ‘do no significant harm’ under the Recovery and Resilience Facility Regulation’<sup>8</sup>. 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 that 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 criterion 2.5 of Annex V 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 from it. 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 estimated total cost 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.

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<sup>8</sup> OJ C 58, 18.2.2021, p. 1.

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

***Contribution to the digital transition***

- (18) In accordance with Article 19(3), point (f), of, and criterion 2.6 of Annex V 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 Regulation (EU) 2021/241.
- (19) The measures in the amended RRP continue to contribute to the digital transition or to help 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.

### ***Costing***

- (20) In accordance with Article 19(3), point (i), of, and criterion 2.9 of Annex V 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 with 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 cost of the RRP is in line with the principle of cost efficiency and commensurate with the expected national economic and social impact.

### ***Any other assessment criteria***

- (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 of 13 July 2021 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), of Regulation (EU) 2021/241.

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

- (23) In accordance with Article 4(4) of Regulation (EU) 2024/795 of the European Parliament and of the Council<sup>9</sup>, Greece considered as priority projects those projects that have been awarded a Sovereignty Seal pursuant to Article 4(1) of that Regulation. However, Greece considered that no such projects were 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.

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<sup>9</sup> 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>).

### ***Financial contribution***

- (25) The estimated total cost 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 determined in accordance with Article 4a of Regulation (EU) 2021/1755 of the European Parliament and of the Council<sup>10</sup> 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 of 13 July 2021 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.

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<sup>10</sup> 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>).

- (28) This Decision is without prejudice to the outcome of any procedures relating to the award of Union funds under any Union programme other than the Recovery and Resilience 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 amended recovery and resilience plan*

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

*Article 2*

*Amendments*

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 appearing in the Annex to this Decision.

*Article 3*

*Addressee*

This Decision is addressed to the Hellenic Republic.

Done at ..., ...

*For the Council*

*The President*

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