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NOTE

From:	Greek Delegation
To:	Delegations
Subject:	8th Round of Mutual Evaluations - 'The practical implementation and operation of European policies on preventing and combating Environmental Crime' Follow-up to the Report on Greece

As a follow-up to each Round of Mutual evaluations, each Member State is requested to inform the General Secretariat of the Council of the actions it has taken on the recommendations given to it.

A follow-up report should be submitted within 18 months from the adoption of the evaluation report concerned.

Delegations will find in the Annex the follow-up report of Greece regarding the recommendations that were made in the report ST 14588/1/18 REV1 for the Eighth Round of Mutual Evaluations.

**EIGHTH ROUND OF MUTUAL EVALUATIONS ON 'THE PRACTICAL
IMPLEMENTATION AND OPERATION OF EUROPEAN POLICIES ON
PREVENTING AND COMBATING ENVIRONMENTAL CRIME'**

FOLLOW-UP TO REPORT ON GREECE

In the context of the eighth round of Mutual Evaluations on 'the practical implementation and operation of the European policies on preventing and combating environmental crime'

The evaluation report on Greece as set out in doc. 14588/1/18, was adopted by the LEWP/COPEN WP on **13th December 2018**.

We hereby submit, according to the procedures set out in doc. 15538/4/15, our report on the follow-up to the recommendations made to Greece in the above evaluation report.

Recommendation n. 1. Work on the establishment of a national strategy defining the objectives in the fight against environmental crime and the roles of the relevant bodies involved in that fight (see 3.1 and 3.6 of the report).

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

The Ministry of Environment and Energy, aiming the development of a National Strategy for Combating Environmental Crime, participates as a Coordinating Beneficiary in the LIFEPROWhIBIT project "Prevention of Environmental Crime by 'Intelligent' Inspections - Prevent of Waste Crime by Intelligence Based Inspections". Two other partners, the Green Fund and the European IMPEL Network, are also involved in the project. LIFEPROWhIBIT aims to prevent, detect and deter environmental crime in the waste management sector. The participation of both institutional and civil society actors and business associations is crucial for the implementation of the project.

A cornerstone of the abovementioned project is the establishment of a committee to oversee and coordinate the implementation of the national strategy. The National Strategy aims to set the objectives in the field of combating environmental waste crime and to define the roles of the relevant actors, both institutional and civil society and business associations, involved in this effort. To this end, a Draft National Strategy has been prepared and will be submitted for consultation to the Interim Committee of the project.

In this context, relevant Memoranda of Understanding have been signed with the following stakeholders:

- General Secretariat for Waste Management Coordination.
- Hellenic Recycling Corporation (HRC)
- Hellenic Police
- Greek Customs
- General Directorate of the Financial Crime Squad

- Coast Guard
- Decentralised Administration and Regions
- National Transparency Authority
- Judicial and Prosecutorial Authorities
- Ombudsman of the Citizen

- NGOs: Hellenic Solid Waste Management Company, Association of Industries and Enterprises for Recycling and Energy Recovery of Waste.

Taking into account the objective of the National Strategy and having in mind the existing gaps and problems as well as necessities of the country in this sector, the following 4 pillars of the National Strategy are formed:

- Governance to prevent and combat environmental crime
 - Central Coordination of Actions, defining the roles of relevant actors and assessing new risks or changes to existing risks.
 - Strengthening Cooperation of Stakeholders and Strengthening Skills of Stakeholders
 - Awareness raising and involvement of stakeholders
- Implementation of Corporate Social Responsibility and Responsible Entrepreneurship in all sectors of economic activity.
- A framework for cooperation between the state, civil society and the market to build strong relationships to combat environmental crime.
- Adoption of Best Practices - Following international standards

At the same time, the individual actions of each axis through which the National Strategy will be implemented are defined in the draft Action Plan which has also been drafted and will be discussed at the next meeting of the Interim Project Committee. After piloting the National Strategy and Action Plan during the project, the ultimate goal is to have the National Strategy formally adopted through a Joint Ministerial Decision.

Greek Police

The HQ of the Greek Police has prepared a Counter-Crime Policy Program for the period 2020-2024, following the same Program for 2015-2019, which defines the strategic priorities of the Greek Police. These priorities are related to the public security, state security, migration and protection of people, road safety and crisis management. Additionally, they are aligned with those of the European Union. In particular, as regards public security issues, the protection of the environment has been made a priority for the Hellenic Police Services, with the aim, among other things, of combating illegal waste trafficking. In this context, specific actions have been defined, including the intensification of controls of all kinds (checks on businesses, roads, etc.), increased cooperation with national and international bodies (e.g. cooperation with national and international agencies: environmental inspectors, enforcement authorities, use of communication channels with EU Member States and third countries), use of special investigative techniques to dismantle criminal organisations, and training and awareness-raising of police staff.

Recommendation n. 2. To designate, at national level, a single body in charge of coordinating the efforts conducted by all authorities involved in the fight against environmental crime so as to achieve more effective cooperation among them; (see 3.1, 3.6, 4.4.1 and 4.6 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

LIFE PROWhIBIT will establish, at national level, a coordinating body, competent to define the roles of all involving actors, as well as to coordinate their actions. By this means, a more effective cooperation shall be reached, resulting in elimination of possible administrative malfunctions.

The above mentioned body bears the responsibility to timely and officially inform all competent, pursuant to the statutory framework of cooperation, law enforcement authorities, in every arising case of environmental crime. It is also invested with the power to invite for joint inspections, whenever appropriate, as well as to define the role and competence of all participating inspecting agencies, even by proposing amendments to existing relevant regulation.

Further more, agents involved in the fight against environmental waste crime have or and have access to information systems and databases. By having access to these, the coordinating body will be able to immediately inform every agent carrying out an inspection with all necessary information. This will facilitate the identification of any links between environmental crime cases and organised crime, and strengthen cooperation between the bodies involved.

Recommendation n. 3. Enhance the collection of comprehensive statistics in order to obtain an integrated and overall picture of the phenomenon of environmental crime and to follow the development of cases at all stages of the proceedings, be they criminal or administrative (see 3.3.2 and 3.6 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

A. Article 4 of Law 4442/2016 established the Integrated Information System for the Exercise of Activities and Controls (IISEAC). The IISEAC will include, inter alia, the audits to which an activity entity has been subjected, as well as the level of risk to the public interest.

One of the sub-systems of the IISEAC will be the Audit Management Subsystem which will allow for the automation of the planning of audits, based on a public interest risk analysis and the recording of the results of each audit carried out using standard audit sheets. The IISEAC will be accessible and usable by all authorities involved. The IISEAC will provide information on the content of the audits carried out by each audit authority and will allow for an interface with the stakeholders to submit queries on the requirements of the legislation. Information resulting from the audits will also be disclosed, as well as any findings and findings relating to the competence of other bodies.

It will also provide for the exchange of data between the IISEAC and the General Commercial Register (GCR) as well as between the services of the General Secretariat for Public Revenue and the General Secretariat for Information Systems and Administrative Support of the Ministry of Finance. Additionally, interoperability and electronic data exchange with existing databases, as well as with any other existing information system, is foreseen under the eGovernment Service Provision Framework.

B. Moreover, in the context of LIFE PROWhIBIT, the role of the Coordinator at central level, as defined in Pillar 1 of the National Strategy, will include the collection of broad and valid statistical data in order to form a comprehensive and overall picture of the phenomenon of environmental crime and to be able to monitor the development of cases, criminal or administrative, at all stages of the procedure. This will help to understand national trends in the field of environmental crime, the practices used, its correlation with other forms of crime and, ultimately, to deal with it more effectively. At the same time, through Pillar 1 of the National Strategy: Strengthening Stakeholder Cooperation, there will be a coordinated information and monitoring of the progress of the findings of the controls. In this way, the possibility of extracting valid statistics on environmental waste crime in the country will be demonstrated. Also, in the case of a complaint by a citizen, there will be comprehensive information as to the status of the complaint in question and the correct information of the complainant by the control body that will take over the control of the complaint.

Hellenic Recycling Agency (HRA)

A. The recording of complaints, investigations, inspections/audits and fines is held by the Hellenic Recycling Agency (HRA), without being communicated to any other body.

B. The Hellenic Recycling Agency (HRA), pursuant its competence, shall ensure the organization and maintenance of the National Register of Producers (NRP) in which all producers of packaging and other similar products are compulsorily registered. Registration of producers in the register is a prerequisite for the legal exercise of their activity and for their participation in public tenders.

More specifically, the register is an operational tool for the systematic monitoring of compliance by producers of packaging and other products with the requirements of the legislation on alternative management of these products. In particular, the National Register of Producers (NRP) aims to:

- a) the collection and evaluation of information on the quantities and types of packaging and other products placed on the Greek market,
- (b) to establish a link for the exchange of information with the national registers of producers of other Member States of the European Union,
- (c) the dissemination of information, in particular to users/consumers as well as to any interested private or public agent.

Publicity of the archives of registered producers to any interested private or public sector is prescribed for the National Register of Producers (EMPA). The National Register of Producers (EMPA) is also authorized to notify reports of the non compliant to the obligation of registration producers, as well as of the contracts terminated by the Collective Schemes of Alternative Management.

Pursuant to article 15 of Law 4819/2021 (Government Gazette 129/A/23.07.2021) – Interconnection with the National Register of Producers and other registers (Article 8a of Directive 2008/98/EC, as added by paragraph 9 of EU Directive 2018/851), two important points of cooperation between operators are provided for:

- Hellenic Recycling Agency (HRA) National Register of Producers - Gen. General Secretariat of Commerce - GEMI

In accordance with the provisions of Article 91 of Law No. 4635/2019 (A' 167) and Article 11 of Decision No. 181504/2016 (B' 2454) of the Deputy Minister of Environment and Energy, as amended, GEMI and National Register of Producers (NRP) interoperate for the exchange and cross-checking of data through the Interoperability Centre of the General Secretariat of Public Administration Information Systems of the Ministry of Digital Governance, in compliance with the provisions on the protection of personal data and commercial confidentiality, Article 47 of Law No. 4623/2019 (A' 134) and Article 84 of Law No. 4727/2020 (A' 184).

- Hellenic Recycling Agency - National Register of Producers (HRA-NRP) Ministry of Transport -
MOTOR VEHICLES REGISTER

Part 2. 3 of Article 51 of Law No. 51. 4784/2021 (A' 40) is the existence of an EMPA registration number.

In addition, in par. 3 specifies the interoperability of the GEMI with the EMPA, based on a ministerial decision to be issued.

C. Hellenic Recycling Agency (HRA) participates in the LIFE PROWhIBIT project "Prevention of Waste Crime by Intelligence Based Inspections" with the Ministry of Environment as coordinator and the participation of two other partners, the Green Fund and the IMPEL network. The objectives of the project are as follows:

- Development and implementation of a National Strategy for the Prevention and Combating of Environmental Crime in Waste Management.
- Increase the capacity of the competent bodies and harmonise cooperation between them.
- Strengthen the capacity of the institutions, intensify cooperation between agencies, inspections and the implementation of repressive measures.
- Develop innovative information systems and databases from existing and new inspections on Environmental Crime in Waste Management, with a view to developing "Smart" methods of inspection and enforcement of existing legislation.
- Improve communication and knowledge transfer between stakeholders on Environmental Crime.
- Promote environmental governance by broadening the participation of stakeholders.
- Establish guidelines and guidelines for preventing and combating environmental crime related to waste management at EU level.

The Hellenic Recycling Agency (HRA) is involved in the actions:

- A) Participation in the Project Steering Committee (PSC) which is also the Provisional Coordination Committee for Environmental Crime in Waste Management. This committee will participate in the development of a national strategy and action plan to address environmental crime in waste management. The members of the committee will meet at least every 8 months and the role and rules governing the operation of the committee are set out in the Provisional Coordination Committee's Operational Report.
- B) Adoption and adoption of the Provisional Coordination Committee Operational Report at the second meeting of the Project Steering Committee.
- C) Attendance of training seminars and the conference, which are key activities of the project.
- D) Participation in inspections to combat environmental crime in waste management.

The results of the programme are expected to improve in many respects the assessment of our country in terms of the practical implementation and operation of European policies to prevent and combat environmental crime."

The Hellenic Recycling Agency (HRA) is a founding member and participates in the European WEEE Enforcement Network (EWEN), which is a network created under the IMPEL platform and in which the authorities with competence to sanction producers of WEEE participate. In addition, in 2019 Hellenic Recycling Agency (HRA) participated in EMPACT (European Multidisciplinary Platform Against Criminal threats) in Operational Action 2.3 "Illegal Trafficking and Irregular Management of Waste from batteries/accumulators at the end of their life cycle".

Greek Coast Guard

The European Commission invites the competent administrations of the Member States (MS) to submit, on a voluntary basis, within the month of March on an annual basis starting from the year 2020, data on existing pollution incidents and their further administrative/criminal management by the MS. These data, recorded in a harmonized reporting format for all MS, are requested in the framework of Directive 2005/35/EC on "ship-source pollution and on the introduction of penalties, including criminal sanctions, for pollution offences", which was transposed into Greek national order by Law No. 4037/2012 (A' 10).

Recommendation n. 4. Enhance the capacity of the prosecution service to fight environmental crime by designating specialised prosecutors at regional level, and designate a senior prosecutor at central level with the coordinating powers to address cross-regional experience and disseminate knowledge of procedural matters in environmental cases; (see 4.1 and 4.6 of the report)

Non Applicable (NA)

Recommendation n. 5. Consider enhancing the number of environmental inspectors in the Special Inspection Secretariat of the Inspectorate of the Ministry of Environment and Energy and building up the structure of inspectorates at regional level, ensuring that staff have the necessary skills needed to carry out inspections in a more effective way; (see 4.2.1 and 4.6 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

The total number of environmental inspectors in the General Directorate of Inspectors and Auditors of the Ministry of Environment (as it is now called), and specifically the Environmental Inspectorates, has increased from 17 in 2019 to 25 in 2022.

In recent years, through the “mobility” law , the opportunity has been given to transfer new inspectors to the Service with multiple benefits as expected, as the mobility process with the interview stage enables the selection of the most suitable staff with the required experience in environmental matters. As stated in paragraph 4.6 of the Evaluation Report: 'The inspectors working in the Special Secretariat for Environment and Energy Inspection (SSEI) have an extremely high level of training, the necessary expertise in different areas (forests, waste, biodiversity) and a very high degree of commitment to their work'.

It should be noted that the Special Secretariat for Environment and Energy Inspection (SSEI) as mentioned in the Evaluation Report did not exist in the Ministry of Environment and Energy, apparently this is a clerical error in the report instead of the correct "Special Secretariat for Inspectors and Auditors of the Ministry of Environment and Energy".

At the same time, the PD on private environmental auditors is also expected, which, once passed, is expected to sharply increase the number of environmental inspections.

Hellenic Recycling Agency (HRA)

The Inspections & Audits Division of HRA was staffed in 10th 2018 with two persons. 'To date, the head of the Division has changed 4 times, as well as the staff. The legislation governing the inspections under the jurisdiction of HRA is contained in Law 4819/2021 and Law 4736/2020 on the restriction, elimination, labelling of single-use plastic products. In the same laws, the criminal and administrative sanctions of violators are separately provided for.

An Inspection Manual approved by the Board of Directors of HRA has been issued (Board Decision 163.3/14.2.2020) with the latest version 2/2020 posted on the Agency's website. A Methodology for the Determination of Administrative Fines approved by the Board of Directors of the HRA was also issued by Board Resolution 115.4/26.4.2018, which is no longer in force following the adoption of Law 4819/2021. In this regard, Law 4819/2021 provides for the issuance of a Presidential Decree upon the recommendation of the HRA pursuant to Article 69(16).

The HRA is processing the recommendation for the adoption of the new methodology. In addition, the Ministerial Decision of the Ministry of Environment and Energy 51775/1521 on the determination of administrative sanctions for local administrators offenders (Government Gazette 2218/B/8.6.2019) needs to be amended in accordance with Article 91(1) of Law 4819/2021.

The HRA prepares an annual regular inspection programme upon the recommendation of the Inspections and Audits Directorate and after approval by the Board of Directors of the Agency, the programme is posted on the Agency's website. In the last two years, due to the coronavirus and the lack of staff, it has not been possible to comply with the inspection programme.

For the period 2018-2021, 5 audits were carried out on alternative management bodies of EMPAs, 13 on points of sale for the plastic carrier bag, over 40 compliance letters have been sent and administrative sanctions have been imposed (on 2 EMPAs, 4 waste producers, 8 supermarkets, 113 producers for late registration in the National Registry of Producers (NRP) which were not posted on DIAGIA. Also complaint investigations are daily in all waste streams. There are also pending control orders which in their final phase require the calculation of administrative sanctions due to the change in the legislative framework.

Recommendation n. 6. Improve the capacity of the police to fight environmental crime, in particular by providing trained and specialised staff at regional level (see 4.2.1 and 4.6 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

The Environmental Inspectorate of Ministry of Environment and Energy is constantly in close cooperation with the local police stations, as well as with the Environmental Protection Department of the Athens and Thessaloniki Security Directorate, and assists directly whenever requested with joint autopsies.

In fact, in the framework of a memorandum of cooperation signed between the Greek Police and the General Directorate of Natural Environment and Water (through the LIFE PROWhIBIT program "Prevention of environmental crime with Smart Inspections) to combat environmental crime, it has been proposed to design and implement seminars by the Environmental Inspectors for police officers, in order to train them in environmental legislation and especially in the detection of criminal acts causing pollution/degradation of the environment. At the same time, within the framework of the above mentioned Memorandum, the implementation of joint targeted environmental inspections by the Environmental Inspectors and the Police in activities related to waste management is planned. A joint environmental inspection has already been carried out between the Environmental Inspectorate of Southern Greece and the Environmental Police Department of the General Police Department of Athens.

The Coordination Office for Environmental Liability (COEL)

The Ministry of Environment (COEL) as a co-beneficiary of the LIFE NATURA THEMIS project organized two training seminars on 9 and 10 April 2019. The first one was for Judges and Prosecutors in Heraklion, Crete. The second seminar was addressed to public officials (inspectors, customs and port officials, forestry officials) which was also held in Heraklion, Crete.

Also in the framework of the above project (LIFE NATURA THEMIS), on 3 and 4 December 2019, two additional training seminars were organized in Athens. The first one was addressed to lawyers and public officials and the second one was addressed to judges and prosecutors.

These seminars were aimed at enabling participants to receive education/training with specialized presentations by distinguished scientists and experts on:

- Improve capacities regarding the recognition of wildlife crime as a distinct prosecution case,
- the correct and effective application of European and national law and Directive 2004/35/EC on environmental liability in the context of biodiversity conservation,

- enhancing training/skills for the successful prosecution of biodiversity offenders,
- the exchange of knowledge and experience.

Participants in the seminars:

1. Judges - Prosecutors (Heraklion) 10/4/2019: 42 participants.
2. 2. public officials (Heraklion) 11/4/2019: 75 participants
3. Lawyers/public officials (Athens) 3/12/2019: 60 participants
4. Judges - Prosecutors (Athens) 4/12/2019: 42 participants

Greek Police

The Greek Police Headquarters has initiated a process of implementing e-learning, in cooperation with the Greek Police School of Further Education and Training and the Sub-Divisions for the Protection of Property Rights, Cultural Heritage and Environmental Security of Attica and Thessaloniki, for the purpose of creating an adequate network of staff and providing them with further information on issues of illegal distribution, storage and dispersal of waste, as well as environmental pollution. This training, as planned so far, will involve some three hundred and fifty (350) people from security services throughout the country, with a start date scheduled in the beginning of March this year. In addition, the competent Environmental Protection Departments of the Attica and Thessaloniki Security Directorates have been reinforced over the last year with important equipment to improve their effectiveness.

Recommendation n. 7. Increase the focus on education and training of judges in the field of environmental crime; (see 4.5 and 4.6 of the report)

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Recommendation n. 8. Enhance training of all practitioners involved in the fight against environmental crime (law enforcement agencies, inspectors, customs, port and prosecutors); (see 4.5 and 4.6 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

A. One of the LIFE actions is to strengthen the skills of stakeholders, namely by the organisation and delivery of specially designed seminars and workshops on a systematic basis. These training materials will be adapted and focused on the needs of each actor and will be available after the seminar. In particular, it is envisaged that seminars will be held in three thematic modules:

- Seminar A: Environmental Crime: Legislative Framework and National Strategy/Learning from Case Studies.
- Seminar B: Environmental Networks and Non-Governmental Organizations (NGOs) in the Fight against Environmental Crime.
- Seminar C: Specific Skills/Tools for Dealing with Environmental Waste Crime

In addition, it is planned to train the Environmental Inspectors on the use of satellite imagery, supply drones and train the staff of the Inspectorate Corps accordingly so that they can use them to conduct inspections. Finally, legal advice will be provided on the legality of the use of data from drones and satellite images and how they can be made legal, both in terms of conducting environmental inspections and their subsequent use as evidence to substantiate violations of environmental legislation.

B. The Environmental Inspectors participate in the training seminars of the National Centre for Public Administration and Local Government (NCPALG) and with the cooperation of the two, specialized seminars are designed and implemented that meet exclusively the needs not only of the Environmental Inspectors, but also of all the staff of the Public Services of the Regions and the Decentralized Administrations with the responsibility of conducting Environmental Inspections, as well as of the Municipalities or other entities involved in any way in the operation of environmental infrastructures and systems. In fact, it should be mentioned that Environmental Inspectors participate both in the design and drafting of the relevant training programmes and in the training stage as lecturers. In addition, the Inspectors are informed about current European projects and are invited to participate in meetings and contribute with their own presentations, as recently in the LIFEPROWhIBIT project coordinated by the Ministry of Environment and Energy, which aims to combat Environmental Waste Crime.

In the context of the dissemination of experience acquired by the operation of the Environmental inspectorate of Northern Greece and the training of the staff of other agencies competent to environmental inspections, Decentralised Administrations of Macedonia-Thrace and Thessaly have organized three training meetings on the procedure of environmental inspections and the preparation of the Environmental Inspection Plan. Also, in early 2020, Regions and Decentralized Administrations have organized a workshop (with the participation of a large number of inspection agencies), in order to establish channels of cooperation – communication between agencies pursuant to Article 20 of Law 4014/2011, about the preparation of a comprehensive and applicable Regular Environmental Inspections Program.

In this context and by the chance of the amendment (by the Law 4845/2021) of the institutional framework for conducting Environmental Inspections, a series of informative meetings of between the Environmental Inspectors and the environmental agencies of the Decentralized Administrations and Regions of the country is scheduled, in order to improve acquaintance of the new legislation and provide guidelines on its implementation.

Our Service shares the view and willingness of extending the abovementioned actions to numerous services and agencies, such as customs officers, port officials and those involved in the fight against environmental crime.

Finally, environmental inspectors occasionally attend various webinars organised by IMPEL, STRIKE etc.

The Coordination Office for Environmental Liability (COEL)

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Hellenic Recycling Agency (HRA)

In addition to HRA's participation in the LIFE PROWhIBIT project seminars for staff involved in inspections and audits, it intends to train them further with specialized seminars.

FOTA (Fiscal and Customs Academy of the Hellenic Revenue Service)

Seminars held by the FOTA (Fiscal and Customs Academy of the Hellenic Revenue Service), contain a generic reference to environmental crime, in the context of application of EU and national custom legislation on prohibitions and restrictions on the import/export of goods. It is noted that the legal and consequently the control scope of prohibitions and restrictions is very broad and extends to areas such as counterfeit goods, weapons, explosives, etc.

Greek Police

The training of the personnel of the Greek Police is directed by the Directorate of Training and Human Resources Development of the Head of the Greek Police and is carried out by the respective Schools of the Police Academy, both at basic and post-graduate level.

At a basic level, at the School of Greek Police Officers, the subject 'transport of toxic and dangerous goods' is taught to first-year Cadet Police Officers in the context of the course 'Traffic Police'. In addition, since the current school year, volunteering has been included in the educational process of this School as a separate subject. In particular, theoretical training will be reinforced on human subjects such as animal welfare and environmental protection, with further practical participation of students in related activities, as soon as the covid-19 health protocols allow.

Lectures on related subjects are held at the School of National Security (graduate level). Indicatively, for the current year (25th educational series), a lecture on "Climate crisis: international and European cooperation" was approved and delivered on 01-02-2022, and a lecture on "Climate Neutrality and Greece: Challenges and Opportunities", while a lecture on "International Energy Law" is planned to take place in the coming year.

Officers of the Greek Police actively participate in seminars of related content, conducted by the European Police Academy - CEPOL, as well as in similar webinars. Indicatively:

- i. On 07-05-2019, sixty (60) members of the Hellenic Police Force attended a Webinar (30/2019) on the subject of "Domestic Police Investigations in Environmental Crime".
- ii. On 19-22/11/2019, three (3) members of the Greek Police participated in a CEPOL seminar (10/2019) on "Environmental Crime".

Recommendation n. 9. Improve the awareness of all practitioners involved in the fight against environmental crime so that they attribute sufficient importance to this form of criminal activity (see 4.5 and 4.6 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

In the framework of the project implementation, we have signed Memoranda of Understanding (MoUs) with actors involved in the fight against environmental waste crime. At the same time, during the project, individual workshops will be organised in 13 regions of the country in order to raise awareness and contribution of the relevant stakeholders and citizens at local level. Three of them have already been implemented. In addition, the seminars to be organised will also contribute to raising awareness among professionals. Finally, through the project's website and socialmedia pages, we present actions and news in the field of environmental crime, with a focus mainly on environmental waste crime.

Greek Police

Implementation of the LIFE PROWhIBIT project 'Prevention of Environmental Crime by Intelligence Based Inspections', Signed on 05-06-2021 by the Secretary General for Environment and Water/Water/Sanitary Secretary and the Chief of the Hellenic Police Force: In this particular project, with a total duration of 48 months (starting 10/2019), the Hellenic Police, through its competent services, will support its objectives, focusing on enhancing the effectiveness of the fight against environmental crime in waste management, through the concerted action of the agencies involved, with the creation of a competent Committee and the establishment of a National Strategy for the fight against environmental crime.

The Environmental Protection Department of the Attica Security Directorate has been designated as the contact point for the Greek Police. In addition, the Head of Department and the Deputy Head of Department of the Environmental Protection Department of the Security Directorate of Thessaloniki, in the context of cooperation with the relevant services and bodies, are participating in the European research project called 'PathoCERT'. This project is funded by the European Union and aims to strengthen the capacity and cooperation of associated services and first responders, and other forces in the organisational chain to respond to and manage emergencies events in relation to the dispersion of untreated effluents in the water supply pipelines for the water supply of Thessaloniki and the development of water-related micro-organisms.

Recommendation n. 10. Consider clarifying the distinction between administrative and criminal violations so that there is no doubt as to as to the seriousness of environmental crime; (see 5.1.1, 5.1.3 and 5.5 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

In October 2021 with the adoption of Law 4843/21 the legislation on environmental inspections was amended. In particular, the procedure for conducting them (as provided for in Articles 20 of Law 4014/11, 30 of Law 1650/86 and 9 of Law 2947/21) was amended so that, as a general rule, audits are aimed at improving environmental management and compliance.

The new legislation distinguishes between infringements concerning

- established pollution/degradation of the environment,
- risk of pollution/degradation

- administrative infringements (relating to shortcomings in authorisations, reporting or information documents relating to environmental protection),

while each category of infringement is categorised in terms of its severity as "LOW", "MEDIUM", "SIGNIFICANT" and "VERY SIGNIFICANT". The measures and penalties to be imposed according to the gravity of the infringement should, in accordance with paragraph 1, be more severe than the penalties provided for in paragraph 2. 1 of Article 30 of Law 1650/86 should be proportionate and reasonable and based on an assessment of the risk that the infringement entails for the protection of the public interest. The measures and penalties shall be imposed, depending on the seriousness of the infringement, its frequency or duration, recidivism and compliance history, the behaviour and degree of cooperation of the economic operator subject to control, the amount by which the statutory emission limits have been exceeded and the breach of environmental conditions and standards of environmental commitments, reasons of public interest, as well as any mitigating or aggravating factors, including the direct or indirect profit that the infringement has brought to the operator, the level of the infringement, the level of the infringement and the level of the penalties.

There is also provision for compliance in cases of established infringements, in accordance with a Corrective Action Plan. Where infringements of significant or very significant gravity or low or moderate gravity are found, for which no compliance is found, an Act of Confirmation of Infringement is drawn up and forwarded to the competent prosecuting authority, subject to criminal sanctions.

In order to achieve the above, provision has been made for the introduction of a specific procedural model for environmental audits, called the Compliance Action Model (ACM). This is an innovative tool of the new institutional framework for supervision, introduced in the Greek legislation by article 149 of Law 4512/2018. According to para. 21 of article 50 of Law 4843/21 provides for the issuance of a relevant Ministerial Decision. A relevant draft of the Ministerial Decision has already been prepared by a working group of the Inspection Bodies of Southern and Northern Greece.

The Model Compliance Action Plan (MCA) will define the procedures and implementation details of the new legal framework for environmental inspections. The inspectors/inspectors in environmental inspections will use the Compliance Action Model (CAM) and on the basis of the non-compliances and environmental infringements found will impose the appropriate measures and sanctions, which are provided for in Article 30 of Law 1650/86, as amended by Article 75 of Law 4843/21.

From the above it is clear that the changes in the legal framework for conducting environmental inspections are intended to distinguish between infringements of environmental legislation and to better assess the consequences they may have in order to reduce as far as possible the uncertainties related to the commission of environmental crimes.

Hellenic Recycling Agency (HRA)

In the methodology for determining administrative sanctions that is currently being developed, the following criteria will be taken into account

- compliance or non-compliance with the instructions of the competent bodies after the infringement has been established,
- the benefit derived by the offender from the infringement, the degree of culpability,
- the financial standing of the offender. Also in case of timely compliance the fine will be reduced by up to 30%.

Recommendation n. 11. Complete the implementation of Framework Decision 2009/948/JHA on the prevention and settlement of conflicts of jurisdiction (see 5.4.2 and 5.5 of the report)

NA

Recommendation n. 12. Consider how to increase the use of intelligence-derived information and make wider use of special investigation and economic research techniques to identify any links with organised crime in the context of environmental crime. All the possibilities offered by Frontex should be explored; (see 4.2.2, 7.1.2 and 7.3 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

Under Pillar 1 of the National Strategy: Central Coordination of Actions, as mentioned earlier, it is foreseen to appoint a Coordinator of all relevant actors at central level. It is proposed that, on the recommendation of the Coordinator, tools used in the fight against organised crime may also be used by other law enforcement authorities with competence in environmental crime. A typical example is the surveillance, seizures and asset forfeiture used in the fight against economic crime. In order to achieve such cooperation at the level of sharing information systems and control tools, it is necessary to make legislative amendments defining the broader framework for cooperation. Having established such an information exchange network at national level, cooperation and exchange of information with international authorities such as Frontex or Europol, as well as with the competent authorities of other countries, will be enhanced.

In addition, the Director of the Southern Hellenic Inspectorate is the national representative of EMPACT for Environmental Crime and the country participates in several of the actions of the programme.

INDICATIVE: Operational Action 1.1 ISF-Ambitus, focuses on the definition of a methodological framework for the collection of data from Member States and third countries in order to assess the impact of environmental crime related to waste and wildlife on its territory which includes the assessment of the impact of environmental crime within the EU. As part of the action, we participated in an online workshop organised in March 2021. The aim of the workshop was to refine the information on the action on environmental crime in our country, following our response to a questionnaire on the above action, sent to Ambitus project managers at an earlier time, at their request.

Hellenic Recycling Agency (HRA)

In the current provisions, in order to achieve the HRA 's audit and sanctioning work, the following synergies are foreseen: the issuance of the Ministry of Environment and Energy - Minister in charge according to Law 4819/2021 no.67 par.4. "When carrying out the inspections, the HRA may request the assistance of the General Directorate of the Inspectorate of the Body of Inspectors and Auditors of the Ministry of Environment and Energy, the competent authorities for the environmental licensing of the installation, the environmental auditors of article 20 of Law. 4014/2011 (A' 209), the Independent Public Revenue Authority (IPRA), the General Secretariat for Tax Policy and Public Property, the Accounting Standardization and Control Commission the audit services of the Ministry of Development and Investment and the development directorates of the regional units of the country, as well as any other public authority, in accordance with the provisions of the decision of par. 25 of Article 72'.

- According to Law 4819/2021 No.67 par.6, if the latter, in the context and for the purpose of assessing a complaint, requests from the above bodies data and any information, on a business-by-business basis and not only aggregated data, on intra-Community imports recorded in the Intra-Community Trade Statistics System (INTRASTAT) and on import declarations from third countries submitted to the customs authorities, respectively'.

Greek Police

Where a Police Authority, investigating a criminal offence that constitutes a basic offence under the Money Laundering Act (including environmental crime), has suspicions of money laundering, shall immediately inform the Anti-Money Laundering Authority (National Financial Intelligence Unit) for its own further action. Police Headquarters, having certainly made this issue one of its priorities, has proceeded to issue directives to our regional services, stressing the need for immediate and substantial cooperation with the Authority.

To this end, and in order to strengthen cooperation, a network of police officers has been set up in liaison with the Authority (2 officers per Police Headquarters) who act as points of contact with the Authority when investigating relevant cases, in order to achieve two-way communication. Indicatively, in 2021, two (2) orders were issued to the regional services of the Hellenic Police, with which Instructions and guidelines were provided regarding the enhancement of cooperation with the Authority for Combating Money Laundering from Criminal Activities and the best practices for the freezing of peripheral assets coming from serious and organised crime cases.

Recommendation n. 13. Consider carrying out more frequent road controls, with a focus on the illegal shipment of waste and enhancing the training and technical equipment available to public servants conducting physical controls on shipments (see 7.2.1 and 7.3 of the report)

N/A

Recommendation n. 14. Consider enhancing structured cooperation with neighbouring countries at the level of law enforcement authorities; (see 7.2.4 and 7.3 of the report)

Environmental Inspectorate of Ministry of Environment and Energy (EIMEE)

As part of the implementation of the LIFEPROWhIBIT project activities, it is scheduled an one-week workshop to be held in a neighbouring country under the responsibility of a law enforcement agency. The workshop will include:

- Presentation of the Greek National Strategy for the prevention and combating of environmental waste crime, the functioning of the Greek Coordination Committee, the operation of the Information System, lessons learnt and conclusions from the project activities implemented so far
- Discussions on the situation regarding environmental waste crime in the other country and identification of the key actors involved in the fight against environmental waste crime.
- Meetings with stakeholders

- Discussions on the use of the project's training material
- Organise and conduct a joint inspection on environmental waste crime as a form of on-site training for inspectors.
- Discussion on information exchange and joint operational activities

Greek Police

Greek Police participated in the global operations 30 Days at Sea 2.0 (1-31/10/2019) and 30 Days at Sea 3.0 (1-31/03/2021) conducted by INTERPOL, in cooperation with EUROPOL and FRONTEX, with the aim of combating environmental crime. Greek Police also participates in Europol's EMPACT priority "Environmental Crime", with a designated national representative, a member of the competent Ministry for the Environment and Energy.

Recommendation n. 15. Consider developing legal or financial instruments to ensure compliance by the communities with the ELV Regulation, in order to ensure that ELVs are treated by certified operators only ; (see 7.2.2 and 7.3 of the report)

N/A

Recommendation n. 16. Encouraged to remove existing barriers that provide incentives to commit environmental crimes (build waste and hazardous waste facilities in line with the existing action plans); (see 8.1 and 8.5 of the report); (see 8.1 and 8.5 of the report)."

N/A

List of abbreviations/glossary of terms

LIST ACRONYMS, ABBREVIATIONS AND TERMS	OF GREEK OR ACRONYM IN ORIGINAL LANGUAGE	OF GREEK OR ACRONYM IN ORIGINAL LANGUAGE	ENGLISH
NCPALG	EKDAA		National Centre for Public Administration and Local Government
COEL	SYGAPEZ		Coordination Office for Environmental Liability
HRA	<i>EOAN</i>		Hellenic Recycling Agency
EIMEE	<i>TEP</i>		Environmental Inspectorate of Ministry of Environment and Energy
FOTA			Fiscal and Customs Academy of the Hellenic Revenue Service

LIST ACRONYMS, ABBREVIATIONS AND TERMS	OF GREEK OR ACRONYM IN ORIGINAL LANGUAGE	GREEK OR ACRONYM IN ORIGINAL LANGUAGE	ENGLISH
