

**Format for the Aarhus Convention implementation  
report in accordance with Decision IV/4  
(ECE/MP.PP/2011/2/Add.1)**

**The following report is submitted on behalf of  
\_\_\_\_\_GREECE\_\_\_\_\_ [name of the Party or the  
Signatory] in accordance with decisions I/8, II/10 and IV/4.**

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submitting the national report: Konstantina Rempetekou

Signature: \_\_\_\_\_

Date: 30.04.2025

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**Implementation report**

**Please provide the following details on the origin of this report**

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**Party: Greece**

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## Aarhus Convention

Convention on Access to Information, Public Participation in  
Decision-making and Access to Justice in Environmental Matters

### Greece

#### 1 Process by which the report has been prepared

*Provide a brief summary of the process by which this report has been prepared, including information on the type of public authorities that were consulted or contributed to its preparation, how the public was consulted and how the outcome of the public consultation was taken into account, as well as on the material that was used as a basis for preparing the report*

*Year: 2025*

1. As environmental protection is taken into account in the planning and evaluation of all sectoral policies, the Hellenic Ministry of Environment and Energy (MoEE) coordinates the total of national public authorities at all levels of government (central, decentralised, local) and the public bodies involved for the implementation of policies related to environmental protection. In this context, among the Ministry's key priorities are: the protection of biodiversity and the natural landscape, the mitigation and adaptation to climate change, the improvement of air quality and soundscape, the promotion of renewable energy sources and energy efficiency, the sustainable management of mineral resources, the promotion of circular economy, the integrated water resources management and the effective management of forests and the promotion of sustainable regional planning and urban development. The MoEE is pursuing an ambitious environment agenda in the context of the Paris Agreement, the 2030 Agenda for Sustainable Development, the European Green Deal, and the commitment to a climate-neutral EU by 2050. The main objective is to ensure an inclusive and green transition, safeguarding key environmental principles.

2. Regarding the process by which this report has been prepared, the MoEE, apart from its competent Directorates, has invited the following Public Authorities and Public Bodies for consultation and contribution: Ministry of Economy and Finance, Ministry of Foreign Affairs, Ministry of Interior, Ministry of Education, Religious Affairs and Sports, Ministry of Health, Ministry of Infrastructure and Transportation, Ministry of Development, Ministry of Justice, Ministry of Culture, Ministry of Social Cohesion and the Family, Ministry of Rural Development and Food, Ministry of Maritime Affairs and Insular Policy, Ministry of Tourism, Ministry of Digital Governance, Ministry of Climate Crisis and Civil Protection, Presidency of the Government, Regulatory Authority for Waste, Energy and Water, Hellenic Food Authority, General Chemical State Laboratory, the Greek Ombudsman, as well as the 7 Decentralized Administrations and the 13 Regions of Greece, competent Independent Authorities, Non Governmental Organisations (NGOs), Research Centers and other institutions.

3. This report has been based on the report from the previous reporting cycle (2021) and has been updated with new information. The preparation included a consultation period of approximately 12 weeks (by e-mail, etc.) before the first draft was concluded. After the

completion of the first draft of the report, it was open for public consultation on the official website of MoEE for a period of six weeks. Comments were incorporated into the final version. This is the sixth report of Greece.

ENGLISH:

## 2 Particular circumstances relevant for understanding the report

*Report any particular circumstances that are relevant for understanding the report, e.g., whether there is a federal and/or decentralized decision-making structure, whether the provisions of the Convention have direct effect upon its entry into force, or whether financial constraints are a significant obstacle to implementation (optional).*

*Year: 2025*

4. According to Article 101 of the Constitution, the administration of the State is organized in accordance with the principle of decentralization. According to Article 102 of the Constitution, the administration of local affairs shall be exercised by local government agencies while the State shall supervise local government agencies, without infringing upon their initiative and freedom of action. The most recent administrative organization that came into force in 2011 is the “Kallikratis” Law (Law 3852/2010, Official Journal of the Government - OJG A’ 87), as in force following successive amendments. By “Kallikratis”, the former system of 13 regions, 54 prefectures and 1033 municipalities and communities was replaced by 7 decentralized administrations, 13 regions and 332 municipalities. More specifically: Municipalities (“Dimoi” in Greek) constitute the first level of local self-government. They are subdivided into the municipal units (“Dimotikes Enotites” in Greek), which are further subdivided into communities (“Koinotites” in Greek). Regions constitute the second level of local self-government and are divided into regional units (“Periferiakes Enotites” in Greek). Finally, the decentralised administrations constitute single units for the decentralised services of the state.

5. The widely acknowledged rules of international law, as well as international treaties including conventions and protocols, according to Article 28 of the Constitution require ratification by national law.

6. Greece ratified the Aarhus Convention in December 2005 (Law 3422/2005) and thus became a Contracting Party (see art. 3). For the purpose of a better understanding of this report, it should be noted that the implementation of the Convention in Greece is generally based on EU Directives and Regulations, which have already been transposed into national law (see art. 3).

ENGLISH:

## 3 Legislative, regulatory and other measures implementing the general provisions in article 3, paragraphs 2, 3, 4, 7 and 8

*List legislative, regulatory and other measures that implement the general provisions in article 3, paragraphs 2, 3, 4, 7 and 8, of the Convention. Explain how these paragraphs have*

*been implemented. In particular, describe: (a) With respect to paragraph 2, measures taken to ensure that officials and authorities assist and provide the required guidance; (b) With respect to paragraph 3, measures taken to promote education and environmental awareness; (c) With respect to paragraph 4, measures taken to ensure that there is appropriate recognition of and support to associations, organizations or groups promoting environmental protection; (d) With respect to paragraph 7, measures taken to promote the principles of the Convention internationally; including: (i) Measures taken to coordinate within and between ministries to inform officials involved in other relevant international forums about article 3, paragraph 7, of the Convention and the Almaty Guidelines, indicating whether the coordination measures are ongoing; (ii) Measures taken to provide access to information at the national level regarding international forums, including the stages at which access to information was provided; (iii) Measures taken to promote and enable public participation at the national level with respect to international forums (e.g., inviting non-governmental organization (NGO) members to participate in the Party's delegation in international environmental negotiations, or involving NGOs in forming the Party's official position for such negotiations), including the stages at which access to information was provided; (iv) Measures taken to promote the principles of the Convention in the procedures of other international forums; (v) Measures taken to promote the principles of the Convention in the work programmes, projects, decisions and other substantive outputs of other international forums; (e) With respect to paragraph 8, measures taken to ensure that persons exercising their rights under the Convention are not penalized, persecuted or harassed.*

*Year: 2025*

#### Article 3, paragraph 2

7. In Greece, there is an integrated legal framework regulating access to information in general and specifically environmental information in order to ensure that officials and authorities provide the required information and guidance to citizens.

8. The Aarhus Convention was ratified by the Greek Parliament in December 2005 through Law 3422/2005 (OJG A 303 /2005).

9. According to article 3, paragraph 9 (a) of the Joint Ministerial Decision (JMD) 11764/653/2006 (OJG 327B/17-3-2006) (codified by Presidential Decree (PD) 28/2015) by which the Directive 2003/4/EC on public access to environmental information was transposed, officials are required to support the public in seeking access to information. According to Article 3, paragraph 1, public authorities make available environmental information to any applicant upon request within the deadlines set by law. According to the majority of reports received by central and regional authorities, officials are generally familiar with the right to environmental information and support the public in seeking access to it.

10. The right to access to documents was originally defined in article 5 of the Administrative Procedure Code (Law 2690/1999). The provisions of this article have been radically changed as it has been replaced by article 59 of Law 5143/2024 (OJG A.161/11-10-2024). This article no longer refers to access to documents, but to access to public documents. The concept of public documents now formally includes private documents.

Under the previous legal regime, access to these two categories of documents was subject to the following conditions: in the case of administrative documents, the reasonable interest of the applicant, and in the case of private documents, a special legal interest and a connection with the applicant's case. Article 59 of Law 5143/2024 removes these requirements, equating the two categories of documents by extending the right of access to private documents, as a special legitimate interest is no longer required, but this right can be exercised by any interested party, as is currently the case for administrative documents. The new provisions thus facilitate access to private documents.

Moreover, the reasonable interest of the applicant is no longer a prerequisite for the exercise of the right of access to public documents as paragraph 1 of Article 59 clearly states that this right is granted to "any natural or legal person". However, an exception is introduced in paragraph 2 of the same Article as the reasonable interest is reintroduced as a criterion and condition for the exercise of the right "when the public document contains personal data of third parties".

A reservation as to the exercise of the right of access to public documents is maintained in the case of intellectual property rights, but it does not extend to industrial property rights, as was previously the case. It also specifies what is covered by secrecy and gives an indicative list of cases such as national defense, foreign policy, public security, medical, commercial and industrial secrecy. The new provision maintains the previous provision of Article 5 of Law 2690/1999 as to the fact that the right of access does not exist in cases where secrecy is violated.

Article 59 also provides for the way of exercising the right to submit a request (in person or electronically) for information as well as the time limits for the administration to accept or reject the request.

Moreover, in paragraph 6 it is mentioned that the concept of public service includes all bodies exercising public authority, regardless of their legal form.

Furthermore, according to paragraph 7, the Greek Ombudsman may set up a working group of experts, members of civil society organisations and members of the Public Administration in order to evaluate the implementation of Article 59. The conclusions and proposals of the working group shall be forwarded to the Greek Parliament, the Ministry of Interior and the Council of Europe and posted on the Ombudsman's website. Ministries' Officials, the Central Union of Municipalities of Greece, the Union of Greek Regions, as well as other persons or bodies may be invited to the meetings of the working group to express their opinions.

The public service may legitimately refuse to satisfy the application, if it becomes an obstacle to the effective operation of the public service. The exercise of this right in question is subject to certain negative conditions, which are provided for in paragraphs 3 and 5 of Article 5 of the Code of Civil Procedure which was replaced by article 59 of Law 5143/2024. Some conditions are set out in an absolute way, in the sense that they unequivocally exclude the right of access. In view of the above, the submission by the citizen who has a legal interest, of a request to the Administration to have access to documents, constitutes an exercise of a right recognized by law. The refusal of the Administration (explicit or implicit) to comply with such a request is an enforceable individual administrative act against which an application for annulment may be brought.

It should also be noted that, in the context of implementing Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR), incorporated into Greek legislation by Law 4624/2019, as in force following successive amendments, public services, before providing the applicant with information concerning personal data included in the case file, request the opinion of the GDPR officer.

Inconsistencies between Article 59 of Law 5143/2024 and the Aarhus Convention should be particularly noted. In specific:

a) the provision in Article 59 that the right of access cannot be exercised in certain cases of confidentiality or secrecy is inconsistent with the Convention, according to which the competent authority must take into account in each case the public interest served by the disclosure as well as "if the information requested is related to emissions into the environment".

b) Article 59 requires the existence of a "reasonable" interest when the requested information contains "personal data", in which case the competent authority shall require their removal prior to access. The requirement of "reasonable" interest is unjustified and incompatible with art. 4(1)(a) of the Convention.

c) In addition to the previous case (b), the GDPR allows access to environmental information, providing that the controller is not involved where "obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect the data subject's legitimate interests".

d) Grounds of refusal under art. 59 referring to "foreign policy", "state security", "professional secrecy", are broader than those defined by the Convention. In particular, (a) "foreign policy", if not under "international relations" (b) the "security of the state", if not subject to "national defense", "public security" or "public order" (which in any case is susceptible to abuse and cannot be subject to effective judicial or administrative control) (c) "professional confidentiality", if not included in "commercial and industrial information", "personal data" or "intellectual property rights", are not grounds of refusal according to the Convention.

e) Article 59 does not provide that, even in cases where the "confidentiality of commercial and industrial information" may be adversely affected, information on emissions related to environmental protection will be provided, while such regulation is provided for in the Convention.

Based on the above, we can conclude that the right of access to environmental information under the Convention and Directive 2003/4 is *lex specialis* in relation to national legislation (Article 59 of Law 5143/2024). In this context and in order to ensure the requirement for a clear, transparent and consistent framework with the objectives of the Convention, the application by public authorities of the Convention and Directive 2003/4, as incorporated into the national law. This prevents incompatibilities and conflicting interpretations and denials.

11. According to article 5A (1) of the Constitution, all persons are entitled to information, as specified by law. Restrictions to this right may be imposed by law only insofar as they are absolutely necessary and justified for reasons of national security, of combating crime or of

protecting rights and interests of third parties. Article 5A (2) specifies that that “All persons are entitled to participate in the Information Society. Facilitation of access to electronically handled information, as well as of the production, exchange and diffusion thereof constitutes an obligation of the State”.

12. Law 3979/2011 (OJG 138A/16.6.2011) on e-Governance, as in force following successive amendments and lastly by Law 4795/2021, provided the framework for the promotion of eGovernment in public administration, laying particular emphasis on: electronic communication and data exchange between natural/legal entities and the public sector.

13. Law 4727/2020 (OJG 184/A/23. 9.2020) on e-Governance (transposing Directives 2016/2102 and 2019/1024) and eCommunication, (transposing Directive 2018/1972) aims at drawing up a single legislative text to regulate e-governance issues in the public sector, removing regulatory barriers to efficient and remote access to public services and information, as well as promoting transparency by expanding digital applications. The provisions of this Law apply to the exercise of powers by public sector entities using Information and Communication Technology (ICT), the communication and transaction, between public sector entities and between public sector entities and natural or legal persons or legal entities, using ICT, and the access to public documents and their disposal for further use by means of ICT. Public sector bodies shall design e-governance services in such a way that they are user-friendly, ensure and enhance equality in access to e-governance information and services and take into account the specific needs of access for certain groups or individuals, in particular disabled people (article 3 paragraph 4). Access to documents, as provided for in Article 59 Law 5143/2024 (replacing Article 5 of the Administrative Procedure Code), also applies to electronic documents and may also be exercised using ICT. The provision of digital public services, and in particular the transfer of electronic documents, public or private, between public sector bodies and natural or legal persons or legal entities is carried out through the Single Digital Gate of the Public Administration (gov.gr - ECP). Access to that service requires previous authentication of the user. All public sector bodies are required to maintain websites as free and unrestricted websites for the purpose of informing and informing natural or legal persons or legal entities, on public policies, actions or programs that they plan and implement, unless otherwise provided by the institution concerned for reasons of safeguarding State confidentiality or privacy protected by a law provision.

14. Presidential Decree (PD) 28/2015 “Codification of regulations for the access to public documents and data”, codified all the provisions of laws regarding access to information and specified:

- dissemination of environmental information
- access to meteorological data and services of the National Meteorological Service
- restrictions on the access to geospatial data and services by third parties
- access to geospatial data and services by third parties
- terms and restrictions on access to the maps of the Hellenic Military Geographical Service
- access to cadastral data
- access to statistical data.

15. The National Printing House ([www.et.gr](http://www.et.gr)), according to Law 3469/2006 (A'131) -as amended by law 4590/2019 and PD 29/2018- is the public service for the dissemination of



Greek law, responsible for publishing and distributing the Official Journal. All laws and regulatory acts (presidential decrees, ministerial decisions, joint ministerial decisions) and other regulatory acts that have a financial burden or whose publication is required by law are published in the National Printing House in order to acquire formal force. Through the publication of the Laws and regulatory acts, the National Printing House contributes to enhancing transparency.

16. The “Diavgeia” (Transparency) Program (Law 3861/2010) aims to achieve the maximum possible publicity of government policy and administrative activity, to ensure transparency and to establish responsibility and accountability of public entities, thus contributing to the strengthening of good governance. Since October 2010, all decisions of government and administrative bodies, regulatory authorities and local government are posted on the Internet. By Law 4210/2013 (article 23) every act, except for those published in the Government Gazette, becomes effective only through its posting in “Diavgeia”. Each posted act is digitally signed and obtains a unique Online Registration Number, which is the identity of the Act. Citizens can invoke the posted documents in their interactions with the public services, without their validation being required. The Programme is offering: Friendly environment for the user, simple structure and language, application accessible to people with disabilities according to international standards, improved search engine and the ability to specialize the results.

17. Citizens Service Centres (CSCs or “KEPs”) have been established by the Ministry of Interior in regions and local authorities all over Greece by Law 3013/2002 (article 31), as last amended by law 4662/2020. CSCs are effectively assisting the citizens in dealing with public administration, and in accessing information and documents. The CSCs websites have been designed and developed for efficient electronic information and service for citizens.

18. The network of the CSCs is also supported by the online platform ‘eKEP’ (<https://ekep.gov.gr/>). The CSCs are linked together by an IP network and use the ‘eKEP’ platform to file and manage citizens’ requests. Accessible through the one-stop service centres across the country or through the Internet, the eKEP platform supports the use of certified digital signatures, enabling real time on-line transactions with Public Administration.

19. In 2024, Ministerial Decree 2243/252310/2024 on the implementation of conditionality as provided in Regulation EU 2021/2115 has been issued by the Ministry of Rural Development and Food. This legally binding act provides inter-alia for the environmental compliance of agricultural practices. Two sets of guidelines for farmers have been published to assist them in implementing the provisions (<https://www.agrotikianaptixi.gr/parembaseis-sskapp-pa/airesimotita/>, <https://minagric.gr/for-farmer-2/xorotajian/574-prostasia-periballon/15092-airesimothta-kap23-27>). Moreover, the Ministry makes publicly available, as open data, the environmental impact studies of land improvement projects, as well as data on climate and irrigation water quality throughout the country (<https://minagric.gr/for-farmer-2>).

### Article 3, paragraph 3

20. Greece has integrated environmental aspects in education at all levels and continues to work for the implementation of the 2015-2019 Global Action Programme on Education for Sustainable Development (ESD) and the 2021 UNESCO ESD for 2030 Framework and



Roadmap, in line with the 2030 Agenda and the SDGs. In 2018, the Ministry of Education, Religious Affairs and Sports established the Directorate for the Support of Programmes and Education for Sustainability in Primary and Secondary Education. As defined in Law 4547/2018, article 52, sustainability education is part of the curricula of primary and secondary schools with the purpose of promoting students' awareness on the interaction between human activity and the natural and social environment and enhancing their participation in actions that contribute to the overall effort to address relevant problems.

Since 2021 an initiative regarding teaching skills (Skills Labs) in nursery, primary and the first three years of secondary education is introduced in the Greek National Curriculum. One of the four thematic units is dedicated to the environment. Moreover, since 2022 the Greek National Curriculum "Environment and Education for Sustainable Development" for Nursery, Primary and Lower Secondary Education is implemented.

The Ministry of Education initiated a nation-wide project entitled: "Skills Labs for the 21st century" that is fully aligned with the "UNECE competences on ESD", the UNECE Framework for the implementation of the Strategy for ESD from 2021 to 2030 and the UNESCO "ESD for 2030" frameworks. The project was piloted during the school year 2020-21 and was included in the national curriculum of primary and lower secondary education for the school year 2021-22. It includes special workshops embedded in school curricula on the cross-cutting fields of sustainability, citizenship, health and STEAM. In spring 2020 and 2023, the Ministry made an open call to all competent stakeholders (NGOs, Museums, Research Centres, etc.) to submit relevant projects to be applied in the context of the "Skills Labs for the 21st century".

Both the Greek National Curriculum "Environment and Education for Sustainable Development" and Skills Labs promote knowledge and skills for: a) waste management, b) sustainable use of water supplies, c) use of public transportation, d) sustainable consumption, e) protection of natural resources f) energy efficiency, g) reduce of environmental footprint, h) understanding of the Greenhouse Effect and taking actions in order to reduce the consequences of climate change. The Curriculum was revised in 2023 in order to meet the targets of the 2030 Agenda, adopting whole system approaches for school management, transforming them into sustainable schools, and analyzing the interconnections of the natural, social and economic environment in relation to overconsumption, intensive agriculture, fishing and tourism.

Environmental education and ESD in Greece are provided by:

- (a) A geographically dispersed network of Centers of Education for the Environment and Sustainability (C.E.EN.S.). C.E.EN.S. have operated since the early 1990s as a trilateral cooperation between local governments, the central government, and the EU. They are entities of the Ministry of Education, under the Regional Directorates of Education all over the country and they promote policy for ESD in all levels of education, adopting the whole school approach. They provide short-term educational projects for school groups and courses for teachers and they assist schools in designing and using sustainability curricula.
- (b) Experts in charge of environmental education appointed in all local directorates of education also support teachers and schools (Law 4823/2021, article 26).
- (c) Primary and secondary schools can organize long-term projects on environmental education and ESD. Project topics on sustainability include among others the sustainable

house, the sustainable school, sustainable management of material and immaterial resources of the community, energy blueprint at school and at home.

- (d) Apart from the formal education delivered by State Institutions, Greece has a long tradition of non-formal and informal education schemes, several of which are well integrated in formal education and cover all priority areas. Educational programmes are implemented in schools by NGOs such as the Hellenic Ornithological Society, the Greek branch of WWF, MedSOS, MOm, Kallisto, Arktouros, Hellenic Society for the Protection of the Environment and the Cultural Heritage, EKBY, Archelon, Medies (Mediterranean Education Initiative for Environment and Sustainability), and MIO-ECSDE (Mediterranean Information Office for Environment, Culture and Sustainable Development). Every academic year, the Ministry of Education issues a call for expressions of interest for the organisation of educational programmes focusing on Sustainable Development by public/private bodies with educational activity, posted on its website (<http://edu-gate.minedu.gov.gr/>).
- (e) Several University departments have established graduate and postgraduate programmes dedicated to environmental education. Also, seminars on sustainable development for public servants are provided by the Institute of Training of the Greek Center of Public Administration and Local Government.

The Institute of Educational Policy coordinates projects for ESD competence-building. Actions of implementation of the new curriculum on environment and ESD are a) schools' adoption of land (such as forests) and coastal ecosystems and b) schools' actions for animal welfare. The overall aim is to integrate the principles of ESD in curricula at the primary and secondary educational level.

Digital educational materials on environmental issues are uploaded on the "Photodentro" (Tree Light) platform, which is part of a digital infrastructure for educational content in schools run by the Institute of Educational Policy. Photodentro is open to students, teachers, parents and the general public.

Greece, via the Institute of Educational Policy, participates in relevant European projects. For example, Greece is a partner in the SYNAPSES project (<https://synapses-academies.eu/>), which develops an accreditation scheme for both sustainability and citizenship, assessing educational activities, programmes and resources. Furthermore, the AELIA project (<https://www.aelia-project.eu/about-the-project/>) supports educational institutions' management and leaders to apply sustainability plans including monitoring and evaluating their sustainability levels through capacity building on the guidelines for sustainability plans.

21. The Sustainable School label, administered by an environmental NGO, is a certificate that rewards schools for sustainable practices. Introduced in 2015, it involves 40 criteria covering pedagogical, social and environmental activities and functions. Schools enroll in the programme at the beginning of a school year and submit a "sustainable school calendar" to report on a set of indicators at the end of the year. Among other requirements, schools have to create a sustainable school management plan and a related activity program. Similar initiatives include the international Eco-Schools program and the Greek Sustainable School, run by the Hellenic Society for the Protection of Nature.

22. At the level of Higher Education, the majority of the Greek Universities have introduced SD-related themes in their curricula. Most of them include Environmental and ESD related courses at postgraduate level. Some of them have established the “whole institution approach”. In that direction, the rectors of Greek Universities at their 67<sup>th</sup> Conference have adopted a “Charter for Sustainability”, introducing many elements of the UNECE documents on indicators, competences etc to the higher education practices. The following UNESCO Chairs work on issues related to ESD:

1. UNESCO Chair on ICT’s in ESD (University of Crete).
2. UNESCO Chair on Disaster Risk Reduction (National Observatory of Athens).
3. UNESCO Chair on Green Innovation and Circular Economy, (National Technical University of Athens).
4. UNESCO Chair on Geoparks and Sustainable Development of Insular and Coastal Areas (University of the Aegean).
5. UNESCO Chair on “sustainable management of water and conflict resolution (Aristotle University of Thessaloniki).
6. UNESCO Chair in “Creative Cities in Motion: Urban Sustainable Mobility and Utilization of Cultural Resources” (University of Piraeus).
7. UNESCO Chair on Climate Diplomacy (National and Kapodistrian University of Athens).
8. UNESCO Chair on “Management and Education for Sustainable Development in the Mediterranean" (University of Athens).
9. UNESCO Chair on Conservation and Ecotourism of Riparian and Deltaic Ecosystems Eastern Macedonia and Thrace Institute of Technology (International Hellenic University).
10. Geophysical and geological risk reduction (Hellenic Mediterranean University).

23. Another ESD related activity, in the framework of youth awareness regarding issues on the protection of cultural heritage and the natural environment, is the organization of educational programs in archaeological sites and museums by the Ministry of Culture. The Ministry initiated a communication action throughout the country entitled “Environment and Culture”. In this framework, a number of events were organized, aiming at the awareness on the protection of the cultural and natural heritage, the youth awareness about the existing bonds between the cultural heritage and the natural environment, the promotion of the environment as a means of inspiration and creativity and at the reinforcement of the belief that cultural issues go hand in hand with the sustainable management of natural resources.

Moreover, in the framework of the National Action Plan for Education for Sustainable Development, the nation-wide campaign “Green Cultural Routes” aims at educating citizens on the protection of the country’s cultural wealth and natural environment, (<https://youtu.be/gQCiofv5SfM?si=1t2zDes2RK4dE33k>).

24. Greece, as a repository of a wealth of cultural heritage from antiquity to modern times, organized an international conference in Athens in 2019, gathering world-renowned scientists from over 40 countries, to raise awareness on this issue. The conclusions of the conference led to Greece’s proposal to develop an international framework to strengthen cultural and natural heritage resilience to climate risks. It was launched in partnership with UNESCO and the World Meteorological Organization at the 2019 UN Climate Action Summit in New York. So far, more than 100 UN member states and many NGOs and organizations have expressed their support to the proposal that includes three tiers of activities: research, infrastructure and education (see also <https://ccich.gr/>).

On the same issue, the Ministry of Culture, in the framework of the UN HLPF 2022, organized the side event “The Impact of Climate Change on Cultural Monuments”, in cooperation with the National and Kapodistrian University of Athens and the Ministry of Climate Crisis and Civil Protection, aiming to contribute to the new knowledge regarding the impacts of climate change on cultural heritage and the main priorities of adaptation plans.

25. Since the protection of the environment can play a “horizontal” catalytic role in achieving overall sustainable development objectives, awareness raising and informal education activities are undertaken by the MoEE on particular environmental issues, as educating public on how-to live-in harmony with nature is a cornerstone of education for sustainable development. Some indicative examples are the following:

- Undertaking actions to raise public awareness on environmental issues is one of the main objectives of the Natural Environment and Climate Change Agency (NECCA) established in accordance with Article 27 of Law 4685/2020 (OJG 92/A/7.5.2020), as amended and in force, where the 24 Management Bodies of the Protected Areas have been incorporated.

- The Management Bodies of the Protected Areas (Natura 2000) established in accordance with Article 34 of Law 4685/2020 all have environmental education centers that target school students of all ages and help translate, through practical training, overall sustainable development objectives down to the local level.

- MoEE participates in various research projects as a partner; the most emblematic ones are the LIFE projects. A very important component of all LIFE projects is the information sharing, education and awareness raising of the public, including local communities and youth, through specialized communication material and activities. Indicative examples include: (a) the LIFE IP 4 NATURA with a duration of 8 years with one of its eight components particularly dedicated to education and awareness raising on the values of the NATURA 2000 sites for overall local sustainable development; (b) the LIFE Cyclades (<http://cycladeslife.gr/en/multimedia-2/materials/>) that targets important protected areas in the Aegean facing particular pressures from tourism.

- Greece presented its 1st Voluntary National Review (VNR) at the UN High-Level Political Forum on Sustainable Development in 2018 and the 2nd VNR in 2022. The process for elaborating the 2nd VNR was led and coordinated by the General Secretariat of Coordination of the Presidency of the Government, a “center-of-government” entity to ensure alignment of policies and measures with key government priorities, as well as with the general objective for sustainable development. The drafting process was carried out in close cooperation and consultation with all line ministries and the Hellenic Statistical Authority. In parallel, other key entities, like the Hellenic Parliament, regional/local authorities, social partners and civil society, were actively involved in the process that was guided by a whole-of-government and whole-of-society approach. The 2022 VNR Report had been set under public consultation before being finalised and submitted to UNDESA.

- Awareness raising campaigns for the protection of marine and coastal environment are also carried out by the participating partners in the Blue Flags programme, the most widely recognised ecological label for beaches, marinas and sustainable tourism crafts. Greece has a longstanding excellent record in keeping a very high quality of coastal bathing waters, ranking among the top countries worldwide for 30 years now that the global programme of

Blue Flags, is being implemented (<https://www.blueflag.gr/sites/default/files/page-files/leafletaktes2018005-en-rgbmed.pdf>).

- For promoting sustainable urban mobility in Greek cities, dedicated training courses are being organised for the representatives of interested municipalities, on a repetitive basis, by the involved Ministries (Ministry of Infrastructure and Transport with experts from the Ministries of Environment and Energy and of Interior) and the Institute of Training of the Greek Center of Public Administration and Local Government to help build their capacities to elaborate their own Sustainable Urban Mobility Plan.

- The General Secretariat of Spatial Planning and Urban Environment of MoEE supports the participation of Greek cities in the EU Mission “100 Climate-Neutral and Smart Cities by 2030” through regular updates, keeping all stakeholders well informed and engaged. The six Greek cities of the Mission are actively participating, each implementing pioneering projects.

26. “GR-eco Islands” is a strategic initiative of the Greek Government that promotes sustainable development and energy autonomy in the Greek Islands by 2030. Key pillars of the initiative include: the promotion of renewables and energy efficiency, sustainable waste and water management, zero pollution schemes, electrification of transport and green transformation of agriculture and tourism. In this context, awareness raising and consultation actions, with the participation of regional and local stakeholders, have been organised.

27. The educational programme “Plastic Waste? Into the blue bin, away from the blue sea!” targeted local communities in islands (Paros, Antiparos, Lefkada, Rhodes, etc.) run by the MEDIES Educational Network and supported by the Hellenic Recovery Recycling Corporation (HERRCO). The aim of the programme was to sensitize students, teachers and citizens on marine litter issues as well as to stimulate a behavioural shift away from the single-use plastics (SUPs) mentality. It entailed educational activities in primary and secondary schools, teacher training and public awareness raising events.

28. The Marine Environment Protection Directorate of the Ministry of Maritime Affairs and Insular Policy/Hellenic Coast Guard Headquarters launched an awareness campaign for students regarding marine litter and coastal pollution in order to enhance environmental consciousness.

29. In the tourism sector, a project funded by the EU Recovery and Resilience Facility will be undertaken in 2024-25 to upskill and reskill tourism workers through vocational programmes. A model of circular economy in tourism enterprises is also promoted via tourism education. Furthermore, within the educational units of the Ministry of Tourism, special emphasis is given on fostering “green culture” and on implementing on-the-job methods and policies aiming at sustainable tourism.

30. The Ministry of Interior has established a Local Government Performance Monitoring Node (<https://deiktesota.gov.gr>), according to Article 33 of Law 5056/2023, OJG A’ 163, as amended by Law 5143/2024 OJG A’ 161, in order to enhance the transparency and public accountability of the country's municipalities and regions, through direct access by citizens to data concerning the assessment of their operation and work, including environmental data.

31. The Asterousia Mountain Range Biosphere Reserve, located in the southernmost area of Europe with a long coast and wide marine zone in the Southern Cretan / Libyan Sea was

where MIO-ECSDE conducted a year-long (September 2022 – August 2023) activity that contributed to filling in the knowledge gaps through participatory science and promoting ocean literacy. Funded by UNESCO and the abrdn Charitable Foundation, NGOs, local bodies and researchers together designed and implemented a community-based research initiative on marine litter mitigation. The main lines of action were: Organization of a high-calibre and effective participatory science campaign aiming to generate fit-for-purpose marine litter data and co-create scientific knowledge by engaging all societal actors; Implementation of education for sustainable development and ocean literacy interventions focused on marine litter and marine plastic pollution; Setting up a platform to collectively deliberate and establish consensus on the most promising and scalable solutions that should be implemented towards litter-free coasts and sea.

32. Greece is following the UNECE and UNESCO Education for Sustainable Development (ESD) contexts and the Mediterranean Strategy on ESD processes. Within these processes, the Ministry of Education participates in the Mediterranean Committee on ESD (MCESD), established in 2016, which proposed region-wide programmes and thematic priorities as well as indicators for monitoring the progress, in line with the ones for SDG 4.7.

Greece is actively participating in the UNESCO Green Education Partnership aiming at the following pillars: (a) Greening Schools, (b) Greening Curriculum, (c) Greening Teacher Training and Education Systems' Capacities (d) Greening Communities.

In cooperation with Mediterranean countries the MCESD organizes tailor-made activities to provide support for the implementation of the AP/MSESD in alignment with the national 2030 frameworks, through training and consultations. From 2016 until 2023:

- 5 national ESD policy frameworks were prepared, considering the MSESD and its Action Plan.
- At least 11 national and regional training sessions (“training the trainers”) took place.
- 19 countries in the region were technically supported in promoting ESD in their national contexts.
- 1.700 administrators and educators were engaged in interactive training and dialogues.
- 1 Flagship Project of UNESCO/GAP was dedicated to the Action Plan of the MSESD.
- 1 Sustainability Charter was prepared and adopted by the Greek Universities.

#### Article 3, paragraph 4

33. It should be noted that in Greece the participation of the public and its representative bodies, including NGOs, as well as their access to justice, are constitutionally, legally and jurisprudentially guaranteed, regardless of the existence of a legitimate interest.

The public and the NGOs can submit comments and proposals on environmental issues at the preliminary stages of the decision-making process as well as during the public consultation processes. NGOs are officially registered and recognized as partners in various ministries. However, there is not one single entity responsible for registering and inventorying NGOs. Registries are kept by the Ministry of Foreign Affairs, for different purposes. In particular, its Service for the Implementation of the Development Assistance and Cooperation Programme of Greece (the so-called Hellenic Aid Service) has been inventorying (since 2000) NGOs active in all fields (e.g. medicine, humanitarian, environment, education) that fulfil certain "quality" criteria and are thus eligible to receive



State funding to implement, as intermediaries, development aid and cooperation projects in third/developing/recipient countries. It should also be noted that organisations are registered, depending on their legal status, in the Court of First Instance (in the case of Associations), in the General Registry of Civil Non-profit Companies, and in the register of charitable foundations. MoEE has also inventoried the environmental NGOs that it had funded in previous years, either with core funding or for the implementation of specific projects following a certain call. Moreover, by Law 4873/2021, a database of civil society organisations as well as a special register, supervised by the Ministry of Interior, were established (<https://okoip.gov.gr/CSOIS/home.html>). The Natural Environment and Climate Change Agency (NECCA) also maintains a register of NGOs (<https://necca.gov.gr/mitroo-engrammenon-m-k-o/>).

34. According to the legislation for the protection and sustainable management of water resources in Greece (Law 3199/2003, art. 6 as in force following successive amendments and lastly by article 30 of Law 5037/2023), which integrates the public participation requirements of the EU Water Framework Directive (2000/60/EC), the active involvement of interested parties is ensured through their representation at the level of decentralized administration and especially in the Water Councils that are being developed as part of the 7 Decentralized Administrations of the country. The Water Councils are advisory boards in which all interested groups are represented, such as the involved organizations, NGOs, etc.

35. The Natural Environment and Climate Change Agency (NECCA), supervised by MoEE, was established by Law 4685/2020 (OJG 92/A/7.5.2020), with the aim to implement the Ministry's policies for the management of protected areas, the conservation of biodiversity, the promotion and implementation of sustainable development actions and the fight against climate change. Within the framework of its competences (Article 27): (a) it organises, in cooperation with MoEE, a dedicated free access web portal, where all available information on the conservation and protection status of Greek biodiversity is posted; (b) collects, manages and processes data from databases and information networks on the environment and climate change. NECCA established and operates the climate dialogue forum under the <https://climaregistry.necca.gov.gr> url.

The Protected Areas Governance System at the regional level consists of: a) the Protected Areas Management Units (PAMUs), b) the Decentralized Administrations, c) the Regions and d) the Municipalities.

The PAMUs (Article 34) (a) participate in the preparation, implementation, monitoring and evaluation of the management plans of the protected areas under their territorial jurisdiction and monitor the status of species and habitat types of international, EU and national interest; (b) prepare annual reports on the protected areas under their territorial jurisdiction; (c) consult with the local community, producers and all other stakeholders for the integrated management, protection and conservation of the protected areas under their territorial jurisdiction (d) inform and raise awareness about the work and objectives of NECCA. In order to support the PAMUs in the management of protected areas, local Management Committees are established (Article 35) with the participation of specialised scientists, representatives of local authorities of the first and second level and other public authorities involved, representatives of environmental NGOs as well as representatives of productive sectors, cultural, environmental and professional bodies of the area. NECCA is responsible for the evaluation of the PAMUs, which is carried out annually on the basis of the objectives of the management plans of the protected areas. The results of the evaluation are made public.



36. PD 148/2009 -transposing Directive 2004/35/EC on environmental liability- provides for the right of citizens and NGOs to request for remedial measures in the event of environmental damage by an activity, irrespective of legitimate interest (Article 13). The competent authority [the Coordination Office for Mitigation of Environmental Damage of MoEE (“SYGAPEZ”) or the Decentralised Administration at regional level] determines the appropriate measures to be taken. Additionally, responsible operators, specialized experts as well as NGOs and citizens may be invited to the meetings of the Interministerial Committee for Environmental Damage Mitigation (Article 6), which has an advisory role to the Minister regarding the prevention and restoration of environmental damage.

37. Moreover, the "Consultation Forum on Environmental Responsibility under the LIFE PROFILE project" is an ad hoc structure, coordinated by SYGAPEZ. The Forum brings together representatives from administration, professional bodies, NGOs, academia, and aims to strengthen the dialogue, information and participation of those directly involved in the implementation of the financial security provided for by Directive 2004/35/EC on environmental liability and as transposed into national law by PD 148/2009.

38. Law 4780/2021 expanded the composition of the National Human Rights Commission (NHRC), which is the national institution for the protection of human rights, and provided, for the first time, for the participation of a person nominated jointly by WWF and Greenpeace as a member of the Commission (article 13 (1) (k)). With this provision, the possibility for the Commission (see competences in Article 12) to engage with environmental/climate change issues, from a human rights perspective, is enhanced.

#### Article 3, paragraph 7

39. Greece promotes the Convention's principles of transparency, access to information and public participation in international forums, international environmental negotiations and decision-making processes. The MoEE as well as other Ministries invite NGO representatives to participate as experts in international meetings. NGOs can also participate, upon invitation, in national preparatory meetings for international Conferences, Events and processes such as the process of adopting and adapting the global Sustainable Development Goals (SDGs) in national circumstances and priorities and consequently the on-going process of their implementation. It should be pointed out that regarding SDGs particular emphasis has been given, from the start, to raising awareness at all levels. Greece's intention is to build strong partnerships with all relevant stakeholders in the implementation process of the SDGs at national level, from the Parliament and its dedicated committees, public administration and local authorities to civil society and the private sector. However, stakeholder consultations with the Government on the SDGs is not yet an established procedure. Thus, options for setting up a permanent stakeholder consultation platform for SDGs implementation, that will facilitate a structured social dialogue in the longer-run, need to be sought. To this end, Greece is already exploring best practices and success stories from other countries.

40. Greece organized the 9th “Our Ocean Conference” (OOC-9 ), in Athens, on 16-17 April 2024, gathering more than 3,500 participants. The Youth Leadership Summit of OOC-9 (April 15<sup>th</sup>) assembled participants from more than 60 countries. OOC-9 had a significant high-level participation of governmental officials and representatives from International Organizations, academia, scientists, businesses and NGOs, who all worked together to

advance ocean issues on multiple levels in support of achieving SDG 14. During the Conference, special focus was given on challenges of national, regional and global interest, such as sustainable tourism, green shipping, marine plastic pollution and green transition in the Mediterranean.

41. The MoEE is responsible for the integration of international and European policies with a spatial dimension into national spatial planning. It is thus the competent authority for the implementation of the Council of Europe (CoE) Landscape Convention. Greece has been participating in the CoE Landscape Award since 2016 with a representation of an example of good practice in landscape selected following an invitation by the General Secretariat for Spatial Planning and Urban Environment to the administrative Regions, Municipalities and their associations, as well as to NGOs active in landscape issues. In April 2022, MoEE, in cooperation with the Special Executive Secretariat of the CoE Convention, organized the event “National Symposium on the implementation of the Council of Europe Convention on landscape and Forum of the National Selections of the 6th Conference of the Landscape Award of the Council of Europe”. Regarding public participation in spatial planning, information is provided under Article 7 of this Report.

42. In the context of the 29th session of the Conference of the Parties to the United Nations Framework Convention on Climate Change that took place at Baku, Azerbaijan, on 11-22 November 2024, the MoEE organised a multitude of events at the national pavilion. Distinguished personalities in the fields of politics and science, as well as NGOs active in the environmental and energy sectors, were invited to speak and present their initiatives.

43. The Marine Environment Protection Directorate of the Ministry of Maritime Affairs and Insular Policy/ Hellenic Coast Guard Headquarters, provides constant information to the institutions of the Greek shipping industry, shipping centre operators and other specialized institutions and organizations, such as the Hellenic Centre of Marine Research (HCRM) and the Hellenic Marine Environment Protection Association (HELMPEA) about the international forums and meetings for the environment, in order to give them the possibility to participate.

44. The General Secretariat for Natural Environment and Water: (a) coordinates the relevant authorities and participates in EU bodies for all matters concerning the protection and management of water resources (b) prepares the required reports submitted to the EU, as well as the annual reports to the National Water Commission (c) represents the country in international and EU institutions and the Ministry of Environment and Energy in national level (d) provides to the EU, through the National Infrastructure of Geospatial Information, access on data regarding the state of EU Marine Environment.

45. Accession to the Aarhus Convention (AC) is encouraged as a flagship initiative under the Mediterranean Commission for Sustainable Development (MCSD). A target associated with this strategic direction is that by 2025, two-thirds of Mediterranean countries will have acceded to the AC.

In support of the implementation of this flagship initiative, Athens was where the first ever Regional Training took place dedicated to the Promotion of the Aarhus Convention in the whole of the Mediterranean, on 14 - 15 November 2023. It was co-organized by the EU funded “Water and Environment Support (WES) in the ENI Neighbourhood South Region” project (the Athens based NGO MIO-ECSDE is a consortium member) and the UNECE

Aarhus Convention Secretariat (<https://www.wes-med.eu/first-ever-regional-training-dedicated-to-the-promotion-of-the-aarhus-convention-in-the-whole-of-the-mediterranean-delivered-by-wes-and-the-unece-aarhus-convention-secretariat/>). This capacity building initiative is part of a collective effort to promote Environmental Governance in the Mediterranean by encouraging the accession to and implementation of the Aarhus Convention. Apart from the EU and the UNECE Aarhus Convention secretariat, other bodies that Greece is active in are backing the process, such as the Barcelona Convention system, the Union for the Mediterranean (UfM), the Circle of Mediterranean Parliamentarians for Sustainable Development (COMPSUD), the Energy, Environment and Water Committee of the Parliamentary Assembly of the Union for the Mediterranean (PA-UfM). Also, the Athens based MEPIELAN Centre, which has been part of the effort from the beginning, developed with EU LIFE Programme support the Foundation Discussion Document for the ‘Mediterranean Accession Agenda to the Aarhus Convention’.

An important action of MEPIELAN is the establishment of the “MEPIELAN Aarhus Centre (MAC)” as an NGO-based Aarhus Centre, in accordance with the OSCE relevant Guidelines and in collaboration with the OSCE, the UNECE Aarhus Convention Secretariat and the UNEP/MAP Barcelona Convention. The MAC, although not yet operational, will function as a national entity with a regional scope (Mediterranean, Balkans) and will cooperate with governmental bodies, relevant international organizations and civil society, in order to promote the implementation of the Aarhus Convention at national and regional level.

#### Article 3, paragraph 8

46. There is an integrated legal framework in Greece, as already mentioned, ensuring the exercise of the rights provided for by the Convention.

47. In particular, Articles 4 to 25 of the Constitution provide for the protection of human rights, including the free development of one's personality, the participation in the social, economic and political life of the country and the recognition of the value of human dignity.

48. Article 24 of the Greek Constitution enshrines the mixed right (individual, social and political) of everyone to the natural and cultural environment and, at the same time, establishes the obligation of the State to protect it and take preventive or enforcement action under the principle of sustainability.

49. All citizens, in the framework of their protection, have several possibilities for administrative and judicial review as well as actions for compensation according to the civil liability provisions (see art. 9).

However, in some cases obstacles are observed in the exercise of the rights provided for in the Convention to natural or legal persons, including NGOs, by the exercise against them of manifestly unfounded or abusive legal proceedings or harassment due to their public participation. As an example, WWF Greece and the Hellenic Ornithological Society point to the prosecution of a local NGO by a company that operates local shipyards, arguing that the NGO's mainly letter-based campaign suggested that shipyards are the source of pollution.

Competent national authorities are encouraged to make every effort to discourage such practices that weaken the implementation of the Convention.

In this context, Directive 2024/1069 “on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (‘Strategic lawsuits against public participation’)” (not yet incorporated into national law) will significantly strengthen and enrich the legislative arsenal against manifestly unfounded or abusive judicial procedures against public participation.

50. The MoEE supervises the collection and publication of core environmental data, in collaboration with the Hellenic Statistical Authority. NECCA (Law 4685/2020) prepared the latest comprehensive State of the Environment Report of Greece for 2022, currently under revision by the EEA. Climate change, air quality, biodiversity, noise, waste and circular economy, state of water and environmental authorization are discussed in the report.

51. Facility operators must report pollution release data annually to the MoEE Directorate of Environmental Permitting, which sends the data to the European Environment Agency for compilation and dissemination in the European Pollutant Release and Transfer Register. The MoEE has also launched a national geoportal which provides access to geospatial data.

52. The Ministry of Interior has issued the “Guide of Good Administrative Behaviour” and the “Rights of citizens and enterprises in their transactions with public services”, seeking to inform the public about its rights, available at the Ministry’s website. Supporting the citizen in high quality terms is among the major objectives of public administration. By adhering to the principles of Good Administrative Behavior described in the guide, the highest possible standards of conduct are highlighted in the daily dealings between civil servants and citizens.

ENGLISH:

#### 4 Obstacles encountered in the implementation of article 3

*Describe any obstacles encountered in the implementation of any of the paragraphs of article 3 listed above.*

*Year: 2025*

53. The obstacles and problems identified are:

- Limited financial support in the framework of environmental education.
- Insufficient financial and human resources.
- Some Services mentioned that in some cases they receive abusive requests for information which poses difficulties to public servants to accomplish their tasks.
- As some NGOs point out, some administrative bodies still interpret the grounds for refusal in a non-restrictive manner.
- In cases where a valid ground for refusal exists, authorities do not always separate the non-exempted information from the set of requested information.
- When the authorities have not collected environmental information, no request for the provision of environmental information can de facto be accepted, such as e.g. in the case of non-application of Article 4 of Directive (EU) 2014/89 (on marine spatial planning).
- Lack of appropriate infrastructure.
- Need for further codification of existing environmental legislative framework.

- Lack of effective coordination between various government agencies and services.

ENGLISH:

## 6 Website addresses relevant to the implementation of article 3

*Give relevant website addresses, if available:*

*Year: 2025*

<https://ypen.gov.gr/> - MoEE

<http://www.coe.int/t/commissioner/source/NAP/Greece-National-Action-Plan-on-Human-Rights.pdf> - Human Rights National Action Plan

<https://www.mfa.gr> - Ministry of Foreign Affairs

<https://www.ynanp.gr> - Ministry of Maritime Affairs and Insular Policy

<http://www.minedu.gov.gr/> - Ministry of Education, Religious Affairs and Sports

<http://www.minagric.gr> - Ministry of Rural Development and Food

<https://ekep.gov.gr/> - Citizens Service Centres

[Networkhttps://joinup.ec.europa.eu/sites/default/files/ckeditor\\_files/files/eGovernment%20in%20Greece%20-%20February%202016%20-%20v%2018\\_0\\_2\\_00.pdf](https://joinup.ec.europa.eu/sites/default/files/ckeditor_files/files/eGovernment%20in%20Greece%20-%20February%202016%20-%20v%2018_0_2_00.pdf) – eGovernment in Greece

<https://www.hcg.gr> – Hellenic Coast Guard

<http://bathingwaterprofiles.gr> - Greek Bathing Water Profiles Registry

<http://nmwn.ypeka.gr> - National Monitoring Water Network

<https://wfdver.ypeka.gr> – River Basin Management Plans

<http://lmt.ypeka.gr> - Register of water abstraction points

<http://floods.ypeka.gr> - Flood Risk Management Plans

<https://www.et.gr> - National Printing House

<http://www.gcsel.gr> - General Chemical State Laboratory

<https://hlpf.un.org/countries/greece/voluntary-national-review-2022> – VNR Greece 2022

<http://et.diavgeia.gov.gr> - Diavgeia” (Transparency) Program

ENGLISH:

## 7 Legislative, regulatory and other measures implementing the provisions on access to environmental information in article 4

*Explain how each paragraph of article 4 has been implemented. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3,*

paragraph 9. Also, and in particular, describe:  
 (a) With respect to paragraph 1, measures taken to ensure that: (i) Any person may have access to information without having to state an interest; (ii) Copies of the actual documentation containing or comprising the requested information are supplied; (iii) The information is supplied in the form requested; (b) Measures taken to ensure that the time limits provided for in paragraph 2 are respected; (c) With respect to paragraphs 3 and 4, measures taken to (i) Provide for exemptions from requests; (ii) Ensure that the public interest test at the end of paragraph 4 is applied; (d) With respect to paragraph 5, measures taken to ensure that a public authority that does not hold the environmental information requested takes the necessary action; (e) With respect to paragraph 6, measures taken to ensure that the requirement to separate out and make available information is implemented; (f) With respect to paragraph 7, measures taken to ensure that refusals meet the time limits and the other requirements with respect to refusals; (g) With respect to paragraph 8, measures taken to ensure that the requirements on charging are met.

*Year: 2025*

#### Article 4

54. With articles 42-49 of PD 28/2015 referred to the procedure for exercising the right of access to environmental information, the Ministerial Decision 11764/653/2006, issued in compliance with Directive 2003/4, was precisely incorporated. In particular, according to Article 44 of PD 28/2015: **1.** Every natural or legal person has the right, upon a written request to the public authorities, to request information on the environment without invoking the existence of a legitimate interest. **2.** The public authority shall provide the applicant with an acknowledgment of receipt, as well as the time limit for providing information. **3.** The public authorities are obliged to respond in writing to the requests and to provide the requested information within a time limit of: a) twenty days from the date of receipt of the application b) two months from the date of receipt of the application, if, due to the amount and complexity of the information requested, it is not possible to meet the deadline of twenty days. In such cases, the applicant shall be informed as soon as possible, and in any case before the expiry of the twenty-day period, of any extension, as well as of the reasons for it. Exceeding deadlines is acceptable in case of force majeure, as well as when the applicant invokes the existence of facts known to the public authority. **4.** If the application is submitted to an incompetent authority, this authority must, within three days, forward it to the competent authority and notify the interested party. In this case the deadline starts from the time the application was received by the competent authority. For cases under the jurisdiction of more than one authority, the time limits shall be extended by a further eight days. **5.** If a request cannot be processed due to objective reasons, specifically justified, the competent authority must, within three days before the expiry of the relevant deadline, notify the applicant in writing regarding: a) the reasons for the delay, b) the official who has taken over the case for providing the information and c) any other useful information. **6.** If the application is made in an indefinite manner, the public authority shall ask the applicant, as soon as possible, to clarify the application and provides assistance for it. Public authorities may, on a case-by-case basis, reject the application. **7.** If the applicant requests from a public authority environmental information in a specific form or format, the public authority shall grant the request, except in cases where: (a) they are already available to the public in another form or format, or (b) it is reasonable for the public authority to provide this information in another form or format, Public authorities shall make every reasonable effort to ensure that environmental information is provided in a form or format that allows easy reproduction and

access by computer or other electronic communication technologies. The reasons for which the request for this information is rejected in whole or in part, in the form or format requested, shall be notified to the applicant within the time limit referred to in paragraph 3 (a). **8.** The right of access to environmental information shall be exercised by on-the-spot study or by the provision of a copy, unless its reproduction may damage the original. The cost of reproduction shall be borne by the applicant, without prejudice to Article 46. **9.** To facilitate the exercise of the right of access: (a) officials must support the public in seeking access to environmental information; (b) lists of public authorities must be accessible to the public; and (c) public authorities must make the necessary practical arrangements. The public authorities shall inform the public of their rights and shall provide appropriate information, guidance and advice.

55. Furthermore, according to Article 45 of the above PD on the conditions for rejection of applications-exceptions: **1.** The competent authority may reject the application for the provision of environmental information when the application: a) Is manifestly irrational or is formulated in an overly vague manner, is incomprehensible, manifestly unfounded or repeated in an abusive manner. b) Relates to incomplete material or incomplete documents and data. In this case the public authority shall indicate the name of the authority processing the material and the estimated time required to complete it. c) Concerns internal communications-announcements of public authorities taking into account the public interest served by the disclosure of this information. **2.** Public authorities may reject requests for environmental information if the disclosure of such information could adversely affect: (a) the confidentiality of Ministerial Council's meetings and public authority procedures; international relations, public security or national defense; (b) the functioning of justice, the ability of any person to receive a fair trial or the ability of a public authority to conduct a criminal or disciplinary inquiry; (c) the confidentiality of commercial or industrial information; where applicable, in order to protect a legitimate financial interest, including the public interest in maintaining the confidentiality of statistics and tax secrecy, (d) intellectual property rights, (e) the confidentiality of personal data and / or files relating to a natural person that has not consented to the disclosure of the information; (f) the interests of the protection of any person who has provided the requested information voluntarily without being or may be legally liable; unless the person concerned has consented to the disclosure of such information; (g) the protection of the environment to which such information relates, such as that relating to the identification of rare species. **3.** The grounds for rejection shall be construed narrowly, taking into account the public interest in the disclosure of the information. In each case, the public interest in disclosing the information is weighed against the interest in the denial. Public authorities may not reject applications for information on emissions to the environment. **4.** Environmental information shall be provided in part when it is possible to separate information falling within the scope of paragraph 1 and 2 from the rest of the requested information. **5.** The refusal to provide, in whole or in part, the requested information is notified to the applicant, within the deadline of article 44 par. 3 indent a) or, as the case may be, indent b). The notification must state the reasons for the rejection and include information on the legal protection provided for in Article 47.

In the context of the application of the above-mentioned exceptions that limit in a restrictive way the field of rejection by the authorities of requests for the provision of environmental information, some interpretive difficulties have been identified. WWF Greece highlights two cases of rejection of its requests for environmental information related to the implementation of the Habitats Directive (92/43) and in particular: (1) Refusal of a request for data on protected area conservation zones on the grounds that the material was incomplete as it was



being “reprocessed” for future publication in a website. WWF Greece claimed that the material was complete and final and only the technical part of its reprocessing and remodeling for a website remained and therefore that the provisions of par. 3 of article 45 of PD 28/2015 were not applied. (2) Denial of a request for access to a public consultation report on the adoption of protected area conservation measures. WWF Greece claimed that the authority replied that (a) the comments were not public but private, a practice which, however, is inconsistent with the spirit of transparency that pervades the Convention and (b) the public consultation and its results are part of internal communications of said authority and that the report was not to be made public.

In both of the above cases, based on the claims of WWF Greece, a misinterpretation of the requirements of the Convention is demonstrated by the authorities according to which the environmental information is not limited to information gathered for the purpose of its future publication or to information that has already been made public.

56. According to article 46 of the same PD 28/2015: **1.** Access to public records or lists compiled in accordance with the provisions of article 44 par. 9 and the on-site examination of requested information is free. **2.** By joint decision of the Ministers of Environment and Energy and Finance it is possible to impose fees for the provision of environmental information. **3.** Where a fee is levied, the public authorities shall publish a list of such fees, as well as information on the circumstances in which a fee may be imposed.

57. Concerning relevant definitions in article 2 and the non-discrimination requirement in article 3, see information under article 5 of the Convention.

58. No particular difficulties concerning the definitions in article 2 and the interpretation of the definition "environmental information" were met. Limited difficulties were identified in some cases concerning the exceptions and in particular the identification of confidentiality of industrial information. A legal opinion of the State Council (no 135/2010) addressed this issue and concluded positively towards issuing copies.

59. According to Law 3422/12-12-2005 (OJG A 303/2005), public authorities, in response to a request of environmental information, make such information available to the public including, where requested, copies of the actual documentation containing such information. Article 7 of the JMD 11764/653/2006 (article 44 PD 28/2015) also stipulates that public authorities provide copies of the actual documentation upon request and some exceptions are provided concerning the form or format of the required information (see under art.4 para 1 (b)). Art. 5 of the Administrative Procedure Code (which was replaced by Article 59 Law 5143/2024), referring to access to documents, provides and regulates similar issues.

60. Law 4727/2020 (A'184) "Digital Governance (Incorporation of Directives (EU) 2016/2102 and 2019/1024), Electronic Communications (Incorporation of Directive (EU) 2018/1972" which replaced articles 1-37 of Law 3979/2011, defined: (a) general principles for the elaboration and implementation of the digital governance policy (article 3) (b) The right of public access to the information of public bodies, in the sense that the access of article 5 of the Civil Code extends to electronic documents and is practiced using Information and Communication Technology (ICT) (article 4) (c) The creation of digital governance services in Ministries. Where the right of access to electronic documents kept by a public sector agency of Article 5 of the Administrative Procedure Code is exercised, the document may be studied and copied with the use of ICT (article 9), (d) the process of providing and handling

electronic documents (article 22), (e) the process of submitting requests by the public through the Single Digital Portal of the Public Administration and the way of handling public and private documents (articles 28, 29) (f) The determination of the time of receipt of the requests and the calculation of the filing deadlines.

In particular, they are required to make easily accessible to all interested parties the key laws referring to their scope of authority and activities, information on their services and facilities, which are provided mainly with the use of ICT, as well as any other information, access to which will facilitate the exercise of the rights or the fulfilment of the obligations provided by the law. Public sector agencies shall make available the above-mentioned information in a format which permits further use and processing, with automated means. They are required, in particular, to make available at their websites, in a format permitting further use and processing, exemplars-texts of the applications, statements, declarations etc., irrespective of whether the relevant communication or interaction shall be carried out electronically or otherwise. Public sector agencies shall guarantee the validity and legality and shall ensure the quality and updating of the information and documents posted on their website or notified for posting on the Hellenic State's Central Web Portal or on the relevant accessible portal or site. Subject to the provisions on the protection of individuals from personal data processing (Law 4624/2019), the provisions on the protection of intellectual and industrial property and the provisions on the further use of information relating to the public sector, any information published, announced and notified in accordance with the provisions of this Article may be freely downloaded, acquired, stored, processed, disseminated and further used provided their source is clearly mentioned and it is not represented as original information, if it has been subjected to changes. Notice of the restrictions and terms of use of the information and documents posted must be clearly and conspicuously given in the public sector agency's website. Any amendments to the limitations and terms of use must be directly and easily recognizable. Public sector agencies must ensure that the information they hold is indexed and documented, and provide for directory, search and automated public sector information and documents.

61. According to article 26 of the national Climate Law 4936/2022, NECCA develops and maintains the forum for Climate dialogue ([climaregistry.necca.gov.gr](http://climaregistry.necca.gov.gr)) in which representatives of municipalities, regions, universities, environmental NGOs, businesses, professional organizations and trade unions can participate for the consultation on sectoral carbon budgets, the evaluation of the country's trajectory towards climate neutrality and the annual progress report on issues of mitigation and adaptation to climate change. The implementation of this article is in progress, i.e. at the stage of full implementation. Moreover, also implementing par.3d article 25 of the national Climate Law, general public can access climate adaptation information and climate projections data, with sections addressed to schools, companies, public bodies, under the Greek Climate Change Adaptation (GCCA) Hub that is established and financed within the framework of the integrated project "LIFE-IP AdaptInGR" (EU co-funded project) and developed by NECCA.

62. In Greece, access to environmental information of any person without having to state an interest, is provided first of all under law 3422/2005 (OJG A 303/2005). It is also ensured in article 3, paragraph 1 of JMD 11764/653/2006 (OJG B 327/2006), as incorporated with articles 42-49 of PD 28/2015, as already mentioned above.

63. Public Authorities, in their majority, make available environmental information held by or for them to any applicant upon request. However, due to lack of staff and workload, the

deadlines set by law are not always met. The common reported obstacle is the lack of human and other resources. If a request is formulated in a too general manner, the public authority asks the applicant to specify the request.

64. If the information requested is not held by the public authority to which the request is addressed, the public authority transfers it to the competent authority usually, but not always, within 3 days, due to limited human resources, and informs the applicant accordingly.

65. According to the Constitution (Article 10), the competent authority is obliged to reply to requests for information and to issue documents (see art. 3). According to article 59 of Law 5143/2024 (by which article 5 of Law 2690/1999 -Administrative Procedure Code- was replaced), as mentioned above, every interested person is entitled to access to administrative documents by submitting a request. Directives (EU) 2016/2102 and 2019/1024 on the re-use of public sector information has been incorporated into the Greek legislation by Law 4727/2020, as mentioned in paragraph 60 above. Additionally, Directive 2013/37/EC amending Directive 2003/98/EC on the re-use of public sector information has been incorporated into the Greek Legislation by Law 4305/2014, which stipulates open access to data published by the public sector. However, the provisions of this Law were replaced by the relevant provisions of Law 4727/2020, the content of which is referred to in paragraph 60. In the context of the implementation of this Law, MoEE issues implementing regulations. Data sets are available on <http://www.data.gov.gr/>.

66. Taking into account those referred to in the above point (under art. 4, para. 1) and according to article 4, paragraph. 1 (b), subparagraphs (i) and (ii) of the Convention, ratified by law 3422/2005 and article 3, paragraph 7 of the JMD 11764/653/2006, the form or the format of the information is supplied as follows: where an applicant requests a public authority to make environmental information available in a specific form or format (including in the form of copies), the public authority makes it available unless it is already publicly available in another form or format which is easily accessible to the applicants. Further details on the above issue are regulated under the above JMD (art. 3, para. 7).

67. Additionally, according to article 25 of Law 3979/2011 (OJG 138A/16.6.2011) and article 4 of PD 28/2015 (OJG34A/23-03-2015): 1. Public sector agencies may disclose documents to natural persons or private law entities with the use of ICT, if the latter have suggested this medium or have consented to its use. Both the request or suggestion of the preferred electronic medium and the relevant consent may be transmitted and sent, in any case, with the use of ICT, provided all the identity confirmation and authentication conditions are met. 2. The notification system must permit the verification of the exact time at which transmission, receipt and access to the document took place, which results in the commencement of the legal effects and the running of the relevant time limits, such as these pertaining to the exercise of legal remedies and appeals. It is presumed that the recipient of the document shall have access to the contents of the notification at the latest ten full days from the date of the notification, unless the recipient can prove the presence of an event of force majeure which prevented access to the document, or if such failure was due to reasons attributable to the public sector agency. 3. Electronic access by the party concerned to the contents of the public sector agency's actions and relevant documents shall be equivalent to notification, provided that the public sector agency can prove that the said party has indeed gained access.

ENGLISH:

## 8 Obstacles encountered in the implementation of article 4.

*Describe any obstacles encountered in the implementation of any of the paragraphs of article 4.*

*Year: 2025*

68. The obstacles and problems identified are:

- a) Lack of resources (staff, funds etc.) and technical infrastructure.
- b) In some cases, the request is too general and officials need to ask and assist the applicant to specify it or submit documentation with more details.
- c) Delays due to the complexity of the requested information, requiring time and collaboration with other competent authorities.
- d) According to some Regions, there is a need for more effective coordination between government agencies and services, as well as a need for further interoperability between databases and/or registries with environmental information.
- e) Limited difficulties concerning the interpretation and management of the definition "environmental information".
- f) Lack of legal Services, in the case of some local authorities, in order to efficiently assess whether the information requested can indeed be provided or it falls under the scope of commercial or industrial property rights and is, thus, confidential.
- g) Distance of the competent authority from the place of residence of the citizen, (in case no database is available).
- h) According to the Greek Ombudsman, in some cases the public does not know what information is available as well as the competent services which are responsible to provide such information. Moreover, public services often put forward the personal data protection provisions as an argument in order to avoid providing the requested information. In addition, sometimes public authorities abusively delay the granting and finally the rejection of the request, violating the deadline of the article 4 § 7 of the Convention, without stating the reasons justifying the delay.
- i) According to Greek Ombudsman, in some cases there is not further classification and specification of information. This gap leads to additional administrative barriers for the citizens.
- j) According to the Greek Ombudsman, there is a need for construction of a Monitoring Information System which will ensure the transparency and immediacy.
- k) As an NGO claims, despite all efforts, there are still instances of non-implementation of article 4.1.a, from a particular public legal entity which refuses to turn over environmental information without an interest stated, and it uses for this purpose a form to inform the public.
- l) According to an NGO, despite progress, environmental information in Greece remains scattered, is not consistent or complete and is not updated regularly. Indicatively, while a central open data portal has been set up (<https://data.gov.gr/>), when filtering environmental information, only limited data sets are provided.

ENGLISH:

## 9 Further information on the practical application of the provisions of article 4.

*Provide further information on the practical application of the provisions on access to information in article 4, e.g., are there any statistics available on the number of requests made, the number of refusals and the reasons for such refusals?*

*Year: 2025*

69. Upon application, the Directorate of Environmental Licensing and the other competent departments of MoEE provide in due time the information requested concerning official documents or other documentation concerning the files on environmental impact assessment (EIA) and strategic environmental assessment (SEA) submitted to it, as soon as the public participation process has begun. No internal consultation document concerning open judicial procedures is provided.

70. The General Secretariat for Natural Environment and Water (GSNEW) has the responsibility for the operation, management and updating of national databases concerning water quality and quantity characteristics, the collection of available flood event log data, the development of Areas of Potential High Flood Risk, Flood Hazard Maps and Flood Risk Maps, the operation of the National Registry for Water Abstraction Points and the monitoring Programme of Bathing Water Quality, in cooperation with the competent authorities. The National Network for Monitoring the qualitative and quantitative characteristics of waters in accordance with the requirements of the Framework Directive 2000/60 and Directives 91/676/EC (nitrogen pollution from agricultural sources), 2006/118/EC (groundwater protection) and 2008/105/EC (priority substances) is particularly mentioned. The aim of this National Network is to assess/classify the qualitative (ecological and chemical) and quantitative status of waters in order to protect and restore the country's water systems in accordance with the River Basin Management Plans.

The General Secretariat for Waste Management Coordination is responsible for the operation of the National Wastewater Treatment Plants Database, in coordination and cooperation with the competent bodies. Also, within the framework of the implementation of EU Regulation 2020/741 (reuse of treated urban wastewater in agriculture) the above General Secretariat is responsible for creating a database where all permits for reclaimed water production facilities as well as permits for the supply and use of reclaimed water in agriculture are registered.

71. In 2023, the Ministry of Health issued MD Δ1(δ)/ΓΠ οικ. 27829/15-05-2023 on the quality of water for human consumption in compliance with the provisions of Directive (EU) 2020/2184. According to the provisions of Article 17 of the MD, the responsible water supply operators are obliged to provide consumers with updated information on water for human consumption. Water supply undertakings shall ensure that all persons to whom water intended for human consumption is supplied receive this information regularly, and at least once a year, without having to request it, and in the most appropriate and accessible format (e.g. through their bill or by digital means).

ENGLISH:

## 10 Website addresses relevant to the implementation of article 4.

*Give relevant website addresses, if available:*

*Year: 2025*

<https://ypen.gov.gr> - MoEE

<http://www.mfa.gr> - Ministry of Foreign Affairs

<https://www.ynanp.gr> - Ministry of Maritime Affairs and Insular Policy

<http://www.minedu.gov.gr/> - Ministry of Education, Religious Affairs and Sports

[https://joinup.ec.europa.eu/sites/default/files/ckeditor\\_files/files/eGovernment%20in%20Greece%20-%20February%202016%20-%20v%2018\\_0\\_2\\_00.pdf](https://joinup.ec.europa.eu/sites/default/files/ckeditor_files/files/eGovernment%20in%20Greece%20-%20February%202016%20-%20v%2018_0_2_00.pdf) - eGovernment in Greece

<https://climaregistry.necca.gov.gr/> - Climate Action and Sustainability Portal

<https://adaptivegreecehub.gr/> - Climate Change Adaptation Hub

ENGLISH:

## 11 Legislative, regulatory and other measures implementing the provisions on the collection and dissemination of environmental information in article 5.

*List legislative, regulatory and other measures that implement the provisions on the collection and dissemination of environmental information in article 5. Explain how each paragraph of article 5 has been implemented. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9. Also, and in particular, describe: (a) With respect to paragraph 1, measures taken to ensure that: (i) Public authorities possess and update environmental information; (ii) There is an adequate flow of information to public authorities; (iii) In emergencies, appropriate information is disseminated immediately and without delay; (b) With respect to paragraph 2, measures taken to ensure that the way in which public authorities make environmental information available to the public is transparent and that environmental information is effectively accessible; (c) With respect to paragraph 3, measures taken to ensure that environmental information progressively becomes available in electronic databases which are easily accessible to the public through public telecommunications networks; (d) With respect to paragraph 4, measures taken to publish and disseminate national reports on the state of the environment; (e) Measures taken to disseminate the information referred to in paragraph 5; (f) With respect to paragraph 6, measures taken to encourage operators whose activities have a significant impact on the environment to inform the public regularly of the environmental impact of their activities and products; (g) Measures taken to publish and provide information as required in paragraph 7; (h) With respect to paragraph 8, measures taken to develop mechanisms with a view to ensuring that sufficient product information is made available to the public; (i) With respect to paragraph 9, measures taken to establish a nationwide system of pollution inventories or registers.*



*Year: 2025*

72. Law 3422/2005, by which the Convention was ratified, article 7 of JMD 11764/653/2006 (OJG B 327/17-3-2006) and article 48 of PD 28/2015, which transposed Directive 2003/4/EC, also regulate the dissemination of environmental information through electronic databases and public telecommunication networks. Also, with Law 4727/2020, the previously applicable legislation (Law 3979/2011) regarding the regime for the disclosure of information held by public authorities was improved and modernized.

73. In addition, Article 5 (a) paragraphs 1 and 2 of the Constitution, all persons are entitled to information, as specified by law and all persons are entitled to participate in the Information Society. In addition, by Law 3304/2005, as amended by law 4443/2016, EC Directives 2000/78 and 2000/43 "for the promotion of the principle of equal treatment and the fight against discrimination on grounds of race, nationality, religion or belief, disability, age, sexual orientation" were transposed into the Greek legislation.

74. In particular, according to Article 7 of JMD 11764/653/2006 (Article 48 of PD 28/2015) "Dissemination of environmental information": **1.** Public authorities organize the environmental information of their competence, for the purpose of its systematic dissemination, in particular by means of computer communications technology and/or electronic technology. Environmental information is gradually becoming available in electronic databases that are easily accessible to the public. **2.** Information is updated on a case-by-case basis and includes at least: (a) the texts of international treaties, conventions or agreements and the laws by which they have been ratified, as well as the texts of national and Community legislation; (b) policies, plans and programs relating to the environment; (c) progress reports on the implementation of the information referred to in points (a) and (b); (d) reports on the state of the environment; (e) data or summaries of data resulting from the control of activities that affect or may affect the environment; (f) decisions approving environmental conditions and environmental agreements; (g) environmental impact studies and environmental risk assessments. **3.** Without prejudice to specific reporting obligations under national and Community law, public authorities shall ensure that, at regular intervals not exceeding four years, national and, where appropriate, regional or local reports on the state of the environment are submitted. **4.** In the event of an imminent threat to human life or the environment due to human activities or natural causes, all information held by public authorities or which could enable the affected public to take action to prevent or limit damage from that threat, is disseminated promptly and without delay. **5.** Public authorities may establish links to Internet sites where information can be searched.

75. According to article 8 of JMD 11764/653/2006 (Article 49 of PD 28/2015 on quality of environmental information): **1.** Public authorities must ensure, as far as possible, that the information collected is up to date, accurate and comparable. **2.** Public authorities shall respond to requests for information, indicating to the applicant where information can be found, and the procedures used to collect the requested information.

76. There are also two bodies in Greece with similar responsibilities both assigned with combating discrimination in the private sector: The Labor Inspectorate, whose competence covers ordinary employment contracts and the Equal Treatment Committee of the Ministry of Justice (Law 3304/2006, OJG A' 16) whose competence covers the rest of the private and public sector. The General Secretariat for Equality of the Ministry of Interior also plays an important role in the implementation of the principle of equal treatment and gender equality.



At the same time, a Permanent Committee on Equality and on Human Rights as well as a Permanent Committee on Institutions and on Transparency operates in the Greek Parliament.

Article 5, paragraph 1 (a)

77. Data processing systems are operated by various environmental and sectoral authorities. The MoEE supervises the collection and publication of core environmental data and also contributes regularly to the European Environment Information and Observation Network (EIONET) Priority Data Flows. Additionally, the MoEE cooperates closely with the Hellenic Statistical Authority on environmental monitoring data, which collaborates with Eurostat and the European Commission, as well as with the National Statistical Institutes of other EU Member States (MoEE, according to Law 3832/2010 and Decision 12629/ 82-896/2014 of the Greek Statistical Authority, constitutes a National Authority of the Greek Statistical System).

78. The MoEE also ensures collection and update of environmental data through: 1. Air-quality monitoring, 2. Air emissions monitoring (main industrial installations emissions), 3. Combustion and fuel monitoring Programmes, 4. The Electronic Waste Registry where all licensed parties (including municipalities and waste management bodies) involved in waste production and management submit annual reports on their waste production, storage, treatment, and transport activities, 5. Noise monitoring, 6. Environmental inspectorate monitoring, 7. Air emissions trade registry, 8. Monitoring the use and emissions of fluorinated greenhouse gases under Regulation (EU) 517/2014 and substances that deplete the ozone layer under Regulation (EC) 1005/2009, from Companies that produce, recover, recycle, import and place on the market fluorinated gases, 9. Operation of the National Water Monitoring Network (as mentioned above in paragraph 70), 10. Monitoring of Bathing Water Quality Programme, in cooperation with the competent authorities, 11. Operation and Updating of the Hydrological and Meteorological Information National Bank, 12. Operation of the National Wastewater Treatment Plants Database, in coordination and cooperation with the competent bodies, 13. Collection of available flood events data (historical floods) at country level, 14. Development of Areas of Potential High Flood Risk, as well as of Flood Hazard Maps and Flood Risk Maps at country level, 15. Operation of Water Abstraction Points National Register Database. The information is available on MoEE official site.

The Water Directorates of the Decentralised Administrations send to the MoEE and also provide the public with information on issues such as: water abstraction projects, implementation of the licensing system for water use and for issues related to the implementation of the river basin management plans and the programs of measures for their protection, bathing water quality, etc. concerning their area of responsibility.

79. A specific digital service providing administrative direct access to environmental, social and economic outcomes of the extractive activities (<https://e-deltia-opy.gov.gr/>) was established by a Ministerial Decision of MoEE (Gov. Gaz. B' 2063/2023, article 10).

80. Hellenic Survey of Geology and Mineral Exploration (HSGME) is a Legal Entity of Private Law, supervised by the MoEE, and is the official Government advisor on geo-science, minerals and energy raw materials.

81. HSGME diffuses information through:

- its website,
- thematic workshops,
- announcements in reputable journals of scientific results,
- participation in scientific conferences,
- provision of information to local government bodies,
- digital & printed distribution of the respective deliverables through its library,
- submitting the annual results reports to the Ministry,
- press releases.

82. A number of databases have been created in the framework of various national and / or European programs. HSGME's database was designed to include a complete description in the form of summary mineral data, laboratory study data, mineral enrichment studies, field research, stocks, economic and technical data, exploitation data, environmental impact data from the exploitation, etc.

83. The Green Fund (established by Law 3889/2010 as amended by Law 4964/2022), as the competent body for the administration, management and exploitation of green resources, publishes on its official website ([www.prasinotameio.gr](http://www.prasinotameio.gr)) detailed information on the financial management of green resources and in particular its actions regarding the managerial, economic, technical and financial support of programs and measures aimed at the promotion and restoration of the environment and the tackling of climate change, including Calls for Proposals for Green Fund Financial Programs. Additionally, the Green Fund, as a co-beneficiary of LIFE projects, enables citizens to download documents and deliverables of specific projects through their websites. Examples of current projects, for which information is published, are the following: LIFE-IP 4 NATURA, LIFE-IP AdaptInGR, LIFE-IP CEI-Greece, LIFE GRECABAT, LIFE PROWhIBIT, LIFEPROFILE, LIFE EL BIOS, LIFE21-CAP-EL-GRLTF plus/101101858.

84. The General Chemical State Laboratory (GCSL), the official state body for carrying out chemical, physical, microbiological, organoleptic and other laboratory tests as well as for conducting relevant controls, publishes the results of the analyses it conducts, (such as analyses of water quality, waste and other environmental samples). The results are available in form of an annual work report on GCSL's official web site (<http://www.gcsl.gr>).

85. Regarding water for human consumption, in accordance with the provisions of Article 18 of the JMD Δ1(δ)/ΓΠ οικ. 27829/15-05-2023 (B' 3525), incorporating (EU) Directive 2020/2184, the Ministries of Health, Interior, Labour and Social Affairs and Environment and Energy create data sets related to their competence. In particular:

The Ministry of Health shall create and update datasets containing: information on the risk assessment of domestic distribution systems, the results of monitoring in cases where the parametric values set out in Annex I Parts A and B are exceeded and information on the corrective actions taken, information on incidents involving water intended for human consumption which have caused a potential risk to human health, and information on all derogations granted under par. 1 of Article 15.

The Ministry of the Environment shall, by July 2027, establish and update every six years thereafter a dataset containing information on risk management of catchment areas of water abstraction points.

The Ministry of the Interior, in cooperation with the Ministry of Labour and Social Affairs, shall, by January 2029 create and update every six years thereafter a dataset containing information on measures taken by municipalities and water supply operators to improve access to water for human consumption and on the percentage of their population with access to water for human consumption.

The Ministry of Health is taking all necessary actions to ensure that the European Commission, the European Environment Agency and the European Centre for Disease Prevention and Control have access to these datasets.

#### Article 5, paragraph 1 (b)

86. Greece contributes to the preparation of the State of the Environment Report of the European Environment Agency (EEA), published every 5 years.

87. A broad range of environmental information is provided by the MoEE portal (<https://ypen.gov.gr/>), which includes links, on its initial webpage, for all environmental information produced by the services of the Ministry (air, climate, water, natural sites and landscape, forests, biodiversity, energy efficiency, waste management, environment licensing etc.), including geospatial information under the INSPIRE Directive, as well as links for public consultation procedures.

88. Environmental data is collected and processed in compliance with the EU legislation and in accordance with the environmental reporting obligations and specifications of EEA and Eurostat.

#### Article 5, paragraph 1 (c)

89. In case of an air pollution incident, information is disseminated on an hourly basis through the Internet, radio, TV messages and the Website of the Ministry, as well as implementation of relevant measures (directions to people affected etc.). According to an NGO, there is a need for more systematic, real-time air pollution monitoring in all areas of Greece.

90. Polluters have an obligation to directly inform the public in emergencies, according to the PD 148/2009 "Environmental responsibility to prevent and repair damage to the environment: in compliance with the 2004/35/EC Directive".

91. According to Article 10 of Directive 2007/60/EC on the "Assessment and management of Flood Risks" and Article 9 of the JMD 31822/1542/E103 (OJG 1108/B/21-07-2010), which incorporated into national law the EU Directive, the Preliminary Flood Risk Assessments for the 14 Water Districts were disclosed and a list of stakeholders at all stages of risk and disaster management (Prevention, Protection, Preparedness, Recovery and Review) was determined.

92. Forecasting and early warning is handled in Greece by several operational centres. Comprehensive activities and plans that have been undertaken in this field include:

- (a) Traditional measuring instruments, radar and numerical weather forecasts.
- (b) Identification and mapping of high-risk areas through the National Bank of Hydrological and Meteorological Information, a data bank in which all the hydrological and meteorological data measured during the last 100 years have been collected and elaborated, using the most up-to-date computer science and telecommunications.
- (c) Development of an effective and reliable early-warning and forecasting system, supported by meteorological information, to inform, at the respective level, flood authorities and citizens in threatened areas.
- (d) A national emergency plan for civil protection, covering the emergency management before, during and after flood events. According to an NGO there is a lack of evaluation reports with post emergency information.
- (e) The single European Emergency Number 112 is an integrated communications service that provides the option to send mass alerts to citizens, accompanied by an alarm sound, in cases where a natural disaster or a dangerous situation which could threaten their life, health or safety (e.g. floods, wildfires, etc.), is expected or is in progress. In these cases, citizens receive alerts with protection guidelines and instructions, through various communication channels. The Ministry of Climate Crisis and Civil Protection, (the General Secretariat for Civil Protection), established by Presidential Decree 70/2021, is responsible for the management and operation of the 112 service.
- (f) In cases of a public health threat concerning fishery products, all competent Regional Fisheries Services, Veterinary and Public Health Services as well as the fishing operators in the region are subsequently informed.
- (g) Monitoring the quality of water systems, and monitoring and protection of bathing waters and the marine environment.

#### Article 5, paragraph 2

93. The publication of the Environmental Impact Study of projects and activities is envisaged in article 4 paragraph 3c in conjunction with articles 19 and 19a of Law 4014/2011 (OJG 209 A) on Environmental licensing of projects and activities, as amended by Law 4685/2020 (OJG 92).

94. The quality of bathing waters in Greece is systematically monitored since 1988 according to Directive 76/160/EEC under a Programme coordinated by the MoEE. Since 2010, the quality of bathing water is monitored in accordance with Directive 2006/7/EC as transposed to Greek legislation by JMD 8600/416/E103/2009 (OJG 356V/2009) in the context of the Country's Monitoring Programme for bathing water quality. This Programme aims to protect the marine environment and public health as well as to identify problem areas, in order to take appropriate measures. The results of the Programme are made public to inform both Greek citizens, and the EU member states on the quality of bathing waters. Based on the results, bathing waters are evaluated and classified and quality status thereof is determined. An annual report is drafted to inform the relevant departments, agencies and the public. This report is submitted no later than December 31 of each year to the [Central Data Repository of the European Environment Agency](#).

### Article 5, paragraph 3

95. MoEE has established relevant databases with data from the respective monitoring systems and registers as well as information on relevant activities. Part of the above is being displayed on the MoEE website. The final objective is to gradually include all necessary data and information.

(a) All information and data related to River Basin Management Plans are open, online and freely accessible to all. They are also submitted to EU through the Water Information System for Europe (WISE) platform. The official website of MoEE, in the thematic category Water Resources, provides information on water related issues (e.g. Water Resources Management, Water Framework Directive, Nitrates Monitoring Programme, Flood Risk Management, Bathing Waters, Marine Strategy, International and Mediterranean Issues, River Basin Management Plans). Moreover, in the MoEE website, the following web pages contain data and information for the immediate notification of bodies and public:

- Bathing Water Profiles (<http://bathingwaterprofiles.gr>): It provides information about the quality of bathing waters in Greece and serves as a Register. It's aim is to describe the basic characteristics of the coasts, identify the pollution sources and assess the magnitude of the effects. It also serves as a guide for selecting appropriate measures to be taken. The website is interactive, aiming not only at informing the public but also at accommodating comments by the website visitors.
- Preliminary Flood Risk Assessment (<http://floods.ypeka.gr>)
- National Water Monitoring Network (<http://nmwn.ypeka.gr>)
- River Basin Management Plans (<http://wfdver.ypeka.gr>)
- Flood Risk Management Plans, Flood Hazard Maps and Flood Risk Maps (<http://floods.ypeka.gr>)
- Marine Strategy Framework Directive (<https://msfd.hcmr.gr/>)

(b) Urban Wastewater Management, including the production and use in agriculture of treated urban wastewater is provided through the website "National Wastewater Database" (<http://astikalimata.ypeka.gr>) maintained by the General Secretariat for Waste Management Coordination.

(c) National Geospatial Information Infrastructure (Law 3882/2010 for the transposition of Directive 2007/2/EC - INSPIRE). The INSPIRE Directive is implemented through the MoEE's website <http://geoportal.yper.gr>, which hosts 57 environmental data sets (part of European Commission's priority datasets, metadata of the datasets, and the services and the discovery service are provided according to the INSPIRE specifications).

(d) The MoEE, through the <http://aepe.ypeka.gr> website, provides access to Environmental Permitting.

(e) The Digital Environmental Registry (DER) (<https://eprm.yper.gr/>), as an operational permitting tool developed by the MoEE, enables the online submission of Environmental Impact Studies for activities that belong to the A1 and A2 categories, as well as the monitoring of the process of issuing, renewal or amendment of the Environmental Conditions Approving Decisions and the Standard Environmental Commitments. DER optimizes the

environmental permitting processes by transforming the licensing status in a fully digital process and workflow-based platform.

(f) The [www.latomet.gr](http://www.latomet.gr) website gives free access to geographic information of mining and quarrying active sites. Open GIS data, annually updated, include: (i) State-owned mining areas, (ii) Marble, Aggregates, Industrial minerals active areas, (iii) geothermal sites, (<http://www.latomet.gr/ypan/StaticPage1.aspx?pagenb=16515>).

(g) According to Law 2204/1994 - OJG 59/A/15-4-1994 (Article 26), by which Greece ratified the UN Convention on Biological Diversity (CBD), the MoEE submits reports to the Conference of the Parties, at intervals determined by it, on the measures taken at national level to implement the provisions of the Convention and on their effectiveness in achieving its objectives. The reports can be found on the CBD website (<https://www.cbd.int/reports>).

96. The Executive Structure for European Structural Investment funds of the MoEE (EYSPED) is the Managing Authority for the European Economic Area (EEA) Grants Water Management Programme, which funds projects in the water sector. Also, EYSPED works as Project promoter for some environmental studies for the MoEE. EYSPED follows the publicity rules of the European Structural and Investment (ESI) funds regulation and the EEA Grants regulation. All procedures and information on the projects selected are available in the EYSPED website ([www.eysped.gr](http://www.eysped.gr)). Moreover, all the EEA grants projects have their dedicated website, connected to the EYSPED site. EYSPED and Project Promoters are also organising publicity events. The ESI funds Publicity guide in Greece can be found at: <https://www.espa.gr/el/Pages/elibraryFS.aspx?item=2574>.

97. Information about the OP Competitiveness, Entrepreneurship and Innovation, annual reports, invitations, notices announcements as well as environmental legislation are published on the website <https://www.espa.gr/el/pages/staticOPInfrastructureEnvironment.aspx>.

98. The Ministry of Foreign Affairs, in the context of managing Greece's relations with the OECD Development Assistance Committee, maintains the official statistical database on the development assistance provided by Greece and sends detailed statistical data to the Committee .

99. The Marine Environment Protection Directorate of the Ministry of Maritime Affairs and Insular Policy/ Hellenic Coast Guard Headquarters issues on a yearly basis statistical data regarding the administrative sanctions imposed for marine environment protection. This data is publicly available on the websites of the Ministry of Maritime Affairs and Insular Policy ([www.ynanp.gr](http://www.ynanp.gr)) and of the Hellenic Coast Guard ([www.hcg.gr](http://www.hcg.gr)).

100. Information such as the daily wildfire danger prevention map is provided in realtime mode by the General Secretariat for Civil Protection.

101. Since 1 October 2010, all Ministries are obliged to upload their decisions on the “Diavgeia” (Transparency) Program, to ensure transparency and to establish responsibility and accountability of public entities (see information under Article 3).

102. The National Portal “Ermis” is the Governmental Portal of Public Administration aiming to inform citizens and businesses and ensure the safe use of eGovernment services



through digital certificates. The portal provides completed briefing to citizens and businesses regarding their transactions with the Public Administration.

103. Individuals, professionals and public servants who need to find useful information, such as supporting documents, steps, time and cost of implementation on any environment-related administrative procedure, such as Approval of Environmental Terms and Conditions and Standard Environmental Commitments, can visit the website of the National Registry of Administrative Public Services (MITOS) [https://en.mitos.gov.gr/index.php/Main\\_Page](https://en.mitos.gov.gr/index.php/Main_Page), the official registry of administrative procedures of the Greek Public Sector.

104. “Opengov.gr” is a portal dedicated to responding to citizens' needs for information, merit and participation in draft legislation. The portal is designed to serve the principles of transparency, deliberation, collaboration and accountability.

105. The National Printing House (also described under Article 3) is the public service for the dissemination of Greek law, responsible for publishing and distributing the Official Journal. The Official Journal publishes laws, presidential decrees, regulatory acts, communications, acts of the Ministerial Council etc.

106. Through the website of the Hellenic Parliament (<https://www.hellenicparliament.gr>), the public is informed about the draft laws that have been submitted to it, after the consultation process, about their regulatory impact assessment, as well as about the parliamentary progress of the draft laws until their adoption.

107. The Natural Environment and Climate Change Agency (NECCA) publishes online the Red List of Threatened Species of Plants, Animals and Fungi of Greece (<https://redlist.necca.gov.gr/>). According to an NGO, it facilitates access and makes the updating easier, than the previous book versions (2009 editions). Similarly, the implementation of the LIFE EL-BIOS project (<https://biodiversity-greece.gr/en/>) is expected to lead to an up-to-date and reliable information system on Greece's biodiversity and nature.

108. The MoEE has also set up the “F-GASES and ODS Electronic Database” in the framework of Regulation (EU) 517/2014 and Regulation (EC) 1005/2009, according to the MD 85858/2124/2021 (article 13), for the purpose of monitoring the use and emissions of fluorinated greenhouse gases and ozone-depleting substances.

#### Article 5, paragraph 4

109. Various Reports submitted to the EU following relevant reporting obligations, on the basis of respective national laws (EC Directives transposed in the Greek legislation, ratified international environmental Conventions and multilateral agreements) are posted on the official website of the MoEE on a regular basis.

110. The General Directorate for Forests is keeping updated a legal data basis on CITES Convention (Law 3208/2003, OJG A 303) on the official website of MoEE and is organizing seminars and trainings for school students on the creation of a forest friendly spirit.



111. The General Directorate of Inspectorate of MoEE prepares on an annual basis a Progress Report and provides the public with the main information concerning the work of inspections on the implementation of environmental, energy and mining legislation, as well as on the legislation combating unauthorised construction and the implementation of environmental responsibility.

112. Annual reports regarding waste management of products that fall under the scope of Extended Producer's Responsibility are available at the Hellenic Recycling Agency's website.

113. Periodic reports including environmental data and any proposed protection measures are also posted on regional authorities' websites.

#### Article 5, paragraph 5

114. See above under article 5, paragraphs 1 to 4. Article 5, paragraph 6.

115. To facilitate public access to environmental information, the EMAS official website is regularly updated and the EMAS register was redesigned in September 2012 to provide additional information for all registered organisations and sites, as well as all the environmental statements available in electronic format of the EMAS registered organisations (even multiple versions for previous years).

116. The European ecolabel has been awarded to detergent products, paints and varnishes products and hotels. The aforementioned licenses have been issued by the National Competent Body - the Hellenic Council for EU Ecolabel Awards - ESAOS, which has been established at the MoEE.

117. As far as Green Public Procurement (GGP) issues are concerned, in 2021 the National Plan for Green Public Procurement was approved, in implementation of article 5 of law 4736/2020, with the aim of including environmental parameters in the conclusion of public contracts by contracting authorities. This Plan sets quantitative targets for the execution of public contracts. In particular, it contains an assessment of the existing situation regarding public procurement in Greece, setting targets and specifying the measures to be taken, with a time horizon of three years. It also includes awareness-raising, information and training actions for the economic operators involved.

#### Article 5, paragraph 6

118. Ministerial Decision OJG B' 2063/2023 contains provisions (article 5) to encourage mine and quarry operators to inform the public authorities about their updated environmental obligations (e.g. annual expenditure, area of the remediated area, extractive waste quantities, waste management etc.).

#### Article 5, paragraph 7

119. Selected data from databases of the above-mentioned environmental fields (air quality, air emissions, water quality and quantity, industry, emissions from stationary combustion sources installations and vehicles, fuel, waste, noise) is published on the MoEE website. Furthermore, regulations, circulars, general or regional emergency plans and guiding documents regarding the environment are published or/and are provided upon request.

120. The Directorate General of Mineral Raw Materials of the MoEE publishes, in the second half of each year, a report about mining, quarrying and geothermal activity. The report includes: (a) production, employment and financial data, (b) information on the environmental impact and actions, as provided by mining and quarrying operators; (c) information on safety, accidents occurring, ex-ante checks carried out and fines imposed, as obtained from the competent Mining Inspection Department and Energy; (d) updated national legislative database for raw materials and geothermal energy. Annual reports are available on [www.latomet.gr](http://www.latomet.gr).

#### Article 5, paragraph 8

121. The Cartagena Protocol on Biosafety to the Convention on Biological Diversity (CBD), which is accompanied by a Biosafety Clearinghouse (BCH), is ratified by Greece by Law 3233/2004 (GG OJG 51/A/18.2.2004) and a National Focal Point (NFP) for both the Protocol and its BCH was nominated. The protocol aims to ensure the safe handling, transport and use of living modified organisms (LMOs) resulting from modern biotechnology that may have adverse effects on biological diversity, and on human health. The BCH is a mechanism set up by the Cartagena Protocol to facilitate the exchange of information on LMOs and global access to a variety of scientific, technical, environmental, legal and capacity building information.

Furthermore, the Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization to the CBD was ratified by Greece by Law 4617/2019 (GG OJG 88/A/10.6.2019). The Access and Benefit-sharing Clearinghouse (ABS Clearing-House) is a platform for exchanging information on access and benefit-sharing established by Article 14 of the Protocol, as part of the Clearinghouse of the Convention (article 18, par.3 of the Convention). The ABS Clearing-House is a key tool to enhance legal certainty and transparency on procedures for access and benefit-sharing, and for monitoring the utilization of genetic resources, through the internationally recognized certificate of compliance.

At the same time, in the context of the implementation of Regulation (EU) 511/2014, which corresponds to the Nagoya Protocol, Greece has issued the JMD YPEN/DDED/24248/598/2019 (B'1026/2019), which established a "National Register of Genetic Resources Users" with the aim of evaluating the implementation of the Regulation in the country. This Register is interconnected with the registers of controls and remedial measures of all public authorities involved as well as with other relevant databases.

## Article 5, paragraph 9

122. The Climate Change Directorate of MoEE established and maintains a greenhouse gas emission allowance trading registry for the holding, transfer and cancellation of the GHG emissions' trading allowances (JMD 54409/2632/27-12-2004, OJG B 1931, which was replaced by JMD 181478/965/2017 - transposition of Directive 2003/87/EC as amended by subsequent relevant Directives). The registry is accessible to users through: <http://ec.europa.eu/environment/ets/account.do>. Relevant information is also available on the MoEE website.

123. Moreover, through the MoEE website:

- The public is informed about the national climate reports that Greece submits to the European Commission and the Secretariat of the United Nations Framework Convention on Climate Change (UNFCCC) [<https://ypen.gov.gr/perivallon/klimatiki-allagi/ektheseis-kai-yfistameni-katastasi/>].
- The public has access to the national greenhouse gas emission inventories submitted by Greece to the UNFCCC from 2005 to date [<https://ypen.gov.gr/perivallon/klimatiki-allagi/ektheseis-kai-yfistameni-katastasi/etisies-ethnikes-apografes-aerion-tou-thermokiouath-apo-to-2005/>].
- The public is informed in relation to the adopted National Strategy for Adaptation to Climate Change [<https://ypen.gov.gr/perivallon/klimatiki-allagi/prosarmogi-stin-klimatiki-allagi/>].

Through the Geospatial Information Portal of the MoEE established by Law 3882/2010 (incorporation of Directive 2007/2/EC - INSPIRE Directive), in the Climate Change section, the public can access geospatial maps of future climate projections for 22 climate indicators for 3 IPCC greenhouse gas emission scenarios (RCP 2.6, RCP 4.5 and RCP 8.5) and for 2 future periods 2031-2060 (near future) and 2071-2100 (far future) [[http://mapsportal.ypen.gr/thema\\_climatechange](http://mapsportal.ypen.gr/thema_climatechange)].

In the framework of the implementation of the provisions of the National Climate Law:

- Documents of instructions and guidelines are posted on the MoEE website, to be publicly accessible to all interested parties (local authorities, businesses, the public) [<https://ypen.gov.gr/perivallon/klimatiki-allagi/ethnikos-klimatikos-nomos/efarmogi-ethnikou-klimatikou-nomou/>].
- Information workshops were held by the Directorate of Climate Change and Air Quality, aimed at local authorities and businesses.

124. In the framework of Directive 96/61/EC concerning integrated pollution prevention and control (IPPC), and the European Pollutant Emission Register (EPER), reports with statistical and inventory data were drafted.

ENGLISH:

## 12 Obstacles encountered in the implementation of article 5.

*Describe any obstacles encountered in the implementation of any of the paragraphs of article 5.*

*Year: 2025*

125. Possible problems may occur from:

- Delayed flow of information to the central administration.
- Delays in rendering of reports and data to the public.
- Lack of staff and resources.
- Not systematically kept records by some Authorities.
- Legal Complexity.
- Misunderstanding as far as the rights of the public is concerned as well as the obligations of public servants- Interoperability difficulties between public services.
- Lack of catalogue for all environmental data sources / Lack of dissemination of online platforms to the public.
- Lack of geospatial information on extractive raw material permits.

126. Other problems are as follows:

In some cases, more than one environmental databases are available for the same region with differentiated inputs. Additionally, relevant databases in some cases are seldom interconnected.

There are several quality controls on the data produced, in accordance with the technical specifications of each program. However, in some cases the databases as well as the environmental data are not regularly updated, nor is there an established mechanism to determine the need for revision and thus the implementation of the INSPIRE Directive becomes ineffective.

According to the Greek Ombudsman, information in public sector databases is often summarized, without further analysis. Thus, citizens need to further appeal to the responsible public service.

According to NGOs, studies of environmental interest conducted by regulated entities such as public institutes and universities upon administrative request are not always published.

Standard reporting codes are not required for mineral resources and reserves estimation. Also, no centralized data collection and harmonization processes are applied. No efforts to harmonise ore reserves estimation for all the deposits of the country have been undertaken nationally.

ENGLISH:

### 13 Further information on the practical application of the provisions of article 5.

*Provide further information on the practical application of the provisions on the collection and dissemination of environmental information in article 5, e.g., are there any statistics available on the information published?*

*Year: 2025*

127. In the framework of the Environmental Accounts-Statistics and Sustainable Development Index, a particular estimation system is being established according to the proposed methodology of Eurostat (General Secretariat of National Statistical Service). Within the official web page of the Hellenic Statistical Authority there is a special section on Environmental Statistics.

ENGLISH:

### 14 Website addresses relevant to the implementation of article 5.

*Give relevant website addresses, if available:*

*Year: 2025*

<https://ypen.gov.gr/> - MoEE

<https://ypen.gov.gr/perivallon/klimatiki-allagi/ethnikos-klimatikos-nomos/efarmogi-ethnikou-klimatikou-nomou/> - National Climate Law

<https://ypen.gov.gr/perivallon/klimatiki-allagi/ektheseis-kai-yfistameni-katastasi/> - National climate reports

<https://ypen.gov.gr/perivallon/klimatiki-allagi/ektheseis-kai-yfistameni-katastasi/etisies-ethnikes-apografes-aerion-tou-thermokipiouatth-apo-to-2005/> - National GHG emission inventories

<https://ypen.gov.gr/perivallon/klimatiki-allagi/prosarmogi-stin-klimatiki-allagi/> - National Strategy for Adaptation to Climate Change

[http://mapsportal.ypen.gr/thema\\_climatechange](http://mapsportal.ypen.gr/thema_climatechange) - Geospatial Information Portal of MoEE, Climate Change section

[https://climate.ec.europa.eu/eu-action/eu-emissions-trading-system-eu-ets/union-registry\\_en](https://climate.ec.europa.eu/eu-action/eu-emissions-trading-system-eu-ets/union-registry_en) - EU ETS Registry

[www.geoportal.ypen.gr](http://www.geoportal.ypen.gr) - Geospatial Information Portal of MoEE

[www.mapsportal.ypen.gr](http://www.mapsportal.ypen.gr) - Geospatial Information Portal of MoEE

<http://cdr.eionet.europa.eu> - EIONET

[www.mfa.gr](http://www.mfa.gr) - Ministry of Foreign Affairs.

[www.noa.gr](http://www.noa.gr) - National Observatory of Athens.

[https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel\\_en](https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel_en) - EU Ecolabel

<http://kyy.hydroscope.gr/> - National Data Bank of Hydrological and Meteorological Information

[www.ktimatologio.gr](http://www.ktimatologio.gr) - National cadastre

<https://aepo.ypeka.gr/> - Environmental Permitting

<https://www.ypes.gr/> - Ministry of Interior

<https://www.moh.gov.gr/> - Ministry of Health

<http://ec.europa.eu/environment/ets/account.do> - EU ETS Transaction log

[www.eysped.gr](http://www.eysped.gr) - Executive Authority of the Partnership Agreement of MoEE

<https://prasinotameio.gr/> - Green Fund

<http://epad.web.auth.gr> - National Observatory of Forests

<http://bathingwaterprofiles.gr> - Bathing Water Profiles

<http://nmwn.ypeka.gr> - National Water Monitoring Network

<http://wfdver.ypeka.gr> - River Basin Management Plans

<http://wrm.ypeka.gr> – Electronic Waste Registry

<https://www.eoan.gr> – Hellenic Recycling Agency

<http://astikalimata.ypeka.gr> - Wastewater National Database

<https://msfd.hcmr.gr> - Marine Strategy Framework Directive

<http://floods.ypeka.gr> - Flood Risk Management Plans, Flood Risk and Flood Hazard Maps

<http://wsm.ypeka.gr/> - Monitoring Mechanism for Water Service Providers

<http://ynanp.gr> - Ministry of Maritime Affairs and Insular Policy

<http://hcg.gr>- Hellenic Coast Guard

[www.statistics.gr](http://www.statistics.gr) – National Statistical Authority

ENGLISH:

## 15 Legislative, regulatory and other measures implementing the provisions on public participation in decisions on specific activities in article 6.

*List legislative, regulatory and other measures that implement the provisions on public participation in decisions on specific activities in article 6. Explain how each paragraph of article 6 has been implemented. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9. Also, and in particular, describe: (a) With respect to paragraph 1, measures taken to ensure that: (i) The provisions of article 6 are applied with respect to decisions on whether to permit proposed activities listed in annex I to the Convention; (ii) The provisions of article 6 are applied to decisions on proposed activities not listed in annex I which may have a significant effect on the environment; (b) Measures taken to ensure that the public concerned is informed early in any environmental decision-making procedure, and in an adequate, timely and effective*

*manner, of the matters referred to in paragraph 2; (c) Measures taken to ensure that the time frames of the public participation procedures respect the requirements of paragraph 3; (d) With respect to paragraph 4, measures taken to ensure that there is early public participation; (e) With respect to paragraph 5, measures taken to encourage prospective applicants to identify the public concerned, to enter into discussions, and to provide information regarding the objectives of their application before applying for a permit; (f) With respect to paragraph 6, measures taken to ensure that: (i) The competent public authorities give the public concerned all information relevant to the decision-making referred to in article 6 that is available at the time of the public participation procedure; (ii) In particular, the competent authorities give to the public concerned the information listed in this paragraph; (g) With respect to paragraph 7, measures taken to ensure that procedures for public participation allow the public to submit comments, information, analyses or opinions that it considers relevant to the proposed activity; (h) With respect to paragraph 8, measures taken to ensure that in a decision due account is taken of the outcome of the public participation; (i) With respect to paragraph 9, measures taken to ensure that the public is promptly informed of a decision in accordance with the appropriate procedures; (j) With respect to paragraph 10, measures taken to ensure that when a public authority reconsiders or updates the operating conditions for an activity referred to in paragraph 1, the provisions of paragraphs 2 to 9 are applied, making the necessary changes, and where appropriate; (k) With respect to paragraph 11, measures taken to apply the provisions of article 6 to decisions on whether to permit the deliberate release of genetically modified organisms into the environment.*

*Year: 2025*

128. In Greece, public participation in Environmental Impact Assessment (EIA) and environmental permitting for category A1 and A2 activities is mandated by law. Laws 4014/2011 and 4042/2012, as amended and in force, considerably contribute to the implementation of article 6 objectives through the procedural simplification of the environmental permitting process of projects and activities, the criminal protection of the environment and the restructuring of the national system for waste management, giving emphasis to waste minimization, recycling, reduce and reuse in practice.

It should be particularly pointed out that in the context of the implementation of article 6(10) of the Convention, the national legislation fully complies with the case law of the CJEU according to which the licensing authority, when reviewing the terms and conditions of operation of an activity, does not have "full discretion to determine whether or not it is appropriate to provide for public participation".

129. More specifically, Law 4014/2011 (OJG A' 209), as in force following successive amendments with latest Law 5151/2024, aims at accelerating environmental permitting and licensing procedures, decentralizing competencies for environmental licensing, reducing bureaucratic and administrative burdens, enhancing transparency and promoting stakeholder participation in decision making. To this end, the following steps/tools are established:

- (1) Standardization of the administrative procedure for the approval, renewal or amendment of the decision setting the environmental terms for the operation of activities and projects.
- (2) Minimization of the number of competent Ministries involved in the permitting procedure.



(3) New classification of projects and activities based on their environmental impact and introduction of Standard Environmental Commitments for the permitting of low-impact installations.

(4) Improvement of the administrative structure of environmental licensing services by establishing a single licensing authority at central level under the MoEE.

(5) Introduction of dispute resolution councils dealing with particular cases, both at central/MoEE level, as well as at regional level.

(6) Establishment of a Digital Environmental Registry - DER (Law 4014/2011) enhancing public access to environmental information.

130. The DER platform (<https://eprm.yopen.gr/>) enables the online submission of Environmental Impact Studies for activities that belong to the A1 and A2 categories, as well as the monitoring of the process of issuing, renewal or amendment of the Environmental Conditions Approving Decisions and the Standard Environmental Commitments. The main users of DER are:

- the project/activity developer that uses the platform to submit the Environmental Impact Study and monitor the whole procedure
- the competent authorities that conduct the environmental permit
- other bodies that are involved in the environmental permitting procedure
- citizens and environmental organizations that are offered the ability to be informed and to keep track of any environmental permitting procedure and its results.

DER's benefits are: the automation of the environmental permitting procedures through the use of the online management system, the improvement of the whole process with more qualitative and transparent procedures, the simplification of the permitting procedure, the reduction of the time required for the monitoring and approval of the study, the reduction of bureaucracy and related costs.

Public announcements concerning the environmental licensing of projects and activities are also posted on the website of the competent Region and published in the local press.

131. Secondary national legislation which has been issued in accordance with the legislative authorisations of Law 4014/2011, and referred in article 6 of the Aarhus Convention is the following: (a) JMD 48963/2703/5.10.2012 on content specifications of environmental permits for projects and activities category A of JMD 1958/13.1.2012 (B-21), as applicable, in accordance with Article 2 § 7 of Law 4014/2011 (b) Ministerial Decision (MD) 167563/EYTIE on the procedure and the environmental clearance criteria for projects and activities (OJG964/B/2013), (c) MD1958/12 on the classification of projects and activities into categories/subcategories on the basis of their potential impact on the environment (OJG B/21/2012) and MD 3764/2016 (OJG 2471 B'), for amendment and codification of MD 1958/2016 (d) MD 20741/12 for the modification and completion of MD 1958/12 (OJG 1565/B/2012), (e) MD 1649/45/2014 on the specification of the procedures of consultation procedure and information to the public and participation of the interested party in the public consultation procedures within the context of the environmental licensing of category A projects and activities as set forth by MD 1958/2012, in accordance with the provisions of Article 19 par. 9 of Law 4014/2011 (OJG 1649/B/27.01.2014), (f) MD 1070225/2014 on the specification of the contents of the environmental clearance files for category A projects as set forth by MD 1958/2012, in accordance with the provisions of Article 11 of Law

4014/2011 (OJG 45/B/15.01.2014), (g) MD 15277/12/2012 relating to the specifications of the procedure for the incorporation of forest interventions into the AEPO (OJG 1077/B/12), (h) MD 3764/2016 (OJG 2471 B'), for amendment and codification of MD 1958/2016.

132. Strategic Environmental Assessment is covered by the JMD 107017/28.8.2006, which is in accordance with the EU Directive 2001/42/EK for the assessment of plans and projects. The provisions of the above ministerial decision ensure that the public concerned is informed early in any environmental decision-making process.

#### ENGLISH:

### 16 Obstacles encountered in the implementation of article 6.

*Describe any obstacles encountered in the implementation of any of the paragraphs of article 6.*

*Year: 2025*

133.

- Need for better cooperation among competent services regarding the inspections.
- According to NGOs, Greek law does not provide for early public participation, when all options are open and effective public participation can take place. Additionally, stakeholders' commentaries on the EIA study, submitted during the authorisation process for environmental permit, cannot be viewed by other members of the public throughout the procedure.
- According to WWF Greece and the Hellenic Ornithological Society, in the national legislation on environmental licensing there is continuous, as they claim, state intervention through legislative arrangements for extending: (a) the duration of the environmental permits (b) the duration of facility operating permits and (c) the EIA submission deadlines so that during the stage of renewal or modification of environmental permits, existing installations can operate without a regular environmental permit.

#### ENGLISH:

### 17 Further information on the practical application of the provisions of article 6.

*Provide further information on the practical application of the provisions on public participation in decisions on specific activities in article 6, e.g., are there any statistics or other information available on public participation in decisions on specific activities or on decisions not to apply the provisions of this article to proposed activities serving national defence purposes.*

*Year: 2025*

134. Business Parks are major interventions in a given area. The Secretariat-General for Industry of the Ministry of Development is responsible for the issuance of JMDs of the Ministers of Development and of Environment and Energy for approval of the development of Business Parks, in accordance with the applicable institutional framework [Law 4982/2022 (OJG A 195)]. The JMDs approving their development include, among others, the terms and measures for the protection of the environment. This environmental information results from the examination of the file submitted with the application for approval of the development of the Business Park, which also includes an Environmental Impact Study, and follows the publicity and consultation stages laid down in both Law 4014/2011 (OJG A 209) and Law 4982/2022 [Article 10(2)(b)].

135. The procedure for the siting of tourist ports follows the provisions of Law 2160/1993, as in force, in conjunction with Law 4014/2011. Specifically for marinas falling within archaeological sites, historical sites or traditional settlements or within biodiversity protection areas referred to in Article 19 of Law 1650/1986 (GG I 160), as in force, or located within the coastal zone of Attica, or having a land zone exceeding 80.000m<sup>2</sup>, as well as for other tourist ports, the location request and the submitted Strategic Environmental Impact Study are forwarded for approval by the competent service of the Ministry of Tourism to the Environmental Licensing Directorate of the MoEE, provided that a public consultation has been conducted in accordance with the relevant legislation in force (Directive 2001/42).

ENGLISH:

## 18 Website addresses relevant to the implementation of article 6.

*Give relevant website addresses, if available:*

*Year: 2025*

[www.opengov.gr](http://www.opengov.gr) - Official website for public consultation

<https://eprm.ypen.gr/> - Digital Environmental Registry

ENGLISH:

## 19 Practical and/or other provisions made for the public to participate during the preparation of plans and programmes relating to the environment pursuant to article 7.

*List the appropriate practical and/or other provisions made for the public to participate during the preparation of plans and programmes relating to the environment, pursuant to article 7. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9.*

*Year: 2025*

136. Public participation in the context of the Strategic Environmental Assessment (SEA) process is provided by JMD 107017 (OJG 1225/B/2006), which incorporated the Directive 2001/42/EC into National Law. Public participation is provided for the preparation of all plans and programmes, in the context of sectoral policies (e.g. the River Basin Management Plans, spatial plans, protected areas and Natura 2000 Management Plans, etc.).

ENGLISH:

## 20 Opportunities for public participation in the preparation of policies relating to the environment provided pursuant to article 7.

*Explain what opportunities are provided for public participation in the preparation of policies relating to the environment, pursuant to article 7.*

*Year: 2025*

137. The GSNEW of MoEE has conducted extensive public consultation on Water Resources Management Plans, which are available on its official website.

138. Each Operational Programme (OP) or Regional Operational Programme (ROP) financed by ESI Funds and which is likely to have significant effects on the environment is subjected to the SEA process before its adoption by the EU. The SEA constitutes a precondition for the program's approval in compliance with the Directive 2001/42/EC "on the assessment of the effects of certain plans and programs on the environment" and the JMD 107017/2006, which incorporated the Directive into National Law. During the SEA process of the draft plan or program, a consultation process is carried out by the public authorities and the public concerned in accordance with the JMD. The competent authority makes publicly available the SEA folder, before its adoption, to acknowledge and give to the public the opportunity to comment their views in writing or electronically, via the website of MoEE or on the respective website of the competent regional authority. The competent authority, besides electronic means, may use any other appropriate means such as public hearings, interviews, open discussions, dialogue via internet, making the public participation meaningful. In case that the pertinent authority considers that the implementation of a program could have significant effects on the environment in another EU Member State or at the request of an EU Member State, which may suffer significant environmental effects by the implementation of a Greek program, the relevant authority must forward as quickly as possible the relevant documents of SEA to the Member State concerned before adopting it. The transboundary consultation process with the other EU Member State and the public concerned is described in detail in the above JMD. In addition, the relevant authority ensures that the above information from the EU Member State referred to the program and any other relevant information concerning the envisaged measures to reduce or eliminate such effects are made available within a reasonable time to the public authorities and the public concerned. The competent Authority of MoEE evaluates the annual reports of the environmental monitoring of the OP/ROP implementation as provided by the JMD for the approval of the SEA of the respective OP/ROP and the evaluation results are made publicly available on the websites [www.eysped.gr](http://www.eysped.gr) and <https://ypen.gov.gr>.

139. The new National Biodiversity Strategy is scheduled to be revised in 2025, for a ten-year period, by the Directorate of Natural Environment and Biodiversity Management of the MoEE, taking into account the Global Biodiversity Framework as adopted in COP15 of the CBD, as well as the views of experts on biodiversity and members of civil society. The new Action Plan will also be revised at the same time with the Strategy and will be monitored for any future amendments, when necessary.

140. In the context of the elaboration of a Special Spatial Framework for Mineral Resources (SSF-MRs), which was a long-standing request of the social partners and in particular the mining industry, the preparation of the supporting study has been completed, as well as the draft Joint Ministerial Decision, the draft explanatory report and the Strategic Environmental Assessment (SEA). The purpose of the SSF-MRs is to provide guidelines, rules and criteria for the spatial organisation and development of the extractive industry and its necessary infrastructure in order to ensure its competitiveness within the framework of sustainable development principles. The study of the SSF-MRs and the corresponding SEA accompanying it are to be submitted for public consultation in the near future.

Regarding maritime spatial planning, EU Directive 2014/89 was transposed into national legislation by Law 4546/2018, which sets the national legal framework for maritime spatial planning in Greece and provides for: (a) a National Spatial Strategy for the Maritime Space (NSSMS), and (b) Maritime Spatial Plans-Frameworks (MSFs). Moreover, according to Law 4759/2020, the NSSMS is approved by the Council of Ministers, while MSFs shall be approved jointly with the SEA. The draft version of the NSSMS was set under public consultation on the MoEE website. It was subsequently submitted to the National Council for Spatial Planning (Article 4 of Law 4447/2016) to express opinion as a consultative body. In addition, at an initial stage of the preparation procedure of the NSSMS, the relevant Ministries and public bodies were consulted.

Moreover, the MoEE, in cooperation with the Ministry of Tourism, set the new Special Spatial Framework for Tourism and its SEA on its website for public consultation in the third quarter of 2024. This will be followed by the opinion of the National Council for Spatial Planning, in order to promote the approval of the special Spatial Framework and its SEA, through a JMD of the Ministers of Environment and Energy and Tourism.

141. An example of activities that can raise awareness on the value of public participation and provide the necessary information regarding the ways in which citizens can take part therein is the project “Learn-Participate-Protect the Environment” (2021-2024), implemented by iSea and Green Tank within the framework of the Active Citizens Fund program. Climate crisis, biodiversity loss and marine plastic pollution were the key pillars of this project.

ENGLISH:

## 21 Obstacles encountered in the implementation of article 7.

*Describe any obstacles encountered in the implementation of article 7.*

*Year: 2025*

142. Participatory processes can take a lot of time and money, affecting the timely implementation of the legislative act under public consultation. Another obstacle is limited public ability and willingness to participate as well as in some cases the large number of irrelevant information/ views.

In some cases, due to international and European obligations, there is not enough time for the practice of four-week consultation to be followed by public administration.

ENGLISH:

## 22 Further information on the practical application of the provisions of article 7.

*Provide further information on the practical application of the provisions on public participation in decisions on specific activities in article 7.*

*Year: 2025*

143. Law 2742/1999, as in force following successive amendments, on Spatial Planning and Sustainable Development (art.4) provides for the involvement of NGOs in environmental decision-making within the National Council for Planning and Sustainable Development and the information of the public on urban planning through public consultation.

144. In addition, it should be mentioned that all partners including natural and legal persons, environmental, social and economic partners, NGOs, research institutes, universities, bodies representing civil society, etc. participated in the Monitoring Committees of OPs/ROPs of NSRF in accordance with art. 48 of Regulation (EU) CPR 1303/2013.

ENGLISH:

## 23 Website addresses relevant to the implementation of article 7.

*Give relevant website addresses, if available:*

*Year: 2025*

<https://ypen.gov.gr> - MoEE

<http://www.opengov.gr> - Open Government Initiative

<https://www.hellenicparliament.gr> – Hellenic Parliament

ENGLISH:

24 Efforts made to promote public participation during the preparation of regulations and rules that may have a significant effect on the environment pursuant to article 8.

*Describe what efforts are made to promote effective public participation during the preparation by public authorities of executive regulations and other generally applicable legally binding rules that may have a significant effect on the environment, pursuant to article 8. To the extent appropriate, describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9.*

*Year: 2025*

145. In October 2009, the Open Government Initiative (opengov.gr) was established in Greece in order to ensure the diffusion of information and to involve all citizens and stakeholders in the decision-making mechanism. The website gives the opportunity for participation on the consultation of draft laws prior to their submission to the Hellenic Parliament, as well as presidential decrees, ministerial decisions etc. Citizens and organisations can post their comments and suggestions article-by-article.

Through the opengov.gr website citizens can be informed on important legislative initiatives of the Ministry of Environment and Energy and participate in public consultation.

The public consultation report, incorporated in the law's impact analysis report, is among the documents accompanying the laws that are published on the Hellenic Parliament's website.

Recent examples are the establishment of a waste, energy and water Regulatory Authority, to supervise and control the energy market, water services and waste management (Law 5037/2023), Law 5106/2024 which refers to addressing the effects of climate change in water management, forest management and protection, energy security, etc. and the National Climate Law (Law 4936/2022). Prior to their submission and adoption, an open public consultation was held on the official consultation website (<http://www.opengov.gr/minenv/>), with active participation of the public and stakeholders.

In addition to using e-government tools, public authorities also conduct consultations in different forms including questionnaires, face-to-face meetings of teleconferences, consultation committees, etc.

ENGLISH:

25 Obstacles encountered in the implementation of article 8.

*Describe any obstacles encountered in the implementation of article 8.*



*Year: 2025*

146. According to the Greek Ombudsman, practices that may undermine the operation of Opengov.gr include the violation of the rule of three-week consultation and consultation in two phases and the lack of documentation for integrating or not certain comments.

Moreover, there is a lack of timely and broad communication regarding both upcoming consultations and the launch of a consultation and legislation published for consultation on opengov.gr is usually not accompanied by relevant supporting material such as explanatory notes and ex-ante feasibility studies.

Although the OpenGov.gr website is, by law, the central consultation portal in the country, according to a mapping of public consultations carried out by the NGO “Green Tank” ([https://thegreentank.gr/wp-content/uploads/2024/04/2024\\_GreenTank\\_iSea\\_12XroniaDiavouleuseis\\_SymmetoxiNeon-EN.pdf](https://thegreentank.gr/wp-content/uploads/2024/04/2024_GreenTank_iSea_12XroniaDiavouleuseis_SymmetoxiNeon-EN.pdf)), various state entities (central administration, independent and supervised state bodies, local government) carry out additional online consultations by posting them on their websites and announcing them through their own communication channels. Thus, active citizens are required to conduct a wide search online and actively monitor a large number of communication channels for relevant press releases in order to identify consultations that interest or affect them. Moreover, the abovementioned survey shows a limited participation of youth in consultation processes. It is also noted that consultation is non-compulsory for regulatory acts unless foreseen in the law or their content is considered important.

ENGLISH:

## 27 Website addresses relevant to the implementation of article 8.

*Give relevant website addresses, if available:*

*Year: 2025*

<http://www.opengov.gr> - Open Government Initiative

<http://et.diavgeia.gov.gr> - Diavgeia” (Transparency) Program

<https://www.hellenicparliament.gr> – Hellenic Parliament

ENGLISH:

## 28 Legislative, regulatory and other measures implementing the provisions on access to justice in article 9.

*List legislative, regulatory and other measures that implement the provisions on access to justice in article 9. Explain how each paragraph of article 9 has been implemented. Describe the transposition of the relevant definitions in article 2 and the non-discrimination requirement in article 3, paragraph 9. Also, and in particular, describe: (a) With respect to paragraph 1, measures taken to ensure that: (i) Any person who considers that his or her request for information under article 4 has not been dealt with in accordance with the*

*provisions of that article has access to a review procedure before a court of law or another independent and impartial body established by law; (ii) Where there is provision for such a review by a court of law, such a person also has access to an expeditious procedure established by law that is free of charge or inexpensive for reconsideration by a public authority or review by an independent and impartial body other than a court of law; (iii) Final decisions under this paragraph are binding on the public authority holding the information, and that reasons are stated in writing, at least where access to information is refused; (b) Measures taken to ensure that, within the framework of national legislation, members of the public concerned meeting the criteria set out in paragraph 2 have access to a review procedure before a court of law and/or another independent and impartial body established by law, to challenge the substantive and procedural legality of any decision, act or omission subject to the provisions of article 6; (c) With respect to paragraph 3, measures taken to ensure that where they meet the criteria, if any, laid down in national law, members of the public have access to administrative or judicial procedures to challenge acts and omissions by private persons and public authorities which contravene provisions of national law relating to the environment; (d) With respect to paragraph 4, measures taken to ensure that: (i) The procedures referred to in paragraphs 1, 2 and 3 provide adequate and effective remedies; (ii) Such procedures otherwise meet the requirements of this paragraph; (e) With respect to paragraph 5, measures taken to ensure that information is provided to the public on access to administrative and judicial review.*

*Year: 2025*

147. The Greek Constitution establishes three jurisdictions, administrative, civil and criminal, organized in three instances: the courts of first instance (lower courts), the courts of appeals (higher, appellate courts) and the Supreme Courts. The Council of State is at the top of the hierarchy of ordinary administrative courts (administrative courts of first instance and administrative courts of appeal). The Council of State and the ordinary administrative courts decide on all matters of administrative - law disputes regarding the challenges to the legality of administrative acts. The judgments of the Council of State provide the highest authority on legal precedent for the lower administrative courts and set the standards for the interpretation of the Constitution and the laws and for the advancement of legal theory and practice. Like all judicial decisions, the judgments of the Council of State provide the authority of *res judicata* principle and are subject to compulsory enforcement against the Public Sector, local government agencies and public law legal persons.

148. The Council of State rules in Plenum and has six chambers. The fifth chamber of the Council has jurisdiction on environmental cases and its decisions usually define the legal interest in a broad way in favor of environmental protection.

149. Types of administrative actions for appeal against administrative decisions:

- Remedy's request: submitted to the same administrative body which issued it.
- Hierarchical appeal: submitted to the superior authority of the one which issued it.
- Special appeal: provided by a special legal provision setting a deadline within which it should be exercised. It examines legitimacy.
- Quasi-judicial action: This action examines not only legitimacy, but also the substance of the case.

150. Greece guarantees broad access to justice on environmental matters for individuals and NGOs. Citizens can invoke the right to a clean environment, provided in Article 24 of the Constitution, as the basis for suits in administrative or regular courts. However, there are no special judicial procedures for environmental matters, and court procedures are very long.

It should be particularly noted that within the framework of the Prosecutor's Office Decision 4/2020 (B'2556), which approved the Regulation on the operation and organization of the Prosecutor's Office, the appointment of a "Special Prosecutor" is provided for in cases of violations of environmental protection laws. This Prosecutor supervises the relevant pre-investigation procedure and carries out criminal prosecution in serious environmental crimes on the basis of inspection reports of Environmental Inspectors. There are no exemptions from procedural costs in environmental matters, but legal aid is available to low-income citizens. It is noted however that the cost of bringing a lawsuit is considered high for some citizens.

In more detail, the right to judicial protection is stipulated on article 20 par. 1 of the Greek Constitution: "Every person shall be entitled to receive legal protection by the courts and may plead before them his views concerning his rights or interests, as specified by law". Additionally, according to par.2 "The right of a person to a prior hearing also applies in any administrative action or measure adopted at the expense of the person's rights or interests".

151. According to Article 47 of PD 47/2015 entitled: "Administrative appeals and legal remedies": **1.** In case the applicant considers that the public authority (a) ignored his request for information, due to the expiration of the deadlines of paragraph 3 of article 44 (indirect rejection), or (b) has rejected his application unjustifiably (in whole or in part) or (c) has responded incorrectly or (d) has not complied with the application in accordance with the provisions of Article 44, is entitled to exercise: 1) the right of compensation due to exceeding the time-limits provided for in Article 44 (3) (indirect rejection) before the competent bodies. 2) An action for damages before the competent Court in accordance with the provisions on civil liability. This right also applies to third parties who may be harmed by the disclosure of the information. 3) Administrative appeal before the competent bodies for the modification or re-examination of the acts or omissions of the public authority. **2.** The administrative appeal shall be lodged within thirty days of the notification to the applicant of the reply of the public authority or of the date of expiry of the time limits referred to in paragraph 3 of Article 44 (indirect rejection). **3.** Before issuing a decision on the appeal, the legally competent body of the Ministry of Interior or the Decentralized Administration may consult the competent Environment Service of the Ministry of Foreign Affairs or the Decentralized Administration, on issues of substance of the appeal. The decision of the competent body on the appeal shall be notified to the applicant within 45 days from its filing. **4.** The decisions of the competent body on appeals are notified to the competent Directorate for International and European Affairs of MoEE, in order to prepare the relevant reports on the implementation of the provisions of this subchapter, in accordance with the provisions of article 9 par. 2 of JMD 11764/653/2006. **5.** Against the decision of the competent body on the appeal, the interested party has the right to file a substantive appeal before the competent Three-Member Administrative Court of First Instance. If the above deadline of 45 days has elapsed without action, the substantive appeal before the competent Three-Member Administrative Court of First Instance is brought against the presumptive rejection of the appeal due to the expiration of the above deadline. **6.** The judgments of the Courts shall be binding on the public authority in possession of the information, in the sense that that authority is obliged to implement the above decisions in relation to the provision of the requested information which it has directly or indirectly initially rejected.

152. The Greek Ombudsman, the Inspectors-Controllers Body for Public Administration, the General Inspector of Public Administration (both audit bodies being incorporated in the National Transparency Authority established by Law 4622/2019) and the Environmental Inspectors Body (established by Article 20 of Law 4014/2011 as in force following successive amendments) are other instruments for reinforcing legal protection and access to justice, with the consequent imposition of sanctions (administrative and penal) provided for by national legislation.

153. The Greek Ombudsman is a specialized constitutionally independent administrative authority (founded in October 1998 and operating under the provisions of Law 3094/2003) with, inter alia, environmental responsibilities. The Ombudsman investigates individual administrative actions or omissions as well as material actions taken by government departments or public services that infringe upon the personal rights or violate the legal interests of individuals or legal entities. The Ombudsman provides its services to the public free of charge and is an option available to citizens prior to their decision to resort to court for resolving their disputes. Public can submit a complaint to the Greek Ombudsman (Quality of Life Department). A complaint may be submitted by any individual, legal entity, or association. It should be pointed out that the Greek Ombudsman has the role of mediator. Another institution, the Regional and Municipal Mediator (not connected to the Greek Ombudsman's office), handles complaints against regional authorities. Both offices have audit powers and can make recommendations to the public administration, initiate disciplinary proceedings or refer the case to a public prosecutor, but cannot impose sanctions.

154. The National Transparency Authority (NTA) established by Law 4622/2019, as an Independent Authority, aims at: a) enhancing transparency, integrity and accountability of the action of governmental bodies, administrative authorities, state entities and public institutions, and b) preventing, deterring, detecting and addressing fraud and corruption phenomena in the action of public and private bodies and organisations. A standard procedure for managing and evaluating all complaints received has been put in place. No fees are required for the submission of a complaint. Anonymous or named complaints can be submitted through a designated web platform and the complainant can be informed of the progress of the complaint via e-mail.

The thematic Directorate dealing with environmental complaints and audits is the Environment, Energy and Communications Directorate, dealing with issues regarding mainly the following areas: a) compliance with national and EU environmental legislation of public and private entities throughout the country b) compliance with legislation regarding the overall function of the Greek energy market c) customer protection in the energy and telecommunications sectors.

It should also be noted that Law 4727/2020 (Article 62) provides for the lodging of an administrative appeal before the NTA against decisions of public sector bodies rejecting application/request by interested persons for the provision of documents and information. In substance, this provision seeks to provide the interested applicant with more complete protection through the possibility of exercising an out-of-court remedy. However, the grounds for rejection are broader than those provided for in the Convention.

155. Relevant legislation: Article 59 Law 5143/2024 (replacing Article 5 of the Administrative Procedure Code), article 6 of the JMD 11764/653/2006, article 3 of the JMD 9269/470/2007, article 25 of Law 4210/2013, Law 4014/2011, MD 21398/2012.

156. In the Greek law [Administrative Procedure Code (Law 2717/1999) and Council of State Code (Presidential Degree 18/1989)] there are concrete provisions that limit the losing party's liability for costs, such as Co-responsibility and Reasonable Doubt.

157. Currently there is no special body for reviewing refusals of access to environmental information. However, it is possible, under the general provision of the Greek Administrative Procedure Code, to request reconsideration either by the body that refuses access (remedy's request) or by its superior body, but these forms of review undertaken by administrative hierarchy and not an independent body.

ENGLISH:

## 29 Obstacles encountered in the implementation of article 9.

*Describe any obstacles encountered in the implementation of any of the paragraphs of article 9.*

*Year: 2025*

See above

ENGLISH:

## 30 Further information on the practical application of the provisions of article 9.

*Provide further information on the practical application of the provisions on access to justice pursuant to article 9, e.g., are there any statistics available on environmental justice and are there any assistance mechanisms to remove or reduce financial and other barriers to access to justice?*

*Year: 2025*

158. Law 3226/2004 (OJG A24/2004) provides for legal aid for poor litigants in cases of civil, commercial and criminal law. The president of the court may at the applicant's request exempt litigants in poor financial situation from the duty to pay stamp fees and the deposit for the submission of an application.

159. The Greek Ombudsman, as reported in previous reporting cycles, has received a numerous public complaints and petitions concerning denial to access to environmental information.

ENGLISH:

### 31 Website addresses relevant to the implementation of article 9.

*Give relevant website addresses, if available:*

*Year: 2025*

[www.Ministryofjustice.gr](http://www.Ministryofjustice.gr) - Ministry of Justice

<http://www.adjustice.gr> - Council of State

[www.dsa.gr](http://www.dsa.gr) - Athens Bar Association

[www.synigoros.gr](http://www.synigoros.gr) - Greek Ombudsman

<https://ypen.gov.gr> - MoEE

[www.aead.gr](http://www.aead.gr) - National Transparency Authority (Platform for complaints submission  
<https://aead.gr/complaints-eng/>)

ENGLISH:

### 32 General comments on the Convention's objective.

*If appropriate, indicate how the implementation of the Convention contributes to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well-being.*

*Year: 2025*

160. The Convention's implementation constitutes an important step forward in the efforts of the international community to ensure a sustainable environment for future generations. Greece believes that the existence of time frames, practical implementation measures and the possibility for Governments to work together with civil society provide the foundations for effective environmental protection.

ENGLISH:

### 33 Legislative, regulatory and other measures implementing the provisions on genetically modified organisms pursuant to article 6 bis and Annex I bis.

*Concerning legislative, regulatory and other measures that implement the provisions on public participation in decisions on the deliberate release into the environment and placing on the market of genetically modified organisms in article 6 bis, describe: (a) With respect to paragraph 1 of article 6 bis and: (i) Paragraph 1 of annex I bis, arrangements in the Party's regulatory framework to ensure effective information and public participation for decisions subject to the provisions of article 6 bis; (ii) Paragraph 2 of annex I bis, any exceptions provided for in the Party's regulatory framework to the public participation*



*procedure laid down in annex I bis and the criteria for any such exception; (iii) Paragraph 3 of annex I bis, measures taken to make available to the public in an adequate, timely and effective manner a summary of the notification introduced to obtain an authorization for the deliberate release or placing on the market of such genetically modified organisms, as well as the assessment report where available; (iv) Paragraph 4 of annex I bis, measures taken to ensure that in no case the information listed in that paragraph is considered as confidential; (v) Paragraph 5 of annex I bis, measures taken to ensure the transparency of decision-making procedures and to provide access to the relevant procedural information to the public including, for example: a. The nature of possible decisions; b. The public authority responsible for making the decision; c. Public participation arrangements laid down pursuant to paragraph 1 of annex I bis; d. An indication of the public authority from which relevant information can be obtained; e. An indication of the public authority to which comments can be submitted and of the time schedule for the transmittal of comments; (vi) Paragraph 6 of annex I bis, measures taken to ensure that the arrangements introduced to implement paragraph 1 of annex I bis allow the public to submit, in any appropriate manner, any comments, information, analyses or opinions that it considers relevant to the proposed deliberate release or placing on the market; (vii) Paragraph 7 of annex I bis, measures taken to ensure that due account is taken of the outcome of public participation procedures organized pursuant to paragraph 1 of annex I bis; (viii) Paragraph 8 of annex I bis, measures taken to ensure that the texts of decisions subject to the provisions on annex I bis taken by a public authority are made publicly available along with the reasons and the considerations upon which they are based; (b) With respect to paragraph 2 of article 6 bis, how the requirements made in accordance with the provisions of annex I bis are complementary to and mutually supportive of the Party's national biosafety framework and consistent with the objectives of the Cartagena Protocol on Biosafety to the Convention on Biodiversity.*

*Year: 2025*

161. EU Directive 2001/18/EC regulates the deliberate release of GMOs both for research purposes and for placing on the market, always with a focus on the protection of the environment and human health. The Directive was incorporated into national law with JMD 38639/2017/2005 (OJG 1334/21-9-2005), amended by JMDs 2775/128098/2017 and 1371/99270/2019. According to the JMD, the competent authority responsible for the deliberate release of GMOs for research and development purposes is MoEE and the competent authority responsible for the deliberate release of GMOs for placing on the market is the Ministry of Rural Development and Food. In addition, Articles 12 and 27 of the JMD provide a clear process for public consultation and access to information and Article 15 provides for public participation regarding their placing on the market (for commercial use).

Moreover, JMD 11642/1943/2002, which transposed Directive 98/81 regarding contained use of Genetically Modified Microorganisms (GMMs), also provides in Article 12 for public participation. Labeling and traceability of GMOs are also provided by EU Regulation 1830/2003.

As to the Cartagena Protocol on Biosafety, which provides for public information and participation procedures in article 23, it was ratified by national Law 3233/2004 (OJG 51/A/18.2.2004).

ENGLISH:

### 36 Website addresses relevant to the implementation of article 6 bis.

*Give relevant website addresses, if available, including website addresses for registers of decisions and releases related to genetically modified organisms:*

162. The list of authorized genetically modified organisms (GMOs) and the exact scope of authorisation are available at the EU register of GM food and feed.

[https://food.ec.europa.eu/plants/genetically-modified-organisms/gmo-register\\_en](https://food.ec.europa.eu/plants/genetically-modified-organisms/gmo-register_en)