

## NATURE SCORE CARD



Greece

Greece has been a member of the European Union since 1981. Its Natura 2000 network consisted of 419 sites, covering 42.946 km<sup>2</sup>. Terrestrial sites are covering 35.747km<sup>2</sup> (27% of the land area) while marine N2000 sites are covering 7.199 km<sup>2</sup>. As recently as December 2017, Greece proposed an expansion of its Natura 2000 network, so that the total number of Natura 2000 sites will reach 446 to cover approx. 28% of the land and 22% of marine territory of Greece. The below analysis and recommendations suggest that national authorities still need to make further efforts in order to fully implement the Birds and Habitats Directives and effective conservation of threatened species and habitats to be achieved on the ground.

	<ul style="list-style-type: none"> <li>• Transposition of the Birds and Habitats Directives</li> </ul>
	<ul style="list-style-type: none"> <li>• Site designation</li> <li>• Avoid deterioration of sites, disturbance of species and implementation of appropriate assessments</li> <li>• Landscape connectivity</li> <li>• Funding and resources</li> <li>• Habitats and species monitoring</li> <li>• Promotion of research</li> <li>• Stakeholder engagement, public participation and communication</li> </ul>
	<ul style="list-style-type: none"> <li>• Management of sites</li> <li>• Species protection</li> <li>• Non-native species</li> </ul>

### ACTION PLAN FOR NATURE IN GREECE

#### Transposition and designation

- Complete the designation of the Natura 2000 network with the elaboration of conservation objectives for all sites.

#### Prevention of negative impacts

- Ensure no degradation of habitats and disturbance of species in Natura 2000 sites.
- Complete implementation of appropriate assessment of plans or projects which may affect Natura 2000 sites.

#### Active management to achieve favourable conservation status

- Ensure the effective and functionality of the newly established national protected areas system.
- Implement management measures via elaboration and approval of site management plans.
- Implement species conservation measures via elaboration and approval of species action plans.
- Take actions to improve the ecological coherence of the Natura 2000 network.

#### Funding

- Identify in more detail the funding needs included in the 2014 Prioritized Actions Framework and increase national funding for the Natura 2000 network.

#### Monitoring and research

- Develop a national nature monitoring system.
- Promote research on nature and biodiversity.

#### Stakeholder engagement

- Strengthen processes for open and participatory consultations and stakeholder engagement.

The information in this scorecard is based on expert analysis from Elliniki Etairia – Society for the Environment and Cultural Heritage, Hellenic Ornithological Society, Mediterranean SOS Network and WWF Greece. Full details on the following pages.

LEGAL REQUIREMENT	STATUS IN GREECE
<b>Transposition</b>	<ul style="list-style-type: none"> <li>The transposition of the Birds and Habitats Directives is largely complete</li> </ul>
<b>Site designation</b> Designate and establish sites that form the Natura 2000 network of protected areas  <i>Habitats Directive, art. 3 &amp; 4</i> <i>Birds Directive, art. 3 &amp; 4</i>	<ul style="list-style-type: none"> <li>Until recently Greece's 419 Natura 2000 sites covered 27% of land and 6% of marine territory of Greece. In December 2017, Greece proposed an expansion of its Natura 2000 network, so that the number of sites will reach 446 to cover approx. 28% of the land and 22% of marine territory of Greece.</li> <li>As SCI have not been completely designated as Special Areas of Conservation (SAC) by Greece, the European Commission has launched an infringement procedure – at the stage of reasoned opinion. Specifically Greece has not determined the conservative objectives and administrative and management measures for each site, within the period of 6 years since the approval of the Mediterranean List of SCIs in 2006.</li> <li>The Natura 2000 sites are integrated in the protected areas' system. Natura 2000 sites are a category within the national system of protected areas.</li> </ul>
<b>Management of sites</b> Establish site protection measures in Natura 2000 sites  <i>Habitats Directive, art. 6(1)</i> <i>Birds Directives, art. 4(1) &amp; 4(2)</i>	<ul style="list-style-type: none"> <li>No conservation objectives or management measures are defined yet.</li> <li>Until recently only two management plans (Schinias and Koroneia) had been adopted. To date, Greece does not have specifications on management plans.</li> <li>The Schinias' management plan was adopted in 2001 and has not been updated since.</li> <li>The Koronia management plan was completed just before Greece's conviction at the Court of Justice of the European Union as a result of the lack of protection for the area. Regarding Koronia there is already a reasoned opinion based on art. 260 TFEU (11/17/2016). This refers to the process of an EU member state of non-compliance with formal juridical decision of ECJ.</li> <li>These two management plans cover 2% of SACs and 1% of SPAs in Greece.</li> <li>Recently, three local management plans targeting the conservation of specific species within Natura 2000 sites were approved in the following areas, all designated as national parks: Delta Nestou- Lake Bistonida, Lake Ismarida, Delta Evrou and Lake Kerikini.</li> <li>The Ministry of Environment and Energy (MEEN) has issued a call for tender which includes the development of management plans for all Natura 2000 sites. If the original timeline is followed, management plans are expected to be adopted by 2020.</li> <li>Management measures are implemented only in certain areas, e.g. where protected areas management bodies are in place or where NGOs' projects or other, usually EU funded, projects are implemented.</li> <li>Until recently, designated management bodies covered only 25% of the Natura 2000 area in Greece. Even in these cases, inappropriate institutional and regulatory designation of Natura 2000 sites as national protected areas and many difficulties such as the lack of stable funding, insufficient staff etc has been a detriment to proper operation. Hence, few are able to fulfill their role with respect to management.</li> <li>Due to the absence of a designated management authority for each Natura 2000 site, most sites fell under the responsibility of different environmental services and authorities, among which the responsibilities are not clear and often lead to differentiated approaches.</li> <li>In February 2018, a new law was approved that set up the structure of the national protected areas system. Almost all Natura 2000 sites will be included under the authority of a management body, however many issues remain for the system to become operational. It is necessary that the new system ensures effective protection and functional management authorities.</li> <li>Conservation measures proposed for Natura 2000 in management tools do not take into account climate change considerations, although such provisions are included in the National Biodiversity Strategy and National Climate Change Adaptation Strategy.</li> </ul>
<b>Species protection</b> Ensure species protection  <i>Habitats Directive, art. 12-16</i> <i>Birds Directive, art. 5-9</i>	<ul style="list-style-type: none"> <li>Two national action plans (for <i>Neophron percnopterus</i> and <i>Anser erythropus</i>) and one regional (<i>Falco naumanni</i> in Thessalikos Kampos) were approved in the fall of 2017. These are the first species action plans to be approved in Greece, however, no common specifications for the elaboration of additional action plans are in place.</li> <li>Several action plans have been elaborated in the context of LIFE projects but they have not been officially approved.</li> <li>Measures for species protection are implemented only on a few occasions.</li> </ul>

<p><b>Avoid deterioration of sites, disturbance of species and appropriate assessment</b></p> <p>Ensure no deterioration of habitats and disturbance to species in Natura 2000 sites</p> <p><i>Habitats Directive, art.6(2)</i></p> <p>Ensure that plans or projects likely to affect Natura 2000 sites are subject to appropriate assessment</p> <p><i>Habitats Directive 6(3)</i></p> <p>Ensure that developments affecting the integrity of the site are not approved unless there are no alternative solutions, and for imperative reasons of overriding public interest and if compensatory measures are taken</p> <p><i>Habitats Directive 6(4)</i></p>	<ul style="list-style-type: none"> <li>• No permits/derogations for activities impacting protected species are issued and published</li> <li>• Art 6(2) is partially implemented. The recent CJEU decision on Kyparissiakos Bay (C-504/14) was based also on a violation of this article.</li> <li>• Article 6 procedures to assess projects and plans are implemented partially, with several problems related to the appropriate assessment procedure.</li> <li>• Appropriate assessments are a component of the environmental impact assessment.</li> <li>• From the first Ministerial Decision to transpose the EU Habitats Directive, the process of appropriate assessment has been full of deficiencies. Although there are several and recent revisions in the appropriate assessment specifications (special ecological assessments), it is doubtful whether the procedure fully conforms to the Directive requirements.</li> <li>• Often the distinction between EIAs and appropriate assessment is not clear, it is not implemented by the relevant authorities, nor is it enforced adequately by the courts.</li> <li>• Nonetheless, on several occasions the national courts have ruled the permit procedure as insufficient, cancelling environmental terms or setting the framework for their revisions. Examples regarding the appropriate assessment, according to art. 6 (3) include; the Hellenic Council of State 4224/2013 (Environmental permission for the construction of reservoirs in Chania Omalos plateau), Hellenic Council of State 807/2014 (Siting of wind farms in Important Bird Areas) and Hellenic Council of State 585/2014 (Environmental permit of organic farm holding with porcine animals in a Natura 2000 site in southern Rethymno).</li> <li>• Correspondingly, the CJEU has ruled against Greece in the case about Zakynthos (C-600/12) which partially refers to art. 6 (3) (Renewal authorization for a landfill site without appropriate assessment) as well as the Acheloos River case (C-43/10, 10th and 11th question). At the same time, an infringement procedure is pending on the insufficient appropriate assessment of the Renewable Energy Spatial Plan.</li> <li>• Appropriate assessment studies are undertaken by consultants who are not independent. They are hired by the interested project developer. The studies are evaluated by the authorities. However, relevant authorities are often understaffed and lack the necessary expertise.</li> <li>• According to published opinions by the EU in accordance to art. 6 (4), this provision has never been applied on a Greek plan or project.</li> </ul>
<p><b>Landscape connectivity</b></p> <p>Encourage the management of landscape features to improve the ecological coherence of the Natura 2000 network</p> <p><i>Habitats Directive art. 3(3) &amp; 10</i></p>	<ul style="list-style-type: none"> <li>• Although the National Biodiversity Strategy and the National Climate Change Adaptation strategy, propose the implementation of measures, to improve the ecological coherence of the Natura 2000 network, no specific, relevant framework in this direction has been instituted.</li> <li>• Wildlife nature reserves, some forest law provisions and the institutional framework for the protection of 380 coastal island wetlands through a relevant presidential decree, improve, to an extent, landscape connectivity.</li> </ul>
<p><b>Funding and resources</b></p> <p>Identify funding needs</p> <p><i>Habitats Directive, art. 8</i></p>	<ul style="list-style-type: none"> <li>• Greece has a Prioritized Action Framework (PAF), but it was not taken into consideration during the programming period 2014- 2020</li> <li>• The PAF estimates the annual needs of the Natura 2000 network in Greece at €84 million and one off actions at €246 million, with the total amount of actions for the programming period amounting to €668.5 million euros.</li> <li>• Until recently, the Nature Directives' funding needs were covered almost exclusively by EU co- funding sources. For instance, for years Structural Funds (CSF, NSRF) covered the operation and work of all the protected areas' management bodies. Other European projects, implemented by a variety of partners (mostly academic and research institutions and NGO's), supported actions for specific areas and species. Through the projects, basic monitoring and management needs were covered.</li> <li>• The minimum national resources from the national budget which are committed to the Natura 2000 network and the implementation of the Nature Directives cover mostly the staff in the relevant services and authorities. Recently some additional resources have been secured through the Green Fund (for example funding management bodies). The new law of the national system of protected areas provides for the first time that funds from the national budget will be dedicated to covering the needs of the management bodies.</li> <li>• Relevant services and authorities are understaffed and often lack relevant</li> </ul>

<p><b>Habitats and species monitoring</b></p> <p>Undertake monitoring of the conservation status of habitats and species of Community importance</p> <p><i>Habitats Directive, art.11</i></p>	<p>knowledge and expertise.</p> <ul style="list-style-type: none"> <li>• There is no national monitoring system in place.</li> <li>• Greece did not submit an art. 17 report to the EC for the 2007- 2012 period on time. The relevant monitoring project of protected habitats and species was completed in 2015.</li> <li>• Monitoring plans and projects have been completed by protected areas' management bodies, NGO and scientific institutions, enriching the knowledge of the protection of specific habitats and species.</li> <li>• Usually when assessments are undertaken and updated data are of good quality, but there have been instances when data fell well below the required standards.</li> <li>• Data are available via the EU website. They are not available nationally unless specifically requested.</li> </ul>
<p><b>Promotion of research</b></p> <p>Encourage research and scientific work</p> <p><i>Habitats Directive, art. 18</i> <i>Birds Directive, art. 10</i></p>	<ul style="list-style-type: none"> <li>• There is no specific national promotion of scientific and research activity for species and habitats, but Greek academic and research institutions are significantly active in this field.</li> </ul>
<p><b>Non-native species</b></p> <p>Ensure that introductions of non-native species do not prejudice native habitats and species</p> <p><i>Habitats Directive, art. 22</i> <i>Birds Directive, art. 11</i></p>	<ul style="list-style-type: none"> <li>• No particular measures are in place to address the threat caused by invasive alien species</li> </ul>
<p><b>Stakeholder engagement, public participation and communication</b></p> <p>Stakeholder engagement and public participation are key to ensuring effective implementation</p>	<ul style="list-style-type: none"> <li>• The most recent proposal for the expansion of the Natura 2000 network (mainly marine areas), was accompanied by an online public consultation process. This is a new process.</li> <li>• All Natura 2000 site designation proposals as well as the conclusion of conservation objectives have to go through the scientific Natura 2000 Committee, which serves as the Greek state's main scientific advisor on biodiversity conservation.</li> <li>• The experience regarding the development of management plans is not adequate to allow for comment on the stakeholder participation during their development.</li> <li>• Recently some projects that are being implemented try to integrate principles of stakeholder participation.</li> <li>• Public consultation processes before approving management plans are not legally foreseen.</li> <li>• Public consultation processes regarding the granting of authorisations under Article 6 are present, but they are not adequate. For example, there is no central online system of information with respect to the consultation processes that are taking place. Positions of various stakeholders are not public.</li> <li>• Several local and regional Natura 2000 awareness raising initiatives and projects have been implemented, but not on a national scale.</li> <li>• There is no Natura 2000 communication strategy for the local level/site level.</li> </ul>

## RECOMMENDATIONS FOR GREECE

- Complete the designation of the Natura 2000 network with the elaboration of conservation objectives for all sites.
- Ensure the effectiveness and functionality of the newly established national protected areas system.
- Implement management measures via elaboration and approval of site management plans.
- Implement species conservation measures via elaboration and approval of species action plans.
- Ensure no degradation of habitats and disturbance of species in Natura 2000 sites.
- Complete implementation of appropriate assessment of plans or projects which may affect Natura 2000 sites.
- Take actions to improve the ecological coherence of the Natura 2000 network, based on the recommendations of the National Biodiversity Strategy.
- Identify in more detail the funding needs included in the 2014 Prioritized Actions Framework and increase national funding for the Natura 2000 network.
- Develop a national nature monitoring system.
- Promote research and scientific activity on nature and biodiversity.
- Strengthen processes for open and participatory consultations and stakeholder engagement.