



Horizontal
Environmental
Issues

1. Environmental inspections

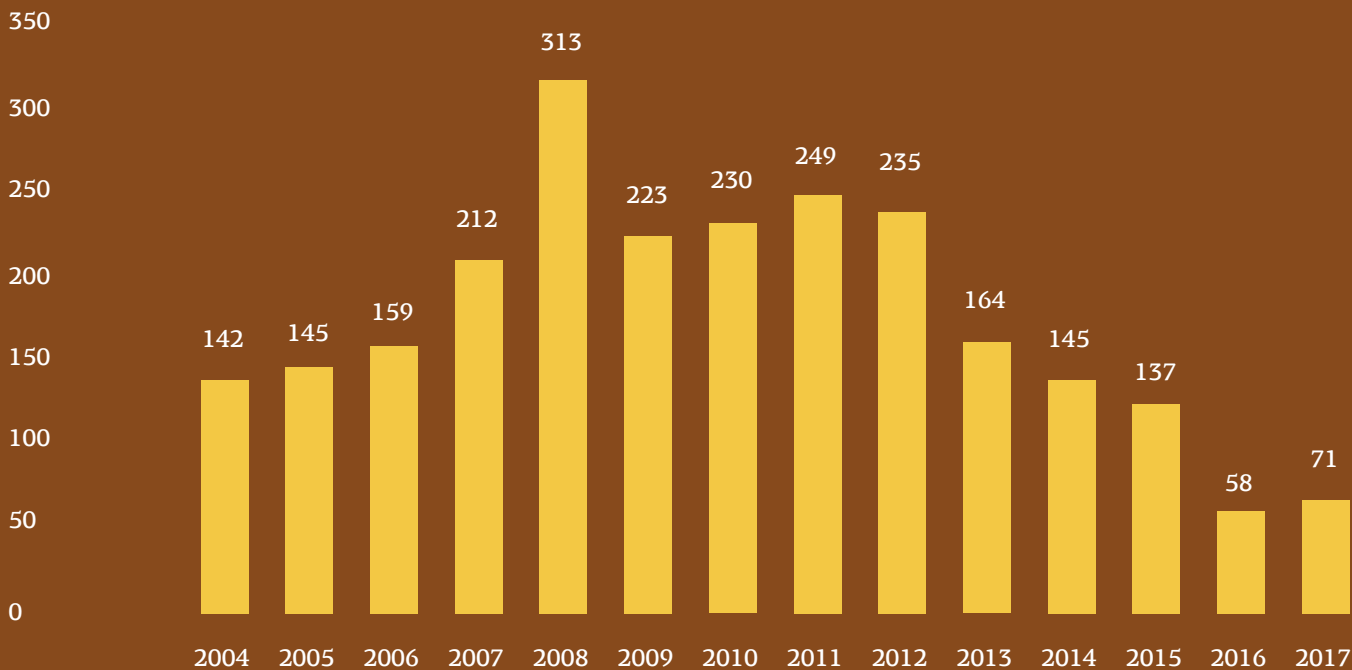
Due to the inadequate staffing in Environmental Inspectorate of the Ministry of Environment and Energy, in recent years there has been a continuous reduction of environmental audits carried out by Environmental Inspectors.

The graph 7.1. illustrates the total amount of inspections of Northern and Southern Greece Environmental Inspectors from 2011 to 2017, where in recent years there has been a significant reduction in audits due to the reduced number of inspectors and, hence, the accumulation of a large number of cases which require a substantial time period to be completed.

80% of the 2017 inspections refers to activities of the public sector (including waste management and sewage treatment plants), whereas the rest 20% referred to activities of the private sector. In addition to the limited number of audits, the gradual under-staffing of the EnvironmentalInspectorate in recent years has a negative impact on the total number of administrative acts that are required for the closure of the infringement cases (audit reports, infringement documents and imposition of fines) as illustrated in Graph 7.2.

Graph 7.1.
Number of environmental inspections carried out
by the Environmental Inspectors, 2004-2017

Number of Environmental Inspections



Most of the inspection (72%) of 2017 were non-routine (29% of them upon ministerial order, 20% upon complaint, 10% on the order of the public prosecutor or General Inspector of Public Administration, etc.). Only 28% of the inspections were routine inspections according to the program of the Inspectorate, a significant increase compared to just 13% of the previous year.

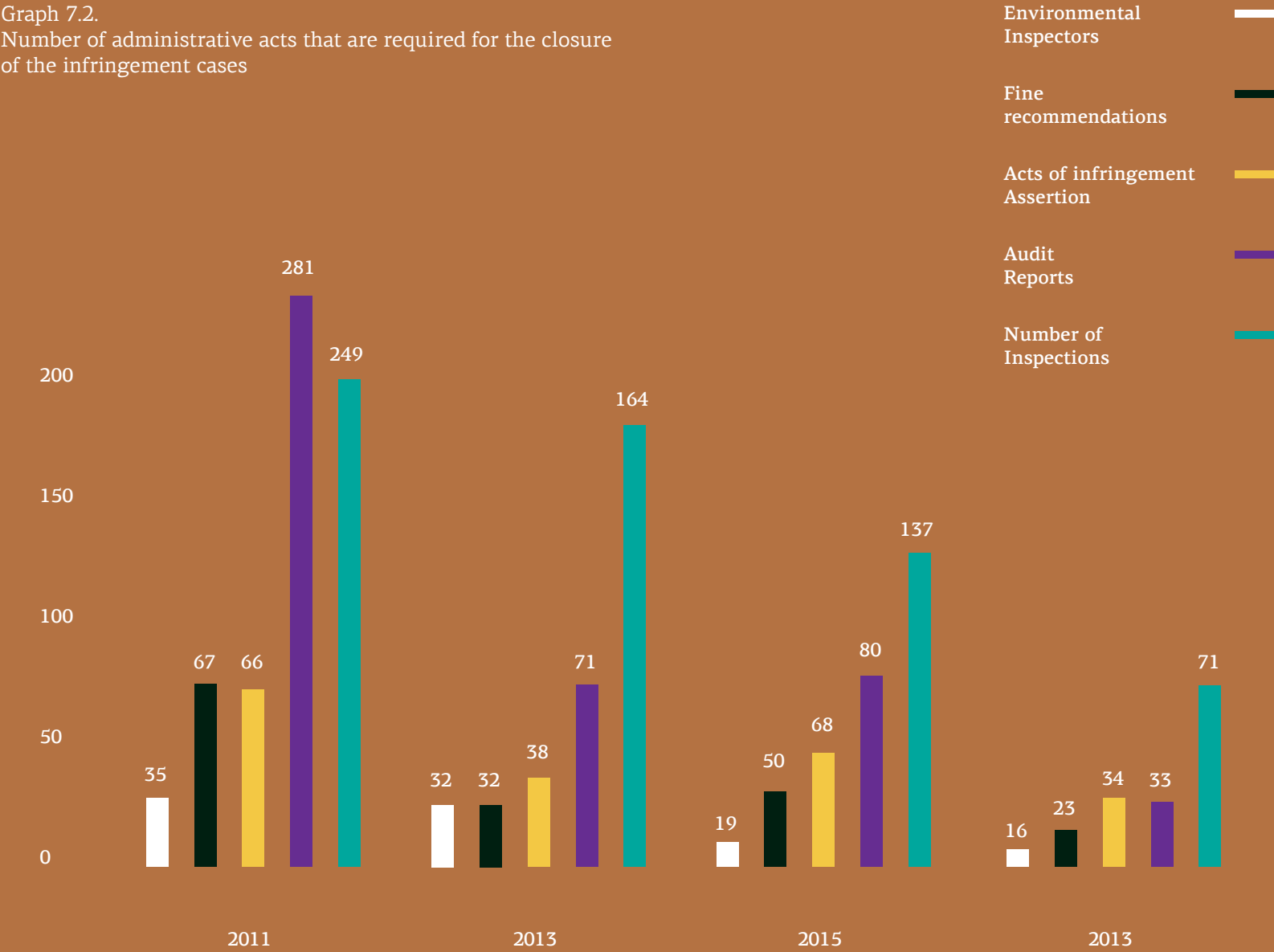
In 2017, the Environmental Inspectorate submitted 23 decisions imposing a fine totaling 672,250 euros to the Minister of Environment and Energy. The largest proportion of the fines submitted (70%) ranges from 700 to 25,500 euros.

It should be noted that in the country, multiple environmental inspections are carried out mainly by the services of the Regions (Directorate of Environment and Spatial Planning, etc.), but also by other services such as port authorities, Decentralized Administration, Forestry Offices, etc. Overall, the number of environmental audits is estimated at over 1000 but there are no accurate statistics. There is an ongoing work for the construction of a relevant database that will allow the recording of the highest percentage of environmental audits.

Finally, by the end of 2017, there were 72 cases of Directive 2004/35 (environmental liability directive). Furthermore, from 2011 to 2017 the remedial measures in the context of the liability directive have been completed for another 26 cases.



Graph 7.2.
Number of administrative acts that are required for the closure
of the infringement cases



2. Environmental Impact Assessments

The environmental licensing procedure has been radically reviewed by the law 4014/2011 that became operational at the beginning of 2012 with the enactment of the MD 1958/2012 on the classification of projects (it has been modified several times since then with the aim of further rationalize the classification of projects). The main objectives of Law 4014/2011 are to simplify, abbreviate and rationalize the Environmental Impact Assessment (EIA) procedures, while simultaneously guaranteeing a high level of environmental protection.

The previous legal regime required an EIA report for significantly more projects and activities compared to those required by the Directive 2011/92. In addition, the previous law required a compulsory preliminary environmental assessment report for a large number of projects and activities. Thus, between 2005 and 2009, the number of environmental licensing cases-files in Greece exceeded 21,500 annually, of which approximately 13,300 were evaluated by the Regions, about 7,500 by the Decentralized Administrations and about 650 by the Ministry for the Environment. These numbers were very high compared to all other EU countries in absolute numbers (France that presents the highest number requires less than 4,000 EIAs per year) but even more so in terms of numbers per inhabitants or per GDP.



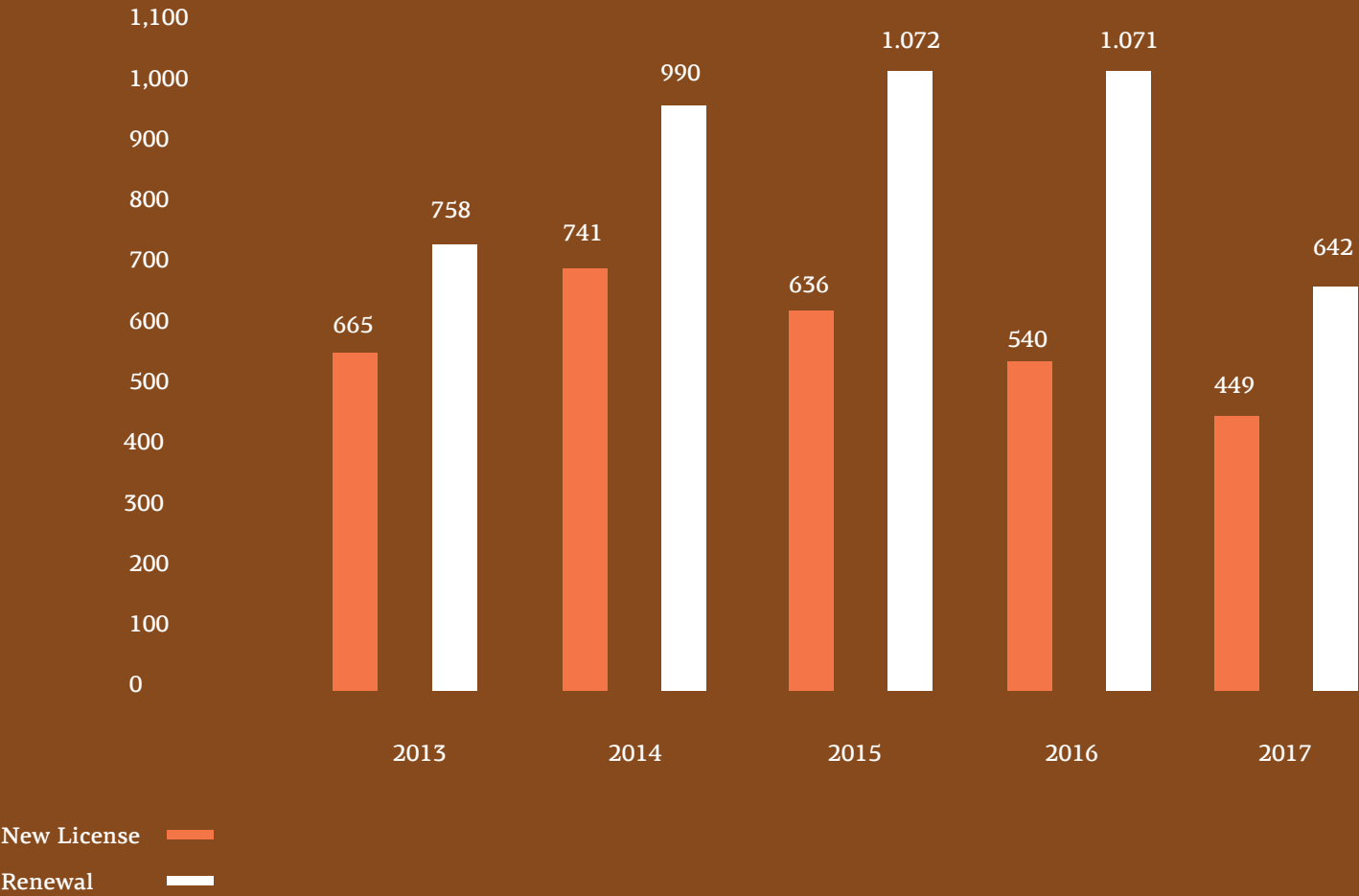
At the same time, the average time for completion of the total procedure for environmental licensing in Greece exceeded 20 months for a A1 project whereas the respective required time in 8 EU member states was 9.8 months.

The new legal framework was gradually completed from 2012 to 2014 with the issuances of over 25 secondary legal acts. Some minor additions and amendments were carried out later on. The main element of the current system is the reduction of the number of projects for which environmental licensing is required and a reduction of the number of projects for which an EIA is required. The projects are classified in 12 thematic groups and in 2 main categories, i.e. A and B. Category A projects refer to larger projects with wider environmental impacts and require an EIA whereas category B projects have only local environmental impacts and get predetermined environmental terms (mainly from the regional authority or annexed to the operation license). Category A is divided into subcategory A1 (the largest projects with more severe impacts) where the EIA is submitted to the Ministry of Environment and Energy and subcategory A2 (projects with less severe impacts) where the EIA is submitted to the competent Decentralized Authority.

Furthermore, the environmental permit has incorporated a number of other licenses and permits that were required under the previous legal regime. In terms of the quality of the EIAs, the new legal framework provides for specifications of the content and the accompanying documents for all types and categories of EIA reports depending on the type of project and for the complete standardization of the procedures for the evaluation of the EIA report. The creation of the Digital Environmental Registry (DER) for the online licensing of projects is also foreseen and expected to become operational by the summer of 2018.

Finally, to improve transparency, all environmental licenses are required to be uploaded to a dedicated website (<http://aepo.ypeka.gr>). According to the statistical data provided through this website, since 2015 there is a gradual decrease of the EIAs carried out every year (1.091 EIAs in 2017, 35% less compared to 2015) reflecting both the state of the economy and the reduction of the projects that require an EIA report via the amendments of the classification MD 1958/2012.

Graph 7.3.
Environmental licenses (new and renewals) per year
(Source: <http://aepo.ypeka.gr>)



About 60% of them refer to renewals and amendments of existing licenses and the remaining 40% refers to new projects. 85% of the total number of projects that are subject to an EIA is classified as an A2 subcategory and 15% as A1. The industrial projects represent the highest percentage among the 12 thematic groups (about 20%) followed by renewables (about 13.5%) and mining activities (about 12%).

3. Environmental certifications

As regards EMAS (Eco-Management and Audit Scheme), at the end of 2017 there were 36 certified organizations with 1333 sites (source: National Report to the European Commission). It should be noted that the EMAS restarted its operation in November 2016 after a period of more than 3 years.) Concerning ecolabel, its general statistics at the end of 2017 were as follows:

- 12 companies / producers of interior and exterior paint and varnish with 278 products.
- 2 companies / producers of detergents / detergents with 13 products.
- 2 cotton ginning companies concerning integrated management AGRO-2 ginned cotton fiber, wrapped in packages of 210-240 Kg, harvested 2017 with around 7000 tons for export.
- 12 hotels, including 3 hotels that are not located in Greece

