

## Response to the request for additional evidence - Fitness Check of the EU nature legislation that was provided by Greek NGOs

April 30, 2014

### **Questions:**

**R.4: Please provide sources for the public participation figures given in relation to the 'Eurobirdwatch', 'Swallow Nest Day' and 'Midwinter Counts' events.**

The participation figures have grown steadily over the years. We provide additional evidence for the year 2014/15. For all the events below additional information can be sought from the Hellenic Ornithological Society<sup>1</sup>.

#### Eurobirdwatch

Eurobirdwatch is the annual BirdLife partners event that takes place every year in order to admire and learn more on the impressive migration of birds to the South ([www.eurobirdwatch.eu](http://www.eurobirdwatch.eu)). The Hellenic Ornithological Society (the BirdLife partner in Greece) coordinates Eurobirdwatch in Greece. Eurobirdwatch 2014 took place in 34 different places all over Greece<sup>2</sup> with a total participation of 6.850 people. Detailed data of numbers of participants are available from HOS in the attached excel sheet in Greek. Indicatively, we note below some of the events that took place in 2004 and provide links that are available in Greek or English.

- In Vravra wetland in Attica, more than 500 people participated<sup>3</sup> in the event organized by HOS in cooperation with ANIMA, the Athens International Airport, the Municipality of Markopoulo, Directorate of Primary Education in Eastern Attica and the Archaeological Museum of Vravra.
- Eurobirdwatch event in the Sani Wetlands, organized by HOS with the cooperation of Sani Resort, with more than 300 participants.<sup>4</sup> HOS records a total of 790 participants.
- The Management Body of Northern Pindos National Park organized for the 5<sup>th</sup> consecutive year the Eurobirdwatch event with 45 participants.<sup>5</sup>
- In Crete the Ecological Intervention of Heraklion, with the collaboration of WWF Greece, University of Crete-Natural History Museum of Crete, organized Eurobirdwatch with the participation of 100 people<sup>6,7</sup>.
- On the Island of Syros, ΕΛΙΧΡΥΣΟΣ ΚΟΙΝΩΝΙΑ with the collaboration of Primary Education Office of the Cyclades organized Eurobirdwatch in the Botanical garden of Syros with the participation of 70 people<sup>8</sup>.

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<sup>2</sup> List of Eurobirdwatch 2014 locations: <http://files.ornithologiki.gr/images/news/eurobirdwatch/eurobirdwatchevents2014.pdf>

<sup>3</sup> <http://www.wild-anima.gr/draseis-se-ekseliksi/1828-sti-giorti-ton-poulion>

<sup>4</sup> [http://www.saniwetlands.gr/en\\_GB/?p=270](http://www.saniwetlands.gr/en_GB/?p=270)

<sup>5</sup> <http://pindosnationalpark.gr/?p=3146>

<sup>6</sup> <http://www.chaniapost.eu/2014/09/29/dont-miss-eurobirdwatch-on-45-october-2014/>

<sup>7</sup> <http://www.digitalcrete.gr/events/gr/festival/giorti-ton-poulion-2014-73194>

<sup>8</sup> <http://www.naxosnow.gr/evropaiki-giorti-ton-poulion-2014-sti-siro/>

- The management body of Dadia-Lefkimi-Soufli Forest National Park organized the Eurobirdwatch event with the participation of 250 people<sup>9</sup>.
- The Management Body of Kalamas and Acheron rivers organized the Eurobirdwatch event with the participation of 220 people<sup>10</sup>.
- The Management Body of Ainos National Park organized Eurobirdwatch with the participation of more than 140 people<sup>11</sup>.

### Swallow Nest Day

The "Swallow Nest Day" event took place in 2015, in total 15 cities or areas under the coordination of HOS with 11 Management Bodies of Protected Areas, environmental organizations, universities and 6 municipalities<sup>12</sup>. In total 4000 children and adults participated in 20-25 places. Some examples include:

- Swallow Nest Day in the city of Kastoria, with the collaboration of the Municipal library, the Municipality and the support of six Cultural Associations<sup>13</sup>.
- Swallow Nest Day in the city of Tripoli, with the the Management Body of Mount Parnon and Moustos wetland, in five kindergartens and three primary schools<sup>14, 15</sup>.
- Swallow Nest Day at the Information Centres of Lakes Vistonida – Ismarida and Nestos Delta of the National Park of East Macedonia-Thrace during four separate events<sup>16</sup>.

### International Water Bird Census

The Water Bird Census (widely known as midwinter census) is coordinated by the Hellenic Ornithological Society and many partners. In 2015, the midwinter census was organized in 147 places all over Greece with the participation of more than 300 volunteers and employees of Management bodies of Protected Areas<sup>17,18,19</sup>.

<sup>9</sup> <http://www.radioevros.gr/2014/10/i-eurwpaiki-giorti-twn-pouliwn-sti-dadia/>

<sup>10</sup> <http://www.fanaripress.gr/ekdeloseis/oloklerothekan-ekdeloseis-gia-ten-paneuropaike.html>

<sup>11</sup> [http://www.foreasainou.gr/anakoinoseis-enimerosi/deltia\\_tupou/2014/europaike\\_giorti\\_poulion\\_2014](http://www.foreasainou.gr/anakoinoseis-enimerosi/deltia_tupou/2014/europaike_giorti_poulion_2014)

<sup>12</sup> [http://www.ornithologiki.gr/page\\_cn.php?aID=1721](http://www.ornithologiki.gr/page_cn.php?aID=1721) Additional data and detailed numbers of participants are available from HOS.

<sup>13</sup> [http://sentra.com.gr/index.php?option=com\\_content&view=article&id=7148:pragmatopoiithikan-epityxia-xelidonismata&catid=96:politismos&Itemid=213](http://sentra.com.gr/index.php?option=com_content&view=article&id=7148:pragmatopoiithikan-epityxia-xelidonismata&catid=96:politismos&Itemid=213)

<sup>14</sup> <http://kynourianet.gr/%CE%BF-%CF%86%CE%BF%CF%81%CE%AD%CE%B1%CF%82-%CE%B4%CE%B9%CE%B1%CF%87%CE%B5%CE%AF%CF%81%CE%B9%CF%83%CE%B7%CF%82-%CE%B4%CE%B9%CE%BF%CF%81%CE%B3%CE%B1%CE%BD%CF%8E%CE%BD%CE%B5%CE%B9-%CE%BA%CE%B1%CE%B9/>

<sup>15</sup> [http://www.fdpamonas.gr/xelidonismata\\_2015\\_final/](http://www.fdpamonas.gr/xelidonismata_2015_final/)

<sup>16</sup> <http://ellinikifysi.gr/2015/04/nestos-114/#.VUCX75P0INU>

<sup>17</sup> <http://www.evros-delta.gr/en/news/news-announcements/item/192-%CE%BC%CE%B5%CF%83%CE%BF%CF%87%CE%B5%CE%B9%CE%BC%CF%89%CE%BD%CE%B9%CE%B1%CF%84%CE%B9%CE%BA%CE%B5%CF%83-%CE%BA%CE%B1%CF%84%CE%B1%CE%BC%CE%B5%CF%84%CF%81%CE%B7%CF%83%CE%B5%CE%B9%CF%83-%CF%83%CF%84%CE%BF-%CE%B4%CE%B5%CE%BB%CF%84%CE%B1-%CF%84%CE%BF%CF%85-%CE%B5%CE%B2%CF%81%CE%BF%CF%85>

<sup>18</sup> [http://www.axiosdelta.gr/en-gb/news\\_current/%CE%BC%CE%B5%CF%83%CE%BF%CF%87%CE%B5%CE%B9%CE%BC%CF%89%CE%BD%CE%B9%CE%AC%CF%84%CE%B9%CE%BA%CE%B5%CF%82%CE%BA%CE%B1%CF%84%CE%B1%CE%BC%CE%B5%CF%84%CF%81%CE%AE%CF%83%CE%B5%CE%B9%CF%822015%28en-gb%29.aspx](http://www.axiosdelta.gr/en-gb/news_current/%CE%BC%CE%B5%CF%83%CE%BF%CF%87%CE%B5%CE%B9%CE%BC%CF%89%CE%BD%CE%B9%CE%AC%CF%84%CE%B9%CE%BA%CE%B5%CF%82%CE%BA%CE%B1%CF%84%CE%B1%CE%BC%CE%B5%CF%84%CF%81%CE%AE%CF%83%CE%B5%CE%B9%CF%822015%28en-gb%29.aspx)

<sup>19</sup> [http://www.spp.gr/index.php?option=com\\_content&view=article&catid=1:company-general&id=92:2011-02-08-10-24-01?&lang=en](http://www.spp.gr/index.php?option=com_content&view=article&catid=1:company-general&id=92:2011-02-08-10-24-01?&lang=en)



**Please provide sources of information concerning the 2007 forest fires and ensuing public protests and debates in ministries, university, NGOs.**

Following the catastrophic fires throughout Greece in the summer 2007, it became evident that there was great need for a reevaluation of the current national forest protection system and policies. With the impacts of climate change already being felt, it is clear that forests in the future will become both more valuable to man and nature and more vulnerable to the threat of forest fires. At the same time Greek public became more vocal and responsive on environmental issues and community involvement increased on issues regarding forest fire prevention & suppression, as well as post-fire forest restoration. The first signs became evident after 2007 fires, when thousands of people gathered in the heart of the city of Athens, in protest for the loss of nature, especially of Mount Parnitha – a National Forest Park and a Natura 2000 site (GR3000001/SPA/SAC), which is very close and dear to Athenians (June 2007). Several other discussions initiated regarding post-fire rehabilitation of the burnt forest and agricultural areas of Peloponnese (August 2007) that exceeded 250,000 hectares, 30,132 of which are located within Natura 2000 sites. In parallel, discussions included forest fire prevention and civil protection issues as the catastrophic fires in Peloponnese left behind 67 dead and thousands of homeless. Several projects, conferences, workshops and trainings followed in response to these catastrophic events. Some of them are presented below:

Projects

- WWF Greece, in early 2008 decided to take action and developed and secured the necessary funds from three major Greek foundations to implement the "Forests for the Future" project, one of the largest and most ambitious environmental project ever implemented by an NGO within Greece. The "Forests for the Future" project aimed to enhance forest protection in Greece nationally and locally, restore the wildfire affected areas, inform and mobilize citizens. It included multiple approaches and was structured in four axes of work: fieldwork, policy work, civil society engagement and scientific support and documentation. Regarding public participation in "Forests for the Future" project, about 84 forest fire protection voluntary schemes were supported, over 1,500 volunteers attended relevant trainings organized, about 11,500 students participated in forest fire related environmental education programme and 1,000 teachers attended training seminars. <http://www.wwf.gr/en/areas/forests>
- "FIREMENTOR: Design and decision make operational system for wildfire management", National funded project, PI: ISARS/NOA, 2003-2006. Fire Mentor project - [http://www.ntua.gr/old/gr\\_announce/170/parousiaseis170/files170/SYNEDRIA%20I/1102\\_presentation.pdf](http://www.ntua.gr/old/gr_announce/170/parousiaseis170/files170/SYNEDRIA%20I/1102_presentation.pdf)
- Life + project PINUS - LIFE+ project "Restoration of *Pinus nigra* forests on Mount Parnonas (GR2520006) through a structured approach" that addresses the need to restore this habitat type with the demonstration of the application of a structured, scientifically robust step-by-step approach, in order to plan accurately and restore effectively the burnt by the recent fires priority habitat type \*9530. The proposed restoration of the target habitat type will, also, contribute to the conservation of the southern distribution limits of the target habitat type in Europe – <http://www.parnonaslife.gr/>

- Life + project INFORM - The general objective of INFORM is to promote a knowledge base for national forest policy development and implementation, compatible with EU Initiatives and legislation, on Sustainable Forest Management (SFM) assessment and implementation monitoring, through MCPFE criteria and indicator estimations, including impact assessments on forests related to climate change – <http://www.inform-life.gr/index.php>
- Life + project Forest Cities – aims to study thoroughly what is being done for forest protection and the extinguishing of forest fires in the other south-Mediterranean European countries (Italy, Spain, S. France, Portugal and Cyprus) regarding the actions and powers of their local government and which of these can be practiced creatively in our country, according to the current institutional framework and any improvements - <http://forestcities.gr/>
- LIFE+ project ArcFUEL - involves six European Partners with the objective of producing updated fuel maps based on satellite data and field validation to be used in forest fire management operations – <http://www.arcfuel.eu/index.php/en/>
- LIFE+ project AdaptFor “Adaptation of forest management to climate change in Greece” – <http://en.life-adaptfor.gr/>
- Clim – Run project - aims at developing a protocol for applying new methodologies and improved modeling and downscaling tools for the provision of adequate climate information at regional to local scale that is relevant to and usable by different sectors of society (policymakers, industry, cities, etc.) – <http://www.climrun.eu/>
- CSR projects - fire trucks donation to fires Brigade and volunteer teams:
  - <http://auto.in.gr/news/greece/article/?aid=54891>
  - [http://www.bankofcyprus.com.cy/Cyprus\\_Gr/CSR\\_gr/Environment\\_gr/Environment\\_gr/Donation-of-fire-engines\\_gr/](http://www.bankofcyprus.com.cy/Cyprus_Gr/CSR_gr/Environment_gr/Environment_gr/Donation-of-fire-engines_gr/)
  - [http://www.fireservice.gr/pyr\\_ext/cms\\_files/dynamic/c32847/attach/0/4\\_el\\_GR.pdf](http://www.fireservice.gr/pyr_ext/cms_files/dynamic/c32847/attach/0/4_el_GR.pdf)

#### Conferences – workshops

- Forest Fires in Southern Europe and the Catalytic Experience of Greek Summer 2007 - [http://portal.tee.gr/portal/page/portal/SCIENTIFIC\\_WORK/anasigr/drasis/alo\\_foreis/524876EA9A195EACE0440003BA2D133C](http://portal.tee.gr/portal/page/portal/SCIENTIFIC_WORK/anasigr/drasis/alo_foreis/524876EA9A195EACE0440003BA2D133C)
- Ecological and & Social restoration of burnt areas - <http://www.forestry.gr/userfiles/file/pdf/PRAKTIKA%20DASOLOG%20low.pdf>
- Forest fire protection and primary sector - <http://www.ead.gr/portal/cc7146d26842552e/Obed3f05dbb255f9/e6d4e4ea99d1cdfb/f252b4014bf9f7ad.html>
- Forest fires – the case of Parnitha - [http://career-office.uoa.gr/downloads/praktika\\_hmeridas\\_0.pdf](http://career-office.uoa.gr/downloads/praktika_hmeridas_0.pdf)
- New approaches to the restoration of black pine forests - <http://www.parnonaslife.gr/txt/FINAL-BOOK0.pdf>
- Development of a Czech -Hellenic cooperation in environmental technologies and renewable energy - <http://blog.interaigis.gr/?p=1185>
- <https://dasarxeiofiles.files.wordpress.com/2015/03/programma.pdf>

- Services and products on preventive planning support to forest fires and post-fire floods -  
<http://www.fria.gr/prolipsi/files/ProsklisiKaiProgrammaHmeridas05062014.pdf>
- Forest Fires: Fuel Mapping in the Mediterranean countries -  
<http://www.arcfuel.eu/index.php/en/arcfuel-news/149-life10-envgr617-arcfuel.html>
- Proactive Human Response to Wildfires Outbreak: Measure and Prepare for It –  
[http://www.interreg4c.eu/agenda\\_prompt\\_finalconference.doc](http://www.interreg4c.eu/agenda_prompt_finalconference.doc)
- Fires 2007: From disaster to development -  
<http://www.aua.gr/gr/pyro/index.php>
- OUR RESPONSE TO FIRES - Collaborating for a better Chios -  
<http://www.fire.uni-freiburg.de/intro/Chios-Greece-Forest-Fire-Conference-15-16-Oct-2012-Agenda.pdf>
- Ecological processes in space and time - <http://www.synedra.gr/Synedria/10-5ecology/Files/Abstracts.pdf>
- Assessment of Forest Fire Risks and Innovative Strategies for Fire Prevention -  
[http://www.foresteuropa.org/documentos/FOREST\\_EUROPE\\_Forest\\_Fires\\_Report.pdf](http://www.foresteuropa.org/documentos/FOREST_EUROPE_Forest_Fires_Report.pdf)
- Forest Ecosystem & Landscape Restoration after natural disasters or other interventions – Demonstration of good Practices -  
<http://www.fria.gr/files/biblioperilipsewn13-10-2013.pdf>

#### Databases

- Diachronic Inventory of Forest Fires -  
[http://ocean.space.noa.gr/diachronic\\_bsm/index.php](http://ocean.space.noa.gr/diachronic_bsm/index.php)
- Pyroskopio – WWF Greece developed a web database of forest fires occurring in Greece that presents data on forest fires over the period 1983-2008. A total of 38.085 forest fires were studied, aiming to provide an overview of their evolution in the course of time based on temporal, topographic, meteorological and other parameters. Thus, useful conclusions can be extracted for research and operational use by the stakeholders in prevention and suppression of forest fires – <http://oikoskopio.gr/pyroskopio/en/index.php>
- CLIM-RUN – forest fires and climate change –  
<http://www.meteo.noa.gr/oikoskopio/index.php?lng=el-GR>

#### Documentary

THE FIRE FACTOR - An investigative documentary about the wildfires that devastated the Greek countryside in 2007. What factors led the fire to spin out of control? Why were the same mistakes repeated two years later with disastrous consequences in the outskirts of Athens? What can be done to prevent similar disasters in the future? Produced in association with WWF Greece and SKAI TV (a national TV channel) - <https://www.youtube.com/watch?v=xtntnP2mrUM>

#### Public protests:

The forest fire on Mt Parnitha took place in late June 2007. Many more fires took place throughout the summer that culminated in the tragic megafires in the Peloponnese in late August 2007. Following the Parnitha fire a spontaneous public

protest was organized via an SMS that circulated rapidly from one cell phone to the other. The spontaneity of the event has been recorded in online amateur youtube clips<sup>20</sup>, news clippings that are indicative of the period<sup>21</sup> and academic papers which try to interpret the public response<sup>22</sup>.

Since the first public protest in response to the fires several other initiatives took place. For example, a blogspot and mailing list was organized updating people more than 1000 people who were on the list on several initiatives taking place, public meetings, etc.<sup>23</sup> Moreover, WWF Greece together SKAI TV and Kathimerini (a national daily and Sunday newspaper) organized the Parnitha Observatory, in order to provide interested citizens with a communications means to report potential threat of further degradation or destruction of the affected burned areas. Few years later, the momentum remained strong and following a period that allowed the evaluation of the natural regeneration of the Parnitha forest, they organized together with the Management Body of the Parnitha National Park organized a pilot reforestation projects based on trained volunteers together, which continues to date (<http://parnitha.wwf.gr/>), building on the original 2007 momentum.

#### **R.5: Please provide evidence that Greeks consider protection of nature to be a right of citizens and a duty of the State and of the EU institutions.**

Article 24 of the Greek Constitution (1975/1998/2001) provides that: "*The protection of the natural and cultural environment constitutes a duty of the State and a right of every person. The State is bound to adopt special preventive or repressive measures for the preservation of the environment in the context of the principle of sustainable development...*"

As a result, Greeks consider these as fundamental principles of environmental protection policy. Since the majority of Greek environmental policy and legislation has its source in or is the result of the transposition of EU legislation, there is a clear sentiment that the EU has an important role in the protection of the environment, and nature in particular. This is evinced in the Eurobarometer survey results on the attitudes towards the environment, in which 62% of the respondents argue that decision on environmental protection should be taken jointly by the Greek government and the EU.<sup>24</sup> Even if a slight decrease of 6% is noted from the responses in 2011, Greeks continue being more supportive towards the EU than the EU average. The sentiment is further reflected given that 87% of the respondents totally agree that "environmental legislation is necessary for protecting the environment in Greece."

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<sup>20</sup> Few indicative such videos were generated from an online search for 2007 visuals:

<https://www.youtube.com/watch?v=AlhM4SEZGOo>; <https://www.youtube.com/watch?v=spGwhEdrrPI>;  
<https://www.youtube.com/watch?v=vwYuznvY2jA>

<sup>21</sup> Please see attached news clippings. These are from an English language newspaper that has since ceased to exist and are indicative.

<sup>22</sup> Tsaliki, L. 2010. "Technologies of Political Mobilization and Civil Society in Greece: The Wildfires of Summer 2007." *Convergence: The International Journal of Research into New Media Technologies* 16(2): 151–161.

<sup>23</sup> See indicative postings from the fall of 2007 calling people to action: <http://anadasosi.blogspot.gr/2007/09/mailling-list-anadasosi.html>; [http://anadasosi.blogspot.gr/2007/09/blog-post\\_05.html](http://anadasosi.blogspot.gr/2007/09/blog-post_05.html);  
[http://anadasosi.blogspot.gr/2007/09/blog-post\\_1438.html](http://anadasosi.blogspot.gr/2007/09/blog-post_1438.html).

<sup>24</sup> Attitudes towards the environment. Special Eurobarometer. 416. 2014.  
[http://ec.europa.eu/public\\_opinion/archives/ebs/ebs\\_416\\_fact\\_el\\_en.pdf](http://ec.europa.eu/public_opinion/archives/ebs/ebs_416_fact_el_en.pdf)

**C.2: The examples listed in the questionnaire answer are very interesting. Could you please provide documentary evidence in support of these examples for their inclusion in our analysis?**

For each of the examples mentioned in our response, documentary evidence is provided below:

SEA Directive: The SEA for the new Athens regional (also called “structural or “strategic”) plan was conducted by an agency that was later abolished – the “Organisation for the Structural Plan of Athens” (ORSA). A brief presentation of the strategic plan (in English) can be found here: [http://www.organismosathinas.gr/userfiles/file/%CE%A1%CE%A3%CE%91%202021/Parousiasi%20RSA\\_2021\\_ENGLISH\\_VERSION.pdf](http://www.organismosathinas.gr/userfiles/file/%CE%A1%CE%A3%CE%91%202021/Parousiasi%20RSA_2021_ENGLISH_VERSION.pdf). Another one is available here: [http://www.sume.at/webfm\\_send/122](http://www.sume.at/webfm_send/122). The webpage of the new regional plan (in Greek) can be found here: <http://www.organismosathinas.gr/Default.aspx?id=16>. The final SEA (in Greek) can be found here: <http://www.organismosathinas.gr/userfiles/file/%CE%A3%CE%9C%CE%A0%CE%95%20%CE%A1%CE%A3%CE%91%202021.pdf>. A typical map (large file) is available here: [http://www.organismosathinas.gr/userfiles/file/nomosrsa/XARTES%20RSA/04\\_P\\_ERIBALLON.pdf](http://www.organismosathinas.gr/userfiles/file/nomosrsa/XARTES%20RSA/04_P_ERIBALLON.pdf). The new plan was adopted by law in 2014 (Law 4277/2014/*Government Gazette* A 156).

National Planning Instruments: The planning instruments mentioned are the following:

- a. Joint Ministerial Decree (JMD) 12275/2014 on the modification of the JMD defining the areas where sand mining is prohibited (*Government Gazette* B 348/2014)
- b. Decision of the Governmental Committee on Planning and Sustainable Development 11508/2009 “Approval of the Special Framework for Planning and Sustainable Development of Industry and its Strategic Environmental Assessment” (*Government Gazette* AAP 151/2009)
- c. Decision of the Governmental Committee on Planning and Sustainable Development 24208/2009 “Approval of the Special Framework for Planning and Sustainable Development of Tourism and its Environmental Assessment” (*Government Gazette* B 1138/2009)

EIA Directive: Under Greek law, appropriate assessment is part of the EIA process, at least for projects subject to both (article 10 of Law 4014/2011). Currently, the content of the EIA is prescribed in Joint Ministerial Decree 170225/2014 “Specification of the content of environmental permitting files for Category A projects” (Official Journal B 135/2014). Whenever an appropriate assessment is required, EIA contains a “special ecological assessment” (i.e., an appropriate assessment) in a separate chapter. In SPA’s, an “ornithological study” replaces the “special ecological assessment”.

Water Framework Directive: The SEA for each completed RBMP (River Basin Management Plan) is available online (in Greek): [http://wfd.ypeka.gr/index.php?option=com\\_content&task=view&id=110&Itemid=18](http://wfd.ypeka.gr/index.php?option=com_content&task=view&id=110&Itemid=18).



**C.3: Could you provide more information on the Acheloos case, where the impacts on natural habitats and cultural heritage were jointly considered?**

The case concerned a water diversion project, which included dams, embankments, reservoirs and permanent submersion of certain areas. The cultural heritage which was affected included churches (notably the 17<sup>th</sup> century monastery of St. George Myrophyllos), several archaeological sites and many examples of traditional, "post-byzantine" architecture (notably stone bridges and water mills). The project also affected two SCI/SAC's (GR1440001 Aspropotamos and GR2310001 Delta Achelou), as well as one SPA (GR2110006, Koilada Achelou).

The Council of State has examined many legal issues under Directives 92/43 and 2009/147. Using the ECJ response from a preliminary reference (C-43/10), the Council of State ascertained that the works planned can only be carried out under the provisions of article 6(4). However, since no relevant alternative solutions have been studied, article 6(4) cannot be applied (the Council of State noted that the "alternative solutions" submitted by the government concern the final uses of the water, but not the affected Natura 2000 areas).

Turning to the protection of cultural heritage, the Council of State evaluated the protective measures proposed by the government: these included a retaining wall that will surround the monastery and the "inventorying" of affected sites of the area. With respect to one of the submerged bridges, the study expressed merely the "wish" that more options for its safeguard will be examined in the future. Evaluating those measures, the Council of State concluded that they do not guarantee an adequate protection of architectural heritage before the project initiation. Also, the lack of appropriate assessment and examination of alternatives under the Habitats directive also implies that the "statutory measures to protect" the architectural heritage" (as required by art. 3 of the Convention for the Protection of the Architectural Heritage of Europe) have not been taken.

It is important to note that throughout Greece, many important Greek monuments are located inside of near Natura 2000 areas: these include the temple of Neptune at Sounion and the Delphi archaeological complex, and the Meteora Greek Orthodox monasteries complex.

**C.10: Could you please provide us with the source of information used to compile Table provided in the response to Question C.10?**

The Ramsar sites were digitized by the Greek Biotope / Wetland Center for the Ministry of Environment during the 1990s and have since to be updated. All other IPA boundaries used were from the Common Database on Designated Areas (CDDA) of the EIONET which are also found on the national *Geodata.gov.gr* which is one of the Greek Government's open government initiatives.

The specific source of information is provided in the table below:

<b>International Protected Areas (IPAs)</b>	<b>Data source</b>	<b>URL</b>
Ramsar sites	GBWC	<a href="http://ekbygis.biodiversity-info.gr/map/index.html">http://ekbygis.biodiversity-info.gr/map/index.html</a>
Barcelona Convention	GBWC , CDDA2013	<a href="http://geodata.gov.gr/geodata/index.php">http://geodata.gov.gr/geodata/index.php</a> <a href="http://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-9">http://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-9</a>
Biogenetic Reserve	GBWC , CDDA2013	<a href="http://geodata.gov.gr/geodata/index.php">http://geodata.gov.gr/geodata/index.php</a> <a href="http://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-9">http://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-9</a>
Biosphere Reserve	GBWC , CDDA2013	<a href="http://geodata.gov.gr/geodata/index.php">http://geodata.gov.gr/geodata/index.php</a> <a href="http://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-9">http://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-9</a>
World Heritage Site	GBWC , CDDA2013	<a href="http://geodata.gov.gr/geodata/index.php">http://geodata.gov.gr/geodata/index.php</a> <a href="http://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-9">http://www.eea.europa.eu/data-and-maps/data/nationally-designated-areas-national-cdda-9</a>

**Furthermore, in many MS (e.g. the Netherlands), all of the Ramsar sites are also Natura 2000 sites. What is the reasoning for leaving out some Ramsar sites, Barcelona Convention Protected Areas and World Heritage Sites from the protection under Natura 2000 regime in Greece? Is there any available evidence concerning this issue?**

Slight differences observed in % overlap between International Protected Areas and the Natura 2000 network arise from digitization issues rather than differences in actual site boundaries as such. Digitized boundaries should be updated at some point in the future, using more detailed basemaps.