

14 October 2025

**Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the sixth payment request for non-repayable support submitted by Greece on 18 July 2025, transmitted to the Economic and Financial Committee by the European Commission**

**Executive summary**

In accordance with Article 24(2) of Regulation (EU) 2021/241, on 18 July 2025, Greece submitted a request for payment for the sixth instalment of the non-repayable support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Greece provided due justification of the satisfactory fulfilment of the 39 milestones and targets of the sixth instalment of the non-repayable support, as set out in Section 3.1 of the Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece<sup>1</sup>.

For 2 targets covering a large number of beneficiaries, in addition to the summary documents and official listings provided by Greece, Commission services have assessed a statistically significant sample of individual files. The sample size has been set at 60 for one target, and at 69 for the other target, which corresponds to a confidence level of 95% or above in these cases.

In its payment request, Greece has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary. Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Greece, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 39 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Greece's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, energy efficiency interventions, social benefits, financial sector measures, the justice system, personal doctors, and tax policy. The milestones and targets also confirm progress towards the completion of investment projects related to areas such as renewable hydrogen, tourism development, industrial business parks, and digital transformation of education.

By the transmission of this positive preliminary assessment and in accordance with Article 24(4) of Regulation (EU) 2021/241, the Commission asks for the opinion of the Economic and Financial Committee on the satisfactory fulfilment of the relevant milestones and targets.

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<sup>1</sup> ST 10152 2021 INIT and ST 10152 2021 ADD 1, as amended by 15831/1/23 REV 1 and 15831/23 ADD 1 REV 1, by ST 17055 2024 INIT and ST 17055 2024 ADD 1 COR 1, and by ST 11101/25 and ST 11101/25 ADD 1, not yet published.

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## Non-repayable support

**Number and name of the Target:** 8 RES account - capacity increase target 3

**Related Measure:** 1,1.16865 Restructuring and enhancement of the RES CHP Account revenues

**Quantitative Indicator:** New capacity (GW) of renewable energy sources put in operation

**Baseline:** 2

**Target:** 3

**Time:** Q2 2024

### 1. Context:

The reform consists of the restructuring and enhancement of the RES CHP Account (renewable energy sources – combined heat and power), which constitutes the main support scheme for RES production in Greece. The reform measure includes an increase of 3 Gigawatt in the electricity production capacity from renewable energy sources.

Target 8 requires a total of 3 Gigawatt of new RES capacity to have been installed and operational.

Target 8 is the fifth and last milestone or target of the reform. As concerns the specific part of the reform to add new RES, it follows the completion of target 6 and target 7, which added 2 GW of new RES.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                      | Short description                                                                                                                                                                                                                                                                                                                    |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                      |
| 2 | Certification of installation by the Renewable Energy Sources Operator & Guarantees of Origin (hereinafter referred to as "DAPEEP SA")<br>DAPEEP – EXE (ΔΑΠΕΕΠ – ΕΞΕ) - 7804/23.05.2025                                                                                   | A certification issued by DAPEEP SA confirming the new RES capacity that have been installed and operational.                                                                                                                                                                                                                        |
| 3 | Law No. 4001/2011 "For the operation of Electricity and Natural Gas Energy Markets, for Research, Production and Transmission Networks of Hydrocarbons and other provisions"<br><br>Published in the Official Journal A 179/22.08.2011 (entry into force: 22 August 2011) | This law sets out the overall regulatory framework for the liberalised electricity and natural gas markets in Greece, including market operation, supervision, and consumer rights. Article 118 specifies the legal basis for DAPEEP SA's establishment, role, and responsibilities as the Operator of RES and Guarantees of Origin. |
| 4 | Law No. 4414/2016 "New support scheme for power plants from Renewable Energy Sources and High-Efficiency Cogeneration – Provisions for the legal and functional                                                                                                           | This law introduces the support scheme for RES and High-Efficiency CHP plants through competitive procedures and market integration. Article 12 mandates DAPEEP SA to maintain the national register for all RES and CHP plants,                                                                                                     |

|   |                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                       |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | separation of supply and distribution in the natural gas market and other provisions"<br><br>Published in the Official Journal A 149/09.08.2016 (entry into force: 9 August 2016)                                                                        | including detailed information on capacity and production.                                                                                                                                                            |
| 5 | Code of the DAPEEP SA, Version 4.0, approved by the Regulatory Authority for Energy, Waste and Water (hereinafter referred to as "RAAEY") Decision E-47/2023<br><br>Published in the Official Journal B 4325/06.07.2023 (entry into force: 12 July 2023) | The DAPEEP SA Code defines the operational framework, processes, and obligations of DAPEEP SA in managing settlements and guarantees of origin for RES/CHP. DAPEEP SA's supervision by RAAEY is set out in Article 4. |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target.

#### **New RES capacity installed and operational.**

According to the certification from the Managing Body for the RES account and competent authority for Guarantees of Origin, (hereinafter referred to as "DAPEEP SA"), to the Greek Ministry of Energy and Environment (evidence 2), the capacity of RES projects that was put into operation after 1 January 2021 amounts to 7,549.60 MW. According to the evidence provided, Greece completed the installation of 7,549.60 MW of new RES that was put into operation after 1 January 2021. Through putting into operation 7,549.60 MW of new RES after 1 January 2021, Greece is thus exceeding the goal of Target 8 (the target under assessment) by 4,549.60 MW.

DAPEEP SA is officially designated as the national authority responsible for maintaining the register of all RES and High-Efficiency CHP plants in Greece, according to Article 118 of Law 4001/2011 (evidence 3) and Article 12a(6) of Law 4414/2016 (evidence 4). The DAPEEP SA Code (evidence 5) defines the operational framework, processes, and obligations of DAPEEP SA in managing settlements and guarantees of origin for RES/CHP and Article 4 of the DAPEEP SA code sets out its supervision by the Regulatory Authority for Energy, Waste and Water RAAEY.

Finally, as Target 8 is the last milestone/target of this measure, it is confirmed that all binding elements in the measure description were previously assessed in the framework of the previous milestones/targets.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 10 Land rehabilitation - urban plans

**Related Measure:** 1.1. Power up - 16871 Revitalization actions of the most affected territories (Just transition territories)

**Qualitative Indicator:** Approval of Special Urban Plans by the Central Council of Town Planning Issues and Disputes; Land rehabilitation (ha) completed and certified by the Independent Certifier

**Time:** Q1 2024

### 1. Context:

The objective of this investment is to support the land rehabilitation in the areas of former lignite mines in Western Macedonia and Megalopolis (Just Transition Areas). In particular, this is done through environmental and economic interventions, such as soil remediation, redevelopment and implementation of interventions regarding landscape and environment restoration, readjustments in land uses, and the creation of organised receptors of activities.

First, Special Urban Plans, defining permitted land uses, the general building conditions and restrictions and any other required measure, term or restriction, should be approved by the Central Council of Town Planning Issues and Disputes. Second, according to Paragraph 6.5.3 of the framework agreement – ratified by Law 4956/2022, PPC SA shall launch a call to the contracting parties (Metavasi SA), for the acceptance of 5 438 ha of restored or undisturbed land followed by the certification by the Independent Certifier.

Milestone 10 is the second milestone of the investment, and it follows the completion of milestone 9. It will be followed by target 15, related to the acceptance of restored or undisturbed land. The investment has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                  | Short description                                                                                                                                                             |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Approval by the Central Council of Town Planning Issues and Disputes<br>Date: 18 November 2024<br>16 <sup>th</sup> Meeting<br>Act: 76                 | The Council decided the Approval of the Special Urban Plan of Ptolemaida following the relative recommendation of the Ministry of Environment                                 |
| 2 | Approval by the Central Council of Town Planning Issues and Disputes<br>Date: 18 November 2024<br>16 <sup>th</sup> Meeting<br>Act: 77                 | The Council decided the Approval of the Special Urban Plan of Megalopolis following the relative recommendation of the Ministry of Environment                                |
| 3 | Approval by the Central Council of Town Planning Issues and Disputes<br>Date: 18 November 2024<br>16 <sup>th</sup> Meeting<br>Act: 78                 | The Council decided the Approval of the Special Urban Plan of Amyntaio following the relative recommendation of the Ministry of Environment                                   |
| 4 | Call by PPC for the acceptance of 987,0 hectares of undisturbed land<br>09 July 2024<br>Αρ. ΔΜΕΠΟ / Ε.Κ. 106105/800<br>(ΕΙΣΧ ΜΕΤΑΒΑΣΗ 165/09.07.2024) | According to Law 4956/2022 Article 6.5.3 PPC sent the 1st Call for acceptance of 987,0 hectares of undisturbed and rehabilitated land in the areas of Amyntaio and Ptolemaida |
| 5 | Call by PPC for the acceptance of 1337,0 hectares of undisturbed and rehabilitated land                                                               | According to Law 4956/2022 Article 6.5.3 PPC sent the 2nd Call for acceptance of 1337,0 hectares of undisturbed and                                                           |

|    |                                                                                                                                                                                |                                                                                                                                                                                                      |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | 19 August 2024<br>Αρ. ΔΜΕΠΟ / Ε.Κ. 125089/955<br>(ΕΙΣΧ ΜΕΤΑΒΑΣΗ 194/20.08.2024)                                                                                                | rehabilitated land at the areas of Amyntaio, Kleidi, Ptolemaida and Megalopolis                                                                                                                      |
| 6  | Call by PPC for the acceptance of 1867,3 hectares of undisturbed and rehabilitated land<br>01 October 2024<br>Αρ. ΔΜΕΠΟ / Ε.Κ. 145248/1146<br>(ΕΙΣΧ ΜΕΤΑΒΑΣΗ 253/01.10.2024)   | According to Law 4956/2022 Article 6.5.3 PPC sent the 3rd Call for acceptance of 1867,3 hectares of undisturbed and rehabilitated land in the areas of Amyntaio and Ptolemaida                       |
| 7  | Call by PPC for the acceptance of 1336,95 hectares of undisturbed and rehabilitated land<br>04 November 2024<br>Αρ. ΔΜΕΠΟ / Ε.Κ. 162354/1287<br>(ΕΙΣΧ ΜΕΤΑΒΑΣΗ 317/04.11.2024) | According to Law 4956/2022 Article 6.5.3 PPC sent the 4th Call for acceptance of 1336,95 hectares of undisturbed and rehabilitated land at the areas of Amyntaio, Kleidi, Ptolemaida and Megalopolis |
| 8  | 1 <sup>st</sup> Certification Report corresponding to the 1 <sup>st</sup> Call by PPC<br>(ΕΙΣΧ ΜΕΤΑΒΑΣΗ 210/05.09.2024)                                                        | Detailed document for the Certification of 979,39 hectares of undisturbed land.                                                                                                                      |
| 9  | 2 <sup>nd</sup> Certification Report corresponding to the 2 <sup>nd</sup> Call by PPC<br>(ΕΙΣΧ ΜΕΤΑΒΑΣΗ 329/07.11.2024)                                                        | Detailed document for the Certification of 1314,29 hectares of undisturbed and rehabilitated land.                                                                                                   |
| 10 | 3 <sup>rd</sup> Certification Report corresponding to the 3 <sup>rd</sup> Call by PPC<br>(ΕΙΣΧ ΜΕΤΑΒΑΣΗ 021/30.01.2025)                                                        | Detailed document for the Certification of 1864,68 hectares of undisturbed and rehabilitated land.                                                                                                   |
| 11 | 4 <sup>th</sup> Certification Report corresponding to the 4 <sup>th</sup> Call by PPC<br>(ΕΙΣΧ ΜΕΤΑΒΑΣΗ 079/05.03.2025)                                                        | Detailed document for the Certification of 1320,76 hectares of undisturbed and rehabilitated land.                                                                                                   |
| 12 | Decision by the BoD of METAVASI SA for the issuance of a Certificate of Final Acceptance corresponding to the 1st Certification Report (59/17.09.2024)                         | Decision by the BoD of METAVASI SA for the issuance of a Certificate of Final Acceptance of 979,39 hectares of undisturbed land corresponding to the 1st Certification Report                        |
| 13 | Decision by the BoD of METAVASI SA for the issuance of a Certificate of Final Acceptance corresponding to the 2nd Certification Report (1/22.11.2024)                          | Decision by the BoD of METAVASI SA for the issuance of a Certificate of Final Acceptance of 1314,29 hectares corresponding to the 2nd Certification Report                                           |
| 14 | Decision by the BoD of METAVASI SA for the issuance of a Certificate of Final Acceptance corresponding to the 3rd Certification Report (3/03.02.2025)                          | Decision by the BoD of METAVASI SA for the issuance of a Certificate of Final Acceptance of 1864,68 hectares corresponding to the 3rd Certification Report                                           |
| 15 | Decision by the BoD of METAVASI SA for the issuance of a Certificate of Final Acceptance corresponding to the 4th Certification Report (3/20.03.2025)                          | Decision by the BoD of METAVASI SA for the issuance of a Certificate of Final Acceptance of 1320,76 hectares corresponding to the 4th Certification Report                                           |
| 16 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                 |                                                                                                                                                                                                      |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**1) Approval of the Special Urban Plans by the Central Council of Town Planning Issues and Disputes. The Special Urban Plans shall define permitted land uses, the general building conditions and restrictions and any other required measure, term or restriction.**

The Central Council of Town Planning and Disputes approved the Special Urban Plans for Ptolemaida (evidence 1), Megalopolis (evidence 2) and Amyntaio (evidence 3). In the approval of the three Special Urban Plans (evidence 1 to 3), the permitted land uses and the building conditions and restrictions are defined in pages 1 to 5. Any other required measure, term or restriction is defined by the ratification of the forest map (Law 998/79) where the provisions of the forest law apply (page 3 of evidence 1 to 3).

**2) Call by PPC SA (according to Paragraph 6.5.3 of the framework agreement – ratified by Law 4956/2022) to the contracting parties, for the acceptance of 5 438 ha of restored or undisturbed land followed by the certification by the Independent Certifier.**

In accordance with paragraph 6.5.3 of the Framework Agreement, ratified by Law 4956/2022, PPC SA launched four calls (evidence 4 to 7) to notify METAVASI SA, the contracting party, for the latter to accept undisturbed and restored land. METAVASI SA is a Greek state-owned company focused on managing and developing areas affected by the country's lignite phase-out. Essentially, they are responsible for repurposing and revitalizing areas transitioning away from lignite mining.

Following the call of PPC SA for the acceptance of the land, the Independent Certifier, Level and Eco Efficiency (page 14 of evidence 8 to 11), issued four Certification Reports for the certification of land rehabilitation works in 5 479 hectares (slightly higher than the objective of 5 438 hectares), which is detailed in the following table.

|                                                                                             | CERTIFIED LAND (square meters) |                 |                    |
|---------------------------------------------------------------------------------------------|--------------------------------|-----------------|--------------------|
| <b>Certification Report - 1st Call for Acceptance</b><br>10_16871_I_Certification Report_01 | Amyntaio                       | 1,386,422       | Summary page xv    |
|                                                                                             | Ptolemaida                     | 8,407,525       | Summary page xv    |
|                                                                                             | <b>Total</b>                   | 9,793,947       | Summary page xv    |
| <b>Certification Report - 2nd Call for Acceptance</b><br>10_16871_I_Certification Report_02 | Amyntaio                       | 7,963,290       | Summary page xxix  |
|                                                                                             | Ptolemaida                     | 2,414,352       | Summary page xxx   |
|                                                                                             | Kleidi                         | 129,000         | Summary page xxx   |
|                                                                                             | Megalopolis                    | 2,636,284       | Summary page xxx   |
|                                                                                             | <b>Total</b>                   | 13,142,926      | Summary page xxx   |
| <b>Certification Report - 3rd Call for Acceptance</b><br>10_16871_I_Certification Report_03 | Amyntaio                       | 8,529,400       | Summary page xvii  |
|                                                                                             | Ptolemaida                     | 10,117,400      | Summary page xvii  |
|                                                                                             | <b>Total</b>                   | 18,646,800      | Summary page xvii  |
| <b>Certification Report - 4th Call for Acceptance</b><br>10_16871_I_Certification Report_04 | Amyntaio                       | 2,616,900       | Summary page xxvii |
|                                                                                             | Ptolemaida                     | 3,766,700       | Summary page xxvii |
|                                                                                             | Megalopolis                    | 6,824,000       | Summary page xxix  |
|                                                                                             | <b>Total</b>                   | 13,207,600      | Summary page xxix  |
|                                                                                             | <b>SUM</b>                     | 54,791,273 sq.m |                    |

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|                       |
|-----------------------|
| <b>5,479 hectares</b> |
|-----------------------|

METAVASI SA issued four decisions (evidence 12 to 15) on the issuance of Certificates of Final Acceptance of 5.479 hectares.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 31 Adoption of maritime strategy

**Related Measure:** 1,2.16891 Establishment of new maritime spatial planning

**Qualitative Indicator:** New maritime spatial strategy adopted

**Time:** Q2 2024

### 1. Context:

The reform concerns the creation of the national maritime spatial strategy which shall address sustainable development in the maritime areas and coastal zones, while protecting the marine environment and biodiversity.

The milestone concerns the adoption of the strategy.

Milestone 31 is the only milestone of this reform, related to the adoption of the maritime spatial strategy. The reform has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                            | Short description                                                                       |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled                                                                       |                                                                                         |
| 2 | Ministerial Council Act no. 6 of 17 April 2025 approving the National Spatial Strategy for the Maritime Area (Official Journal D'/227/17.04.2025)<br>Date of entry into force is 17 April 2025. | Ministerial Council Act which adopts the National Maritime Spatial Strategy             |
| 3 | Law no. 4759/2020 of 9 December 2020 on Modernization of Spatial and Urban Planning Legislation (Official Gazette A' A 245/9.12.2020)                                                           | Law setting out, among others, the adoption procedure for the Maritime Spatial Strategy |

### 3. Analysis:

The Commission considers that there is a clerical error in the text of the Council Implementing Decision as regards the description of milestone 31 and has undertaken the assessment on a revised basis. In such description, it is stated "Adoption by the Ministry of Environment and Energy of the maritime spatial strategy". However, Article 22(2) of the law no. 4759/2020 of 9 December 2020 on Modernization of Spatial and Urban Planning Legislation (evidence 3) states that the national spatial strategy for the marine space shall be approved by an Act of the Council of Ministers, which is issued following a proposal by the Minister of Environment and Energy. Therefore, the description should state that the maritime spatial strategy shall be adopted by the Council of Ministers instead of the Minister of Environment and Energy. Against this background, the justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

### Adoption by the Ministry of Environment and Energy of the maritime spatial strategy.

Greece provided as evidence a copy of the Ministerial Council Act no. 6 of 17 April 2025 which adopted the National Maritime Spatial Strategy (evidence 2).

Furthermore, in line with the description of the measure, **the strategy shall address sustainable development in the maritime areas and coastal zones, while protecting the marine environment and biodiversity.**

The strategy sets spatial rules for key sectors, addressing environmental, social, and economic objectives. In particular, Article 2 defines strategic directions for a spatial allocation of human activities in marine and coastal areas to ensure sustainable economic growth, increase employment, respect the marine environment and biodiversity and mitigate the impact of climate change.

Article 3 sets the directions for the spatial allocation of marine areas for aquaculture, offshore renewable energy, sustainable tourism, marine protected areas, and maritime transport, and includes provisions to mitigate underwater noise, control invasive species, protect seascape, restore degraded marine ecosystems and preserve ecologically valuable marine habitats. Furthermore, Article 4 introduces guiding principles to ensure the compatibility of human activities with the economic and ecological capacity of each marine area.

Article 5 provides guidance for carrying out economic activity in National Marine Parks, Natura 2000 Marine Protected Areas, and areas where biodiversity is protected by law. It also provides specific guidance for marine transport, marine tourism, fishing, aquaculture, and offshore renewable energy, while protecting the marine environment.

Articles 6-12, present the framework for complementarity between marine spatial planning and established land spatial plans and a relevant management and coordination mechanism, and set the directions for embedding environmental impact assessment into marine spatial planning.

Lastly, Articles 13 & 14 set the principles for developing marine spatial plans including the rules and conditions for defining appropriate marine areas respecting the marine environment and biodiversity. The strategy prioritizes environmental protection and biodiversity conservation as a fundamental condition for any economic development in marine zones.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 113 Completion of Central Document Management System Project

**Related Measure:** 2,2.16738 Central Document Management System

**Qualitative Indicator:** Final report by the Ministry of Digital Governance documenting the completion of the Central Document Management System

**Time:** Q2 2024

#### 1. Context:

The investment consists of the implementation of a Central Document Management system which shall capture, store, and retrieve paper and electronic documents. This system shall facilitate interoperability between public sector organisations and aiming to accelerate the processing of citizens' and businesses' cases and service requests. The investment includes a) the supply of 20 000 approved remote digital signatures b) application development for interoperability, the creation of a unique QR code or ID to be embedded in the documents c) development of subsystems to cover the government needs for signing documents with digital signatures d) support services (including services for the development of studies), training and helpdesk services.

Milestone 113 concerns the Central Document Management System being operational, including the supply of 20 000 approved remote digital signatures, supported by applications and a help desk.

Milestone 113 is the only milestone of this investment. The implementation of the investment shall be completed by 30 June 2024.

#### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                    | Short description                                                                                                                                                                                                          |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                          |                                                                                                                                                                                                                            |
| 2 | Ministerial Decision 21145 EΞ 2022 launching the operation of the Central Document Management System (Official Journal B' 2764/03.06.2022)                                                                                                                                                              | Ministerial Decision launching the operation of the Central Document Management System.<br><br>Dated 03 June 2022.                                                                                                         |
| 3 | Ministerial Decision 33366 EΞ 2022 for the Provision of Web Services to the Central Document Management System of the Ministry of Digital Governance, via the Interoperability Center of the General Secretariat for Information Systems of Public Administration (Official Journal B' 4108/02.08.2022) | Ministerial Decision on the Activation of Interoperability with public servant registries for holders of either Passports or Special Identity Cards, for the issuance of digital certificates<br><br>Dated 02 August 2022. |
| 4 | Digital Certifications serial numbers                                                                                                                                                                                                                                                                   | List of the serial numbers of the digital certificates which were issued in the project                                                                                                                                    |
| 5 | Deliverable Π19 of Phase 1                                                                                                                                                                                                                                                                              | Deliverable Phase 1 regarding the Implementation Study                                                                                                                                                                     |
| 6 | Deliverable Π20 of Phase 2                                                                                                                                                                                                                                                                              | Deliverable of Phase 2 regarding Application Implementation                                                                                                                                                                |
| 7 | Deliverable Π21 of Phase 3                                                                                                                                                                                                                                                                              | Deliverable of Phase 3 regarding Acceptance Tests                                                                                                                                                                          |

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| 8  | Deliverable Π22 of Phase 4                                                                                                                                                                     | Deliverable of Phase 4 regarding Pilot Operation Period                                                                                                                                                                |
| 9  | Deliverable Π23 of Phase 5                                                                                                                                                                     | Deliverable of Phase 5 regarding Training services                                                                                                                                                                     |
| 10 | Contracting Authority's (Ministry of Digital Governance) Decision of Completion and Acceptance of Phase 1 Deliverables (protocol number: 33370 ΕΞ 2022/01-08-2022-ADA: 6ΨΤΞ46ΜΤΛΠ-614).        | Contracting Authority's (Ministry of Digital Governance) Phase 1: Implementation Study, Decision of Completion and Acceptance of Deliverables<br><br>Dated 01 August 2022                                              |
| 11 | Contracting Authority's (Ministry of Digital Governance) Decision of Completion and Acceptance of Phases 2 and 3 Deliverables (protocol number: 23848 ΕΞ 2023/15-05-2023-ADA: ΨΙ2Ε46ΜΤΛΠ-ΧΕΠ). | Contracting Authority's (Ministry of Digital Governance) Phase 2: Application Implementation and Phase 3 Execution of Acceptance Tests, Decision of Completion and Acceptance of Deliverables<br><br>Dated 15 May 2023 |
| 12 | Contracting Authority's (Ministry of Digital Governance) Decision of Completion and Acceptance of Phases 4 and 5 Deliverables (protocol number: 49365 ΕΞ 2023/14-11-2023 ADA: ΨΘΤΨ46ΜΤΛΠ-Μ84). | Contracting Authority's (Ministry of Digital Governance) Phase 4: Pilot Operation Period and Phase 5 Training services, Decision of Completion and Acceptance of Deliverables<br><br>Dated 14 November 2023            |
| 13 | Project Contract contract code: 2/2019, Date signed: 23-12-2021, ADAM: 21SYMV009858583 2021-12-28 (option)                                                                                     | The contract is option procurement of the main project contract aiming to enhance the services provided to public servants, public agencies and the members of the government.                                         |
| 14 | Amendment of contract 2/2019<br>Date signed: 28-4-2023, ADAM: 23SYMV012683710 2023-05-16                                                                                                       | Contract Amendment<br><br>Dated 28 April 2023                                                                                                                                                                          |
| 15 | The techno-economic offer submitted by the contractor serving as an Annex to the contract.                                                                                                     | Annex D of the project contract specifies the physical scope of the contract, the deliverables and timeline of implementation.<br><br>Dated 11 November 2021                                                           |
| 16 | Report by the Ministry of Digital Governance<br>Protocol Number: 22206 / 07.07.2025                                                                                                            | Completion Report of the Central Document Management System signed by the Minister of Digital Governance<br><br>Dated 07 July 2025                                                                                     |

### 3. Analysis:

The justification and substantiating evidence provided by the Greece authorities cover all constitutive elements of the milestone.

#### **The Central Document Management System is operational.**

Furthermore, in line with the description of the measure, the investment consists of the implementation of a **Central Document Management System which shall capture, store, and retrieve paper and electronic documents.**

The Central Document Management System was put into operation on 3 June 2022 in accordance with the Ministerial Decision 21145 2022 (evidence 2), Article 1 to Article 9.

The project was completed on 14 November 2024 with the Certificate of Acceptance signed by the Minister of Digital Governance, approving the final acceptance protocol of the last phases of the project i.e. Phase 4 "Pilot Operation Period" and Phase 5 "Training Services" (evidence 10-12).

The Commission services conducted an on-the-spot check on 10 December 2024, to verify the central document management system is functional and facilitates the electronic circulation of documents within the public administration. This check was completed successfully, confirming that the central document management system facilitates the electronic circulation of documents within the public administration, including capturing, storing and retrieving documents.

**Including the supply of 20 000 approved remote digital signatures.** Furthermore, in line with the description of the measure, **the investment includes a) the supply of 20 000 approved remote digital signatures.**

Within the project, 50 000 approved remote digital signatures were procured and 52.958 were finally issued.

Greece has supplied three types of evidence showing fulfilment of this requirement.

Firstly, the list of the serial numbers of the digital certificates issued in the project, totalling to over 50,000 (evidence 4).

Secondly, the deliverables of the five implementing phases, which have all been successfully completed by 14 November 2024. Phase 4 concerned the approved remote digital signatures becoming operational in a pilot operating period. Phase 4: the Pilot Operation (evidence 8), page 37-38, provides details of the pilot-operation in which the approved remote digital signatures became operational. In page 38, it is mentioned that for the operation of the remote digital signature service until December 31, 2026, new cryptographic devices were installed at the two equipment locations. Additionally, it is stated that the total number of digital certificates issued and delivered is 51,772, which includes the reissued 272 certificates that initially had an incorrect expiration date on 17 September 2026 instead of 19 December 2026.

The Certificates of Acceptance signed by the Minister of Digital Governance, approving the acceptance protocols of phases 1 to 5 (evidence 10-12), demonstrate the formal acceptance of all phases by the relevant Ministry.

The Commission services conducted an on-the-spot check on 28 July 2025 to verify that the 20 000 approved remote digital signatures were held within the central document management system. This check was completed successfully, confirming that over 20 000 approved remote digital signatures are held within the system.

Furthermore, in line with the description of the measure, **this system shall facilitate interoperability between public sector organisations. [...] The investment includes [...]b) application development for interoperability, the creation of a unique QR code or ID to be embedded in the documents.**

Greece has supplied evidence that the interoperability services were delivered. This is demonstrated in Phase 2: Implementation of Applications (evidence 6) pages 71-87, which details the operational integration of interoperability services. Specifically, interoperability was developed for the issuance of digital certificates for public servants who hold either Passports or Special Identity Cards, enabling them to digitally sign documents. These digital signatures are automatically recognised as authentic by other public service organisations, enabling interoperability of digital signatures between public sector organisations. Interoperability services were developed between Central Document Management system and the registries of: Hellenic Passports, Hellenic Coast Guard, Hellenic Fire Service, Ministry of National Defence, Hellenic Police. On 2 August 2022, the operation of these interoperability services was launched, as proven with Ministerial Decision 33366 (evidence 3), pages 41827-41828.

The Certificates of Acceptance signed by the Minister of Digital Governance, approving the acceptance protocols of phases 1 to 5 (evidence 10-12), demonstrate the formal acceptance of all phases by the relevant Ministry.

The evidence provided proves the implementation of unique QR codes that can be embedded in the documents. The QR codes can be scanned by another public service entity to access the documents, enabling interoperability between public sector organisations. The QR codes were implemented in Phase 2: Implementation of Applications (evidence 6), pages 101, which states that the QR Code Production Application and QR Code Scanner have been developed. Phase 2 (pages 101-114) details the service developed for public bodies that produces a unique QR code identifier to be added to the documents they issue and the possibility of checking its validity to citizens and bodies.

The Certificates of Acceptance signed by the Minister of Digital Governance, approving the acceptance protocols of phases 1 to 5 (evidence 10-12), demonstrate the formal acceptance of all phases by the relevant Ministry.

The Commission services conducted an on-the-spot check on 28 July 2025 to verify the development of applications for i) the issuance of digital certificates for public servants who hold either Passports or Special Identity Cards, and ii) creation of unique QR codes that can be embedded in the documents. This check was completed successfully, confirming that Greece has developed applications for the issuance of digital certificates for public servants who held Government IDs, allowing them to digitally sign documents, and that Greece has developed an application to create and embed unique QR codes into documents.

Furthermore, in line with the description of the measure, **the investment includes [...] c) development of subsystems to cover the government needs for signing documents with digital signatures.**

An online signature collection platform was delivered, called an eCabinet system, to enable Ministers to sign documents with approved remote digital signatures. The platform interoperates with the approved remote digital signatures procured by the project, for signing the documents.

This is demonstrated in Phase 4: Pilot Operating Period (evidence 8), pages 51-53, which refers to the eCabinet system of digital signatures by Ministers. This is in line with Phase 2: Implementation of Applications (evidence 6), pages 115-130, which describes the implementation of the eCabinet signature collection platform.

*The Commission services conducted an on-the-spot check on 28 July 2025 to verify the operation of the eCabinet system. This check was completed successfully, confirming that the application enables the government to sign documents with digital signatures.*

**Supported by applications and a help desk.**

Furthermore, in line with the description of the measure, **the investment includes [...]d) support services (including services for the development of studies), training and helpdesk services.**

Greece has supplied evidence that the support services, training and helpdesk were provided to support the project.

*Development of studies*

Phase 1: Implementation Study (evidence 4) concerns the implementation study of interoperability with remote digital signatures as well as a help desk.

*Training*

Phase 5: Education Services (evidence 9), page 13-25, provides details on the training programme, including the training hours per user group. Phase 5 started with the signature of the contract on 24 December 2021 and completed with the first submission the report on the training services (Evidence 9) on 7 July 2023. The contract (evidence 13-15) further demonstrates that training services were provided by the contractor, at pages 16 –17, which outline the remote training platform during the pilot phase, and the education services.

*Helpdesk*

Phase 5: Education Services (evidence 9) also provides information on the help desk team that was provided by the contractor, to ensure the connectivity of learners' personal computing systems. It describes the application and requirements to be developed and/or delivered under the sub projects.

Within the framework of the project, from 7 January 2022 to 31 January 2024, help desk services were provided to the users of the Central Document Management System by the support office which was staffed and operated by the Contractor according to the contract (Evidence 11-14). The Annex to the contract (Evidence 15) demonstrates that the help desk operated Monday to Friday from 07:00 to 22:00, and Saturday from 08:00 to 16:00, excluding holidays, and operated for at least 18 months. Communication channels included email, telephone, and a support request submission system.

Greece provided the Certificates of Acceptance signed by the Minister of Digital Governance, approving the acceptance protocols of phase 5 (evidence 12), which demonstrate the formal acceptance of by the relevant Ministry.

**4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 122 Completion of Central Cloud computing infrastructure and service

**Related Measure:** 2,2.16853 Supply of Central Cloud Computing Infrastructure and Service

**Qualitative Indicator:** Report by the Ministry of Digital Governance documenting the completion of the set-up of all project components and parametrize infrastructure for the central cloud computing infrastructure and services project.

**Time:** Q2 2024

### 1. Context:

The investment shall deliver a modern Hybrid Cloud Infrastructure consisting of two tenants: One for the G-Cloud and another one for the H-Cloud. Each tenant shall have the private cloud component and the public cloud component in a unified management and service delivery environment. The implementation of the investment shall be completed by 30 June 2024.

The Data Centres of the Cloud Services Provider shall be required to comply with the “European Code of Conduct on Data Centre Energy Efficiency”. The requirement is in alignment with Regulation (EU) 2018/1999.

Milestone 122 requires the beginning of operations of all project components and parametrize infrastructure for the central cloud computing infrastructure and services project, including virtual machines and networks (infrastructure as a service), platform as a service, two edge computing arrays, two special interfaces of high speed optical fibre and training and support services for the overall project.

Milestone 122 is the only milestone of this investment. The investment has a final expected date for implementation of 30 June 2024.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                     | Short description                                                                                                                                                                                                                                                                                       |
|---|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled           |                                                                                                                                                                                                                                                                                                         |
| 2 | International Open Tender for the Provision of Cloud Infrastructure and Services (Cloud Services).<br>(ADAM: 22PROC011196402 2022-09-06) | Concerns the procurement of cloud infrastructure and services to support the Greek public sector’s digital transformation through the G-Cloud and H-Cloud platforms, under the Recovery and Resilience Facility.<br><br>Dated 6 September 2022.                                                         |
| 3 | Project Contract<br>(code: 2197).<br>Signed on 20 June 2023<br><br>ADAM: 23SYMV012917899 2023-06-20                                      | The contract for Subproject 1 of the Action “Provision of Cloud Computing Infrastructure and Services,” aiming to ensure the business continuity of critical government IT systems hosted within the Greek Government Cloud (G-Cloud) and the Health Sector Cloud (H-Cloud).<br><br>Dated 20 June 2023. |
| 4 | 1 <sup>st</sup> Amendment of contract 2197.<br>Signed on 29 August 2023                                                                  | 1 <sup>st</sup> modification of contract of subproject 1 signed on 29 August 2023                                                                                                                                                                                                                       |

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|    | [ADAM: 23SYMV013315554 2023-08-29]                                                                            | (updated BOM, new timeline for Phase 3 and updated Project Team).<br><br>Dated 29 August 2023.                                                                                                                                                                                                                                                                                                                                                                                   |
| 5  | 2 <sup>nd</sup> Amendment of contract 2197<br>Signed on 18 January 2024<br>ADAM: 24SYMV014150606 2024-01-19   | 2 <sup>nd</sup> modification of contract of subproject 1<br>Signed on 18 January 2024<br>(Change of the basic data centre from “Microsoft Region – North Europe” to “Microsoft Region - West Europe” & approval of usage of the data centre “Microsoft Region Sweden” for the provision of certain services).<br><br>Dated 19 January 2024.                                                                                                                                      |
| 6  | 3 <sup>rd</sup> Amendment of contract 2197<br>Signed on 15 April 2024<br>ADAM:24SYMV014602252 2024-04-16      | 3 <sup>rd</sup> modification of contract of subproject 1<br>Signed on 15 April 2024<br>(inclusion of new subcontractor for Phase 6 and updated Project Team).<br><br>Dated 16 April 2024.                                                                                                                                                                                                                                                                                        |
| 7  | 4 <sup>th</sup> Amendment of contract 2197<br>Signed on 11 September 2024<br>ADAM: 24SYMV015412029 2024-09-12 | 4 <sup>th</sup> modification of contract of subproject 1<br>Signed on 11 September 2024<br>(approval of usage of the data centre “Microsoft Region – West Germany Central” for the provision of certain services).<br><br>Dated 12 September 2024.                                                                                                                                                                                                                               |
| 8  | 5 <sup>th</sup> Amendment of contract 2197<br>Signed on 1 November 2024<br>ADAM:24SYMV015731676 2024-11-07    | 5 <sup>th</sup> modification of contract of subproject 1<br>signed on 1 November 2024<br>(update of the “mechanism for the calculation of reference cost” of Annexes 5 & 6, modification of Article 10 clarifying procurement details for services that are not included in the aforementioned “mechanism”, approval of usage of the data centre “Microsoft Region – West Germany Central” for some additional services and updated Project Team).<br><br>Dated 7 November 2024. |
| 9  | Option Activation Contract<br>Signed on 28 November 2024<br>ADAM: 24SYMV015864278 2024-11-28                  | Option Activation Contract “Supply of High-Speed Interface for IDIKA S.A.” will support the secure and efficient data exchange between IDIKA’s systems and external entities.<br><br>Dated 28 November 2024.                                                                                                                                                                                                                                                                     |
| 10 | Project Contract (2197) Phase 2<br>Deliverable П3: “Installed Equipment”                                      | Report on the equipment installed.<br><br>Dated 19 October 2023.                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 11 | Project Contract (2197) Phase 2<br>Deliverable П4: “Operational tests report”                                 | Report on the operational tests for the nodes.<br><br>Dated 19 October 2023.                                                                                                                                                                                                                                                                                                                                                                                                     |

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| 12 | Project Contract (2197) Phase 2 Deliverable Π6: “Azure Landing Zones”                                                                                                                                                                                                                 | Report on the Azure Landing Zones.<br><br>Dated 17 November 2023.                                                                                                                                                                                                                                  |
| 13 | Acceptance Committee’s Protocol of qualitative and quantitative acceptance of Phase 2 and deliverables Π3, Π4 & Π6.                                                                                                                                                                   | Acceptance Committee’s Protocol of qualitative and quantitative acceptance of Phase 2 which concerns the Supply, Installation, Configuration and commissioning of the Hyper Converged local infrastructure with extension to cloud computing services.<br><br>Dated 4 December 2023.               |
| 14 | Contracting Authority’s (Information Society SA) Decision for the acceptance of the Completion and Acceptance of Phase 2 Deliverables and Contractual Payment and the Acceptance Committee’s Protocol no 4/ 4 December 2023 (protocol number: 26916/15-12-2023- ADA: 68PZ469H4Σ-ΔΛΨ). | Contracting Authority’s (Information Society SA) Phase 2: “Installation of the Hybrid Cloud Infrastructure (HCI) and development of the ‘Landing Zones’ in the Public Cloud domain”, Decision of Completion and Acceptance of Deliverables and Contractual Payment.<br><br>Dated 15 December 2023. |
| 15 | Deliverable of 32 implemented microprojects                                                                                                                                                                                                                                           | Informative Completion Report of Small-Scale Projects by the Contractor: A list of 32 implemented microprojects submitted to the Information Society for acceptance.<br><br>Dated 19 June 2024.                                                                                                    |
| 16 | Acceptance Committee’s Protocol qualitative and quantitative acceptance of Phase 6.                                                                                                                                                                                                   | Acceptance Committee’s Protocol of qualitative and quantitative acceptance of 32 Cloud based applications within Project Phase 6: Development and Migration of applications to the Cloud environment.<br><br>Dated 9 August 2024.                                                                  |
| 17 | Contracting Authority’s (Information Society SA) approval of Completion of 32 assignments and Contractual Payment and the Acceptance Committee’s Protocol.<br>Dated 9 August 2024 (protocol number: 20915/13-09-2024- ADA: 9T3Θ469H4Σ-ΛΚΦ).                                           | Contracting Authority’s (Information Society SA) Approval of Completion of 32 Cloud based applications within Project Phase 6: Development and Migration of applications to the Cloud environment.<br><br>Dated 13 September 2024.                                                                 |
| 18 | Deliverable 51 implemented microprojects                                                                                                                                                                                                                                              | Informative Completion Report of Small-Scale Projects by the Contractor: A list of 51 implemented microprojects submitted to the Information Society for acceptance.<br><br>Dated 19 December 2024.                                                                                                |
| 19 | Acceptance Committee’s Protocol no 12 of qualitative and quantitative acceptance of 51 assignments. Dated                                                                                                                                                                             | Acceptance Committee’s Protocol of qualitative and quantitative acceptance of 51 Cloud based applications within Project Phase 6:                                                                                                                                                                  |

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|    |                                                                                                                                                                                                                               | Development and Migration of applications to the Cloud environment.<br><br>Dated 7 January 2025.                                                                                                                                |
| 20 | Contracting Authority's (Information Society SA) Approval of Completion of 51 assignments and Contractual Payment.<br>(protocol number: 1545/28-01-2025-ADA: 919A469H4Σ-ΠΩ9).                                                 | Contracting Authority's (Information Society SA) Approval of Completion of 51 Cloud based applications within Project Phase 6: Development and Migration of applications to the Cloud environment<br><br>Dated 28 January 2025. |
| 21 | Option Activation Contract deliverable Π2β "Express Route Circuit in Full Operation"                                                                                                                                          | Option Activation Contract deliverable for the H_nodes high-speed interface<br><br>Dated 24 January 2025.                                                                                                                       |
| 22 | Acceptance Committee's Protocol no 3 of qualitative and quantitative acceptance of Phase 1 of Subproject 2<br><br>Dated 28 January 2025.<br>(protocol number: 1542/28-01-2025).                                               | Acceptance Committee's Protocol of qualitative and quantitative acceptance of Phase 1 of Subproject 2<br><br>Dated 28 January 2025.                                                                                             |
| 23 | Contracting Authority's (Information Society SA) Decision of Completion and Acceptance of Option Activation Contract Phase 1 Deliverables<br>Dated 6 February 2025<br>(protocol number: 2424/06-02-2025-ADA: ΨH3P469H4Σ-0ΦΞ). | Contracting Authority's (Information Society SA) Phase 1: "Circuit Installation and Technical Proposal Update", Decision of Completion and Acceptance of Deliverables<br><br>Dated 6 February 2025.                             |
| 24 | Acceptance Committee's Protocol of qualitative and quantitative acceptance of Phase 5 and Contractual Payment<br><br>Dated 8 August 2024                                                                                      | Acceptance Committee's Protocol of qualitative and quantitative acceptance of Phase 5, which concerns the training plan and report on the completion of training services.<br><br>Dated 8 August 2024.                          |
| 25 | Contracting Authority's (Information Society SA) Decision of Completion and Acceptance of Phase 5 Deliverables and Contractual Payment<br><br>(protocol number: 20397/06-09-2024- ADA: 9ΠΙΨ469H4Σ-ΨΩ5).                       | Contracting Authority's (Information Society SA) Phase 5: "Delivery of educational services", Decision of Completion and Acceptance of Phase 5 Deliverables and Contractual Payment.<br><br>Dated 6 September 2024.             |
| 26 | Acceptance Committee's Protocol of qualitative and quantitative acceptance of Phase 4 (1 <sup>st</sup> part).<br><br>Dated 12 November 2024.                                                                                  | Acceptance Committee's Protocol of qualitative and quantitative acceptance of Phase 4, which concerns on site support services.<br><br>Dated 12 November 2024.                                                                  |
| 27 | Contracting Authority's (Information Society SA) Decision for the                                                                                                                                                             | Contracting Authority's (Information Society SA) Phase 4: "Delivery of on-premise support                                                                                                                                       |

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|    | Acceptance of 1 <sup>st</sup> part of Phase 4 support services and Contractual Payment<br><br>(protocol number: 28175/11-12-2024- ADA: 9ΑΠΔ469Η4Σ-ΦΕΠ).                                                                                      | services”, Decision of Acceptance of the 1 <sup>st</sup> part of support services and Contractual Payment.<br><br>Dated 11 December 2024.                                                                                                              |
| 28 | Contracting Authority’s (Information Society SA) approval for including the Data Centre Microsoft Region – West Germany Central to the Cloud infrastructure<br>Dated 22 May 2024.<br>(protocol number 11808/22-05-2024 - ADA:6ΑΠΝ469Η4Σ-ΡΟΔ) | Contracting Authority’s (Information Society SA) approval for including the Data Centre Microsoft Region – West Germany Central to the Cloud infrastructure.<br><br>Dated 22 May 2024.                                                                 |
| 29 | Monitoring Committee’s Minutes of Meeting for proposing the inclusion of the Data Centre Microsoft Region – West Germany Central to the Cloud infrastructure.                                                                                | Monitoring Committee’s Minutes of Meeting no 6 for proposing the inclusion of the Data Centre Microsoft Region – West Germany Central to the Cloud infrastructure.<br><br>Dated 1 May 2024.                                                            |
| 30 | Link of the Joint Research Center (JRC) webpage :<br><br><a href="https://e3p.jrc.ec.europa.eu/en/groups/data-centres-code-conduct/participants">https://e3p.jrc.ec.europa.eu/en/groups/data-centres-code-conduct/participants</a>           | Link of the Joint Research Center (JRC) webpage presenting the public listing of the organisations—data centre operators and owners—that participate in the European Commission’s voluntary <b>EU Code of Conduct on Data Centre Energy Efficiency</b> |
| 31 | Letter from the JRC confirming acceptance of West Germany Central datacentre to the JRC webpage                                                                                                                                              | Letter from the Joint Research Center (JRC), granting the West Germany Central datacentre (consisting of six individual datacentres in Frankfurt) the title of participant.<br><br>Dated 24 August 2025                                                |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

#### **Beginning of operations of the set-up of all project components and parametrize infrastructure for the central cloud computing infrastructure and services project.**

Greece provided evidence that the requirement has been fulfilled through the development and successful operation of cloud infrastructure for both General Secretariat of Information Systems and Digital Governance (hereinafter referred to as “GSISPA”) and e-Government Centre for Social Security Services (hereinafter referred to as “IDIKA SA”).

In the Project Contract (hereinafter referred to as “contract”) (evidence 3) for Subproject 1 of the Action “Provision of Cloud Computing Infrastructure and Services”, signed on 20 June 2023, it’s explained that the foundational architecture necessary for the cloud computing infrastructure are referred to as “Landing Zones”. These Landing Zones provide “the main building blocks with which the Cloud environment is preparing to host work forms. Through the landing zones it is possible to migrate, modernise and innovate applications on an operational scale in Azure.” (evidence 3, page 120).

On page 242 of the contract (evidence 3) it is further stated that the Landing Zones were created during “Phase 2: Cloud resources during Phase 2: Procurement, installation, configuration and full operationalisation of Hyper-Converged Local Infrastructure with cloud expansion.” The completion of Phase 2 and the beginning of operations is evidenced by the relevant Acceptance Protocol, issued on 4 December 2023, confirming the acceptance of Phase 2 which entails the deliverables P3 ‘Installed equipment and productive operation of the Hyper-Converged local infrastructure with cloud expansion’ (evidence 10), P4 ‘Report on the results of audits’ (evidence 11), and P6 ‘Creation of Landing Zone’ (evidence 12). In addition, Greece provided the Completion Decision, (evidence 14) issued on 15 December 2023, where, on page 5, the contracting authority (Information Society SA) acknowledges the completion of the abovementioned deliverables of phase 2.

Regarding parametrising, the contract (evidence 3) explains on page 72 that the following parameters shall be taken into account: security, political, operational model, DevOps methodologies, tests, continuous improvement of resources and infrastructure.

### **Introduce and operationalize the central cloud computing infrastructure and services project.**

The functionality of the infrastructure has been validated by the successful development of 83 applications within the cloud environment delivered by the project. These applications are administered by public authorities to support a wide range of public services. The 83 applications were provided in two batches of 32 and 51 applications.

The 32 applications are described in the ‘Deliverable of 32 implemented microprojects’ document (evidence 15). On page 2, it is stated that in the context of Phase 6 ‘Application Development and Transition Services’ the Contractor has completed, with the agreement of the bodies, 32 micro-projects during the period from 20 October 2023 to 19 June 2024. 22 of these concern the beneficiary body of the GSISPA, while the remaining 10 concern the body of IDIKA AS. Completion is evidenced by the Acceptance Protocol (evidence 16), issued on 9 August 2024, which acknowledges receipt of the deliverables concerning the 32 ‘micro-projects’ which were implemented in the framework of Phase 6. Greece also provided the Completion Decision, (evidence 17) issued on 13 September 2024, where the contracting authority (Information Society SA) acknowledges the completion of 32 Cloud based applications under Phase 6. The 51 applications are described in the ‘Deliverable 51 implemented microprojects’ document (evidence 18). On page 2, it is stated that in the context of “Phase 6 ‘Application Development and Transition Services’, the Contractor has completed 51 micro-projects with the agreement of the bodies. 46 of these concern the beneficiary body of the GSISPA, while the remaining 5 concern the body of IDIKA SA.” Completion is evidenced by the Acceptance Protocol (evidence 19), issued on 7 January 2025, which acknowledges receipt of the deliverables concerning the 51 ‘micro-projects’ which were implemented in the framework of Phase 6. Greece also provided the Completion Decision, (evidence 20) issued on 28 January 2025, where the contracting authority (Information Society SA) acknowledges the completion of 51 Cloud based applications under Phase 6.

The applications that serve to make the cloud computing infrastructure operational, constitute evidence that the cloud computing infrastructure is introduced and operationalised.

### **The new installed infrastructure shall include virtual machines and corresponding virtual networks (infrastructure as a service), platform as a service,**

Page 56 of the contract (evidence 3) explains that the Azure Virtual Network (hereinafter referred to as “VNet”) is the fundamental building block for the private network in Azure, allowing Virtual Azure Machines (hereinafter referred to as “VM”) to communicate securely with each other, the internet and the internal networks. Page 57 explains that the VM is one of the different types of on-demand computing resources offered by Azure.

In relation to infrastructure as service, page 55 of the contract (evidence 3), explains that Infrastructure as a Service (hereinafter referred to as “IaaS”) is the platform that is part of Microsoft Azure

(Microsoft's public Cloud platform). Page 65 of the contract (evidence 3) explains that the Azure SQL database is a Platform as a Service database (hereinafter referred to as "Paas") engine that handles most of the database management functions, such as upgrading, code update, backup and monitoring without user involvement.

This functionality of Microsoft Azure, and the elements mentioned above, has also been validated by the successful development of 83 applications within the cloud environment delivered by the project. The evidence for the 83 applications is referred to above (evidence 15 -20).

### **two edge computing arrays, two special interfaces of high speed optical fibre**

#### *Two edge computing arrays*

Page 179 of the first amendment of the contract (evidence 4) refers to the installation and management of "Dell EMC PowerEdge servers". Page 124 states that the "infrastructure to be installed consists of two (2) hyper-converged nodes of Dell Technologies."

This is in line with the equipment listed in Deliverable P3 'installed equipment' (evidence 10) for "Phase 2: Procurement, installation, configuration and commissioning Hyper-Converged Local Infrastructure with Cloud Expansion". Pages 4 to 9 list the components of the two edge computing arrays to IDIKA SA, which includes Dell EMC AX-650 nodes. Completion of the computing arrays is evidenced by the Acceptance Protocol (evidence 13) issued on 4 December 2023, as well as the relevant Completion Decision (evidence 14) by Information Society SA, issued on 15 December 2023, which acknowledges receipt of the deliverables P3 'Installed equipment and productive operation of the Hyper-Converged local infrastructure with cloud expansion'.

#### *High speed optical fibre*

The deliverable for the Express Route Circuit (deliverable Π2β "Express Route Circuit in Full Operation") demonstrates that two optical fibres were installed to provide connectivity (evidence 21). Specifically, page 13 of the deliverable states that the contractor installed the required optical fibre infrastructure in Athens, providing service through its optical distributor and enabling the termination of IDIKA's circuits at "Nyma" and "Koletti" points with two 10 Gb interfaces, thereby fulfilling the requirement set in Subproject 2 for fibre-based interconnection of the points of presence (evidence 9, page 48).

The optical fibres are evidenced as completed by the Acceptance Protocol (evidence 22) issued on 28 January 2025, as well as the Completion Decision of Phase 1 (evidence 232), issued on 6 February 2025 where Information Society SA acknowledges receipt of all deliverables, including 'Placing of the Express Route Circuit in Full Operation'.

### **and training and support services for the overall project.**

This requirement is fulfilled by delivering a training course during Phase 5 'Education Services' of the contract. The courses covered several topics for cloud computing and cloud administration.

Greece has provided the Acceptance Protocol (evidence 24), issued on 8 August 2025, as well as the Completion Decision (evidence 25), issued on 6 September 2025, where Information Society SA acknowledges receipt of deliverables P10 'Plan of Education' and P11 'Report on Completion of Education Services', which constitute all deliverables for Phase 5. This is in line with the contract (evidence 3), which details the "Education Services" to be provided on page 197. The list of topics to be included covers the overall project, and the two deliverables of 'Plan of Education' and 'Report on Completion of Education Services' are listed on page 243-244.

### **The Data Centres of the Cloud Services Provider shall be required to comply with the "European Code of Conduct on Data Centre Energy Efficiency".**

Furthermore, in line with the description of the measure, **the requirement is in alignment with Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, by supporting the green transition and**

**contributing to the achievement of the Union's 2030 climate targets set out in Article 2(11) amended by Article 10 of the EU Climate Law and complying with the objective of EU climate neutrality by 2050 and of the digital transition, thereby contributing to the upward economic and social convergence, restoring and promoting sustainable growth and the integration of the economies of the Union.**

Requirement 47 of the tender specification requires that the Public Cloud Provider shall be a member of the EU Data Centres Energy Efficiency Code of Conduct. In addition, the Commission services verified compliance with this requirement by checking whether the data centres of the Cloud Services Provider (Microsoft) comply with the European Code of Conduct on Data Centre Energy Efficiency through the website of the JRC (hereinafter referred to as "JRC") which lists the participants to the code of conduct. For one datacentre, compliance was confirmed with an acceptance letter from the JRC. In particular:

The Commission services accessed the link of the website of the JRC provided by the Greek authorities on 18 July 2025 (evidence 30) to verify whether the abovementioned data centres are registered participants of the EU Code of Conduct on Data Centre Energy Efficiency. This check was completed successfully, confirming that all but one of the data centres in the abovementioned regions are listed as compliant with the European Code of Conduct on Data Centre Energy Efficiency (evidence 30).

The project also involves use of Microsoft West Germany Central region (hereinafter referred to as "WGC") data centre. While this data centre is not listed in the JRC website, EL has provided a letter (evidence 31), confirming acceptance by the JRC of the datacentre as compliant with the European Code of Conduct on Energy Efficiency, as required by the measure description.

The primary data center supporting the developed cloud infrastructure is located in the Microsoft West Europe Region (Middenmeer). The Microsoft North Europe region (Dublin) serves as the disaster recovery site. Page 109 of the contract (evidence 3) refers to the Dublin data centre as for disaster recovery. The data centre in Sweden is referred to in the second amendment of the contract (evidence 5), page 15, regarding the "The provision of the Azure Open AI service to Microsoft's data centre in Sweden under this contract." Additionally, the Microsoft Sweden region (Gävle and Sandviken) will be used for specific services. The data centre in West Europe is referred to in the second amendment of the contract (evidence 7) on page 16. It is stated that the Data Centres where all the services requested are offered is the Netherlands (Microsoft Region – West Europe-Amsterdam).

Furthermore, in line with the description of the measure, **the project shall deliver a modern Hybrid Cloud Infrastructure consisting of two tenants: One for the G-Cloud and another one for the H-Cloud. Each tenant shall have the private cloud component and the public cloud component in a unified management and service delivery environment.**

Regarding G-Cloud and H-Cloud tenants, as stated in Article 2 of the contract (evidence 3), the subject of the contract is the operation of the IT systems hosted or to be hosted by the GSISPA or IDIKA AS in the context of the G-Cloud and H-Cloud government clouds.

The public component is fulfilled by Microsoft Azure, which is Microsoft's public cloud platform, as explained on page 55 of the contract (evidence 3). Delivery of Microsoft Azure is evidenced through the Completion Decision (evidence 14) of Phase 2 "Procurement, installation, configuration and full operationalisation of Hyper-Converged local infrastructure with cloud extension". On page 5 it acknowledges receipt of deliverables P3 "Installed equipment and productive operation of the Hyper-Converged local infrastructure with cloud expansion" (evidence 10), P4 "Report on the results of audits" (evidence 11) and P6 'Creation of Landing Zone' (evidence 12), which constitute the deliverables for Phase 2.

The private component is fulfilled by Azure VMware Solution. Page 60 of the contract (evidence 3) explains that Azure VMware Solution provides private clouds containing VMware vSphere complex in Azure.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Target:** 148 Interactive systems installation completion

**Related Measure:** 3,2.16676 Digital transformation of Education

**Quantitative Indicator:** Number of interactive learning systems installed

**Baseline:** 0

**Target:** 36000

**Time:** Q2 2024

### 1. Context:

The investment foresees the digital transformation of education in terms of content, infrastructure and services, and is accompanied by a comprehensive reform strategy to update curricula, rationalise services and monitor educational outcomes. The investment consists of the following components: Digital content in schools; digital equipment in schools; professional development of the teachers in schools and digital services in schools and universities.

Target 148 requires installation of at least 36 000 interactive learning systems for classrooms of primary and secondary schools.

Target 148 is the first step of the implementation of the investment. It will be followed by milestone 148a and milestone 148b, related to the development of comprehensive reform strategy to update curricula, rationalise services, monitor educational outcomes and the completion of other projects to contribute to the digital transformation of education. The investment has a final expected date for implementation in Q4/2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                  |
|---|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                    |
| 2 | 148_16676_I_RFP                                                                                                                | International Open Tender issued by Ministry of Education, Religious Affairs & Sports on 26 July 2022 for the supply of interactive systems to school units throughout the country (3 Lots). AΔAM: 22PROC011004582 |
| 3 | 148_16676_I_RFP_Annex VIII                                                                                                     | Annex VIII to the Tender Specifications issued by Ministry of Education, Religious Affairs & Sports on 26 July 2022 (list of beneficiary schools), as integral part of the RFP document and Contracts.             |
| 4 | 148_16676_I_Contract_Lot1                                                                                                      | Contract signed for the Lot 1, between the Ministry of Education, Religious Affairs & Sports and the company VODAFONE-PANAFON AEET on 28 February 2023, AΔAM: 23SYMV012231182                                      |

|    |                           |                                                                                                                                                                                                   |
|----|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5  | 148_16676_I_DOC1_CONT     | Declaration of completion Lot 1 – Contractor, the company VODAFONE-PANAFON AEET on 31 December 2024                                                                                               |
| 6  | 148_16676_I_Minutes_LOT 1 | Minutes of the Committee for Monitoring and Acceptance of Deliverables, the Ministry of Education and Sport, Number: 10/Υπ.1 Διαδραστικά of 07 February 2025                                      |
| 7  | 148_16676_I_FA1_AUTH      | Final acceptance ministerial decision for Lot 1 of the Committee for Monitoring and Acceptance of Deliverables, the Ministry of Education and Sport on 11 February 2025                           |
| 8  | 148_16676_I_Contract_Lot2 | Contract signed for the Lot 2, between the Ministry of Education, Religious Affairs & Sports and the association of companies ‘COSMOTE-BYTE ABEE’ on 24 February 2023<br>ΑΔΑΜ:<br>23SYMV012211627 |
| 9  | 148_16676_I_DOC2_CONT     | Declaration of completion Lot 2 – Contractor, the association of companies ‘COSMOTE-BYTE ABEE’, on 31 December 2024                                                                               |
| 10 | 148_16676_I_Minutes_LOT 2 | Minutes of the Committee for Monitoring and Acceptance of Deliverables, the Ministry of Education and Sport Number: 10/Υπ.3 Διαδραστικά of 20 February 2025                                       |
| 11 | 148_16676_I_FA2_AUTH      | Final acceptance ministerial decision for Lot 2 of the Committee for Monitoring and Acceptance of Deliverables, the Ministry of Education and Sport on 25 February 2025                           |
| 12 | 148_16676_I_Contract_Lot3 | Contract signed for the Lot 3, between the Ministry of Education, Religious Affairs & Sports and the association of companies “NOVA-AKTIB” on 1 March 2023, ΑΔΑΜ:<br>23SYMV012239160              |
| 13 | 148_16676_I_DOC3_CONT     | Declaration of completion Lot 3 – Contractor, the association of companies “NOVA-AKTIB” of 26 February 2025                                                                                       |
| 14 | 148_16676_I_Minutes_LOT 3 | Minutes of the Committee for Monitoring and Acceptance of Deliverables, the Ministry of Education and Sport Number: 10/Υπ.4 Διαδραστικά of 19 March 2025                                          |
| 15 | 148_16676_I_FA3_AUTH      | Final acceptance ministerial decision for Lot 1 of the Committee for Monitoring and Acceptance of Deliverables, the Ministry of Education and Sport on 31 Marh 2025                               |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target.

**Installation of at least 36 000 interactive learning systems for classrooms of primary and secondary schools.** Furthermore, in line with the description of the measure, **the investment consists of the following components: (...); digital equipment in schools.**

The Ministry of Education and Religious Affairs, acting as the Contracting Authority, has launched an open public tender under Request for Proposals No ΑΔΑΜ 22PROC011004582 (evidence 2). The tender specifications for the call for tenders include 3 lots (ESIDIS serial no. lot 1: 169475, Lot 2: 169490, Lot 3: 169492) and indicates on page 110 that “the distribution of the interactive learning systems (36 264 items) procured into the 3 lots, along with the address and contact information of the delivery points is outlined in the attached Excel file (i.e. evidence 3 - 148\_16676\_I\_RFP\_Annex VIII, which constitutes an integral part of this document)”. Based on the mentioned annex, the tender specifications include the supply and installation of 12 235 interactive systems for Lot 1, 12 055 for Lot 2 and 11 974 for Lot 3, i.e. a total of 36 264.

Article 1 of each contract signed, corresponding to Lot 1 (evidence 4 -148\_16676\_I\_Contract\_Lot1), 2 (evidence 8 - 148\_16676\_I\_Contract\_Lot2) and 3 (evidence 12 - 148\_16676\_I\_Contract\_Lot3), makes the tender specifications an integral part of the contract specifying that “the subject of the contract (...), is the supply and installation of interactive systems in the school units listed in Annex VIII of the Tender, which pertain to Section 1 of the competition.”

The delivery and installation of the equipment was carried out under the responsibility of the Contractor, and for each lot a declaration of completion by each contractor has been submitted (evidence 5, 9, & 13). Equally, after carrying out the required inspections the delivery and installation of the equipment was confirmed for each lot by a Committee for Monitoring and Acceptance of Deliverables, as an executive structure of the Ministry of Education, Religious Affairs & Sports, as per the corresponding minutes (evidence 6, 10 & 14).

Moreover, in accordance with Article 208 of Law 4412/2016, the Ministry of Education, Religious Affairs & Sports adopted the decisions of the three Committees for Monitoring and Acceptance of Deliverables, corresponding to each lot, as follows:

- Adoption of Decision No 10/Υπ. 1 Διαδραστικά/07 February 2025 (evidence 7), confirming on page 3, paragraph C, the acceptance of all the deliverables, i.e. that 12 235 interactive learning system items have been delivered and installed as per the corresponding contract.
- Adoption of Decision No 10/Υπ. 3 Διαδραστικά/20 February 2025 (evidence 11), confirming on page 4, paragraph E, the acceptance of all the deliverables, i.e. that 12 055 interactive learning system items have been delivered and installed as per the corresponding contract.
- Adoption of Decision No 11/Υπ. 4 Διαδραστικά/19-3-2025 (evidence 15), confirming on page 3, paragraph E, the acceptance of all the deliverables, i.e. that 11 974 interactive learning system items have been delivered and installed as per the corresponding contract.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Target:** 155 Clawback decrease 150 000 000 - step 2

**Related Measure:** 3,3.16816 Reforms and acceleration of investments in the Healthcare Sector - Clawback reduction and rationalization of healthcare expenditure

**Quantitative Indicator:** Decrease in the amount of clawback compared with the 2020 levels (EUR million)

**Baseline:** 0

**Target:** 150

**Time:** Q2 2024

### 1. Context:

The reform of the clawback system shall introduce risk-sharing in the calculation of the clawback by setting a binding target of clawback reduction over the next years, a minimum reduction of clawback amounts by EUR 50 000 000 (2022), EUR 150 000 000 (2023), EUR 300 000 000 (2024) and EUR 400 000 000 (2025) respectively, from the 2020 levels, to be achieved through the full enforcement of previously adopted and new efficiency enhancing measures and fully in line with EU State aid rules.

Target 155 requires a reduction of the 2023 pharmaceutical clawback for outpatient and inpatient pharmaceuticals by EUR 150 000 000 compared with the 2020 levels. To the extent that this is not achieved, the difference between the targeted reduction and the actual reduction for each year shall not be clawed back from the pharmaceutical industry and the relevant amount shall be borne by the state budget up to EUR 150 000 000.

Target 155 is the third target of the reform. It follows the completion of milestone 153 and target 154 related to the entry into force of a primary law for clawback reduction and the achievement of a reduction of the 2022 pharmaceutical clawback, respectively. It is accompanied by target 156 in this payment request, which relates to carrying out investments in pharmaceuticals R&D. It will be followed by target 156a related to the completion of total investments in pharmaceuticals R&D, and targets 157 and 158, related to the reduction of the pharmaceutical clawback in 2024 and in 2025 compared to the 2020 levels, respectively. The reform has a final expected date for implementation on 30 June 2026.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                                                                      |
|---|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                                                                        |
| 2 | Report by the Ministry of Health on structural measures and on documentation of achievement of target                          | The report dated 11 July 2025 is signed by the Secretary-General for Strategic Planning of the Ministry of Health. It describes the new structural measures taken to reduce the total clawback amount in 2023 compared to 2020 and it states the actual amount of clawback in the years 2023 and 2020. |
| 3 | Validation report by the Minister of Health of the above report                                                                | The document dated 11 July 2025 is signed by the Minister of Health and validates the                                                                                                                                                                                                                  |

|   |                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                                                                          | Report of 11 July 2025 of the Secretary-General for Strategic Planning on structural measures and on achievement of the target.                                                                                                                                                                                                                                                                                                |
| 4 | List of agreements signed in the year 2023 and in force for the same year for the Hospitals (Public National Health Service & Papageorgiou) and the National Organization for the Provision of Health Care Services (hereinafter referred to as "EOPYY") | The list includes the agreements that were signed by the Drug Price Negotiation Committee in the year 2023 and in force for the same year for EOPYY, the hospitals of the National Health Service and the Papageorgiou General Hospital.                                                                                                                                                                                       |
| 5 | Report on the agreed closed budgets for the Year 2023                                                                                                                                                                                                    | The document reports the evolution of total amount of closed budgets agreed from the Drug Price Negotiation Committee per year from 2020 onwards and the distribution of closed budgets between EOPYY and Hospitals.                                                                                                                                                                                                           |
| 6 | Financial Report no. οικ.3335/21.03.2025 issued by the National Centralized Health Procurement Authority (hereinafter referred to as "EKAPY") of the Ministry of Health on the amount of Pharmaceutical Expenditure and clawback                         | The report is dated 21 March 2025 and issued by the Directorate of Pharmaceutical, Material, and Services Management of the EKAPY of the Ministry of Health. It states the total amount of Pharmaceutical Expenditure of the Hospitals of the National Health System and the General Hospital of Papageorgiou for the year 2023 and the total amount of clawback for the same year related to this category of expenditure.    |
| 7 | Certificate issued by the Directorate of Pharmaceuticals and the Directorate of Finance of the EOPYY on the amount of Pharmaceutical Expenditure and clawback                                                                                            | The certificate is dated 19 September 2024 and constitutes EOPYY's grant request due to the increased pharmaceutical expenditure ceiling for the year 2023 and it states the total amount of Pharmaceutical Expenditure and clawback for EOPYY for the year 2023.                                                                                                                                                              |
| 8 | Informative Note issued by the Directorate of Pharmaceutical, Material, and Services Management of the EKAPY                                                                                                                                             | The note is dated 10 July 2025 and issued by EKAPY. It includes a list of the imposed automatic clawback amount per pharmaceutical company for the year 2023 for Hospitals expenditure.                                                                                                                                                                                                                                        |
| 9 | Joint Ministerial Decision No. G.P. 24743/2023 of the Ministers of Finance, Health, Government Gazette B – 2915-03/05/2023                                                                                                                               | Joint Ministerial Decision adjusting the amount of pharmaceuticals clawback borne by the state to add any difference between the actual and the planned reduction in 2023. This Decision distributes the allowed increase of pharmaceutical expenditure for the years 2022 and 2023 between annual pharmaceutical expenditure of the EOPYY, the hospital pharmaceutical expenditure of the pharmacies of the EOPYY, as well as |

|    |                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----|------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                          | the hospital pharmaceutical expenditure of the hospitals of the National Health Service and the General Hospital of Papageorgiou.                                                                                                                                                                                                                                                                                                                           |
| 10 | Joint Ministerial Decision with No. B1/ouk. 66746-24/12/2024 of the Ministers of Finance, Health, Government Gazette B – 7648-31/12/2024 | Joint Ministerial Decision describing the method of calculating the Clawback for the year 2023 for Hospitals.                                                                                                                                                                                                                                                                                                                                               |
| 11 | Law 4549/2018, Government Gazette A 105/14.6.2018, Article 25, paragraph 3, as amended and in force                                      | Arrangements for the clawback mechanism used to control public pharmaceutical and healthcare spending in Greece.                                                                                                                                                                                                                                                                                                                                            |
| 12 | Law 4837/2021, Government Gazette A 178/01.10.2021, Article 77                                                                           | Extension of the application of the automatic clawback mechanism for pharmaceutical expenditure and expenditure of health services - Reduction of clawback and rationalization of pharmaceutical expenditure - Amendment of article 25 of Law 4549/2018.<br>The law states the increase in the annual total limits of pharmaceutical expenditure by an amount of EUR 150 000 000 in case of increase in the amount of clawback compared to the 2020 levels. |
| 13 | Law 5034/2023, Government Gazette A 69/18.03.2023, article 126                                                                           | Implementation of the automatic refund mechanism - Amendment of article 25, paragraph 4 of Law 4549/2018.<br>The law states the amount that shall be borne by the State Budget in case of increase in the amount of clawback compared to the year 2020 levels.                                                                                                                                                                                              |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target.

**Enforce previously adopted efficiency enhancing measures to achieve a reduction of the 2023 pharmaceutical clawback, both for outpatient and inpatient pharmaceuticals, by EUR 150 000 000 compared with the 2020 levels, supporting the resilience of the health care system.**

Greece has provided a report from the Secretary-General for Strategic Planning of the Ministry of Health (evidence 2) and validated by the Minister of Health (evidence 3), to support the enforcement of several administrative and legislative measures both for outpatient and inpatient pharmaceuticals aimed at rationalising pharmaceutical expenditure. These measures focused on negotiations on drug price discounts and implementation of drug consumption controls. They included:

1. The signature in 2023 of 240 agreements (and in force for the same year) by the Drug Price Negotiation Committee (DPNC), that was set up by Law 4512/2018 (article 254) and which resulted in significant drug price discounts (also confirmed with evidence 4).

2. The implementation of closed budgets in categories of products with high budget impact (distributed through the EOPYY (National Organization for the Provision of HealthCare Services) and Hospital channels) with the aim of rationalizing the pharmaceutical expenditure at the level of either specific medicinal products, specific active ingredients, or specific therapeutic categories. The distribution of the amounts of closed budgets between the EOPYY and Hospitals is 72.2% and 27.8%, respectively (also confirmed with evidence 5).
3. The application of strict criteria for the distribution of medicines of low therapeutic value such as vitamins, magnesium, and iron, setting closed budgets for Vitamin D, calcium, magnesium and iron to EUR 40 million per year.
4. The establishment of a clawback cap on very cheap hospital drugs to avoid substitution by more expensive drugs.
5. The funding and control of all Hospital Medicine by the EKAPY, which in 2023 has signed contracts with an awarded value of more than EUR 150 million.

The measures concern **both inpatient and outpatient pharmaceuticals**, considering that the DPNC is responsible for negotiating the prices of medicines that are reimbursed by EOPYY or purchased by public hospitals, which indicates that it addresses both inpatient (hospital drugs) and outpatient (EOPYY and private pharmacies) pharmaceuticals. Additionally, the agreements and closed budgets that are put in place concern both high-cost drugs distributed through EOPYY pharmacies and retail/private pharmacies, as well as hospital drugs.

Despite implementing these measures, the planned reduction of EUR 150 million has not been achieved.

**To the extent that this is not achieved, the difference between the targeted reduction and the actual reduction for each year shall not be clawed back from the pharmaceutical industry and the relevant amount shall be borne by the state budget up to EUR 150 000 000.**

The report from the Secretary-General for Strategic Planning of the Ministry of Health (evidence 2), validated by the Minister of Health (evidence 3), contains the amount of clawback for the years 2023 and 2020. According to the evidence, the clawback on pharmaceutical spending of hospitals amounted to EUR 537 088 403.41 in 2023 (as also reported in evidence 6 and 8) compared to EUR 360 000 000.00 in 2020, which corresponds to an increase of EUR 177 088 403.41. The Joint Ministerial Decision No. B1/οικ. 66746-24/12/2024 by the Ministers of Finance and Health, published in Government Gazette B – 7648-31/12/2024 (evidence 10) describes the method of calculating the clawback for the year 2023 for Hospitals. At the same time, the clawback on pharmaceutical spending of the EOPYY amounted to EUR 929 494 180.00 in 2023 (as also reported in evidence 7) compared to EUR 885 980 016.00 in 2020, which corresponds to an increase of EUR 43 514 164.00. Taken together, these result in an increase of the pharmaceutical clawback both for outpatient and inpatient pharmaceuticals by EUR 220 602 567.41 compared with the 2020 levels, i.e. not achieving the reduction of EUR 150 000 000 as required by the target.

Given that the planned reduction has not been achieved, and that in 2023 there has been an increase in the total amount of clawback compared to the year 2020, Greece has provided evidence that the amount of EUR 150 000 000 is not being clawed back from the pharmaceutical industry and that it is covered by the state budget. This decision is based on article 25 of Law 4549/2018 (evidence 11) as amended by article 77 of Law 4837/2021 (evidence 12) and article 126 of Law 5034/2023 (evidence 13).

More precisely, article 77 of Law 4837/2021 amends article 25 of Law 4549/2018 by adding paragraph 3.b. which states that in the event that the total amount of the automatic clawback of the pharmaceutical expenditure, the hospital pharmaceutical expenditure of the pharmacies of EOPYY, as

well as the hospital pharmaceutical expenditure of the hospitals of the National Health Service and the General Hospital of Papageorgiou for the year 2023 shows, based on the accounting data, an increase in relation to the total amount of the automatic reimbursement (clawback) of the corresponding expenditure for the year 2020, the annual total limits of pharmaceutical expenditure and hospital pharmaceutical expenditure of the pharmacies of EOPYY, the hospitals of the National Health Service and the General Hospital of Papageorgiou of paragraph 1 and 2 of of Law 4549/2018 for the year 2023 are increased by the amount of EUR 150 000 000.00.

Furthermore, Article 126 of Law 5034/2023 amends paragraph 4 of article 25 of Law 4549/2018 stating that any expenditure incurred by the application of the above paragraph 3 will be borne by the State Budget. The amount and distribution of the annual increase in the limits between the above categories of pharmaceutical expenditure shall be determined annually by a joint decision of the Ministers of Finance and Health.

In accordance with the provisions of Law 5034/2023, the Joint Ministerial Decision No. G.P. 24743/2023 of the Ministers of Finance and Health was published in the Government Gazette B – 2915-03/05/2023 (evidence 9). The decision states that the amount and distribution of the annual increase in the limits between the above categories of pharmaceutical expenditure for the year 2023 is increased by EUR 150 000 000.00 and is distributed in the following way:

- An amount of EUR 65 000 000.00 for pharmaceutical expenditure (community pharmacies) of EOPYY
- An amount of EUR 55 000 000.00 for pharmaceutical expenditure (high-cost medicines) of the EOPYY pharmacies.
- An amount of EUR 30 000 000.00 for hospital pharmaceutical expenditure of the hospitals of the National Health Service.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Target:** 156 R&D pharmaceutical investment proof - step 1

**Related Measure:** 3,3.16816 Reforms and acceleration of investments in the Healthcare Sector - Clawback reduction and rationalization of healthcare expenditure

**Quantitative Indicator:** Investment (in EUR million), applied through offsets of an equivalent amount with the clawbacks

**Baseline:** 0

**Target:** 117

**Time:** Q2 2024

### 1. Context:

The reform of the clawback system shall introduce risk-sharing in the calculation of the clawback by setting a binding target of clawback reduction over the next years. In addition, the measure foresees the financing of clinical trial, R&D or other investment expenditure by liable companies, through a partial offset of their clawback liabilities for the years 2021 and beyond.

Target 156 requires the carrying out of investments in pharmaceuticals R&D for an amount of EUR 117 000 000.

Target 156 is the fourth target of the reform, accompanied by Target 155 in the same payment request, which concerns reduction of clawback for year 2023. Target 156 follows the completion of milestone 153 and target 154. It will be followed by target 156a, when additional investments will be confirmed through clawback offsetting certificates in order to reach the total amount of EUR 250 000 000, as well as Target 157 and Target 158, related to reduction of the pharmaceutical clawback for years 2024 and 2025 respectively. The reform has a final expected date for implementation on 30 June 2026.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2 | Call for Proposals<br>ADA: ΩNKΣ46MTAP-9ΛB<br>Protocol Number:<br>14155-10.02.22                                                | The Call issued by GSRI on 10/02/2022 requested investments by businesses subject to the automatic clawback offset procedure entitled "Invitation to beneficiary enterprises for the offsetting of automatic pharmaceutical expenditure return pursuant to the provisions of G.P.ec. 80277/23.12.2021 (B' 6247) Joint Ministerial Decision / JMD within the framework of the Recovery and Resilience Fund for the Action "REFORM OF THE CLAWBACK SYSTEM & OFFSETTING WITH RESEARCH AND INVESTMENT EXPENDITURES" (OPS Code TA 5150266)" |
| 3 | 4th Amended Call for Proposals<br>ADA: Ψ2AA46NΛΣΞ-ZΞΘ<br>Protocol Number:<br>39169-21.05.25                                    | The 4th Amended Call issued by GSRI on 21/05/2025 extended the implementation period until 31/12/2025                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|    |                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4  | Approval Decision<br>ADA: ΨΣΟΕ46ΜΤΛΡ-ΠΩΠ<br>Protocol Number: 81682–22.08.2022                                                                                                                | The Approval Decision issued by GSRI on 22/08/2022 granted approval for 53 projects with a total public expenditure of 246.787.031,11 €                                                                                                                                                                                                                                                                                                                                                                        |
| 5  | Amended Approval Decision<br>ADA: ΡΟΞΝ46ΜΤΛΡ-70Λ<br>Protocol Number: 7607-26.01.23                                                                                                           | The Amended Approval Decision issued by GSRI on 26/01/2023 granted 54 projects with a total public expenditure of 246.988.902,81 €                                                                                                                                                                                                                                                                                                                                                                             |
| 6  | Joint Ministerial Decision between the Ministers of Health, Finance, and Development & Investments<br>Protocol Number: Γ.Π. οικ. 80277<br>Official Journal B' 6247/27.12.2021                | Joint Ministerial Decision regarding the procedure, terms, and conditions for offsetting automatic clawback returns with percentages of research and development (R&D) expenses and the expenses of investment projects for the development of products, services, or production lines.                                                                                                                                                                                                                        |
| 7  | Joint Ministerial Decision between the Ministers of Health, Finance, and Development & Investments<br>Protocol Number: Β1β, Β2β/οικ. 60162/21.11.2024<br>Official Journal B' 6443/22.11.2024 | Amendment of the Joint Ministerial Decision No. G.P. οικ. 80277/23-12-2021 (Official Journal B' 6247) of the Ministers of Health, Finance, and Development & Investments, regarding the procedure, terms, and conditions for offsetting automatic clawback returns with percentages of research and development (R&D) expenses and the expenses of investment projects for the development of products, services, or production lines.                                                                         |
| 8  | A list of companies approved                                                                                                                                                                 | The list of companies is presented as follows:<br>Column A: the Sequence Number<br>Column B: the Investment plan Title<br>Column C: the investment plan Code<br>Column D: the Summary description<br>Column E: the Start date of implementation<br>Column F: the Finish date of implementation<br>Column G: the Report issued by certified auditor<br>Column H: the Fenix filename of Clawback Certification<br>Column I: the Amount of Clawback Certification<br>Column J: the Rationale (type of investment) |
| 9  | Offset certificates for TACL1-0478259                                                                                                                                                        | Clawback offsetting certificate No 1, issued on 06 November 2023 and certificate No 2, issued on 29 November 2024 by the General Secretariat for Research and Innovation                                                                                                                                                                                                                                                                                                                                       |
| 10 | Offset certificates for TACL1-0478260                                                                                                                                                        | Clawback offsetting certificate No 1, issued on 26 October 2023 and certificate No 2, issued on 29 November 2024 by the General Secretariat for Research and Innovation                                                                                                                                                                                                                                                                                                                                        |
| 11 | Offset certificates for TACL1-0478355                                                                                                                                                        | Clawback offsetting certificate No 1, issued on 26 October 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation                                                                                                                                                                                                                                                                                                                                       |
| 12 | Offset certificates for TACL1-0478366                                                                                                                                                        | Clawback offsetting certificate No 1, issued on 06 November 2023, and certificate No 2, issued on 20 December 2024 by the General Secretariat for Research and Innovation                                                                                                                                                                                                                                                                                                                                      |

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| 13 | Offset certificates for TACL2-0480445 | Clawback offsetting certificate No 1, issued on 18 January 2024, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation  |
| 14 | Offset certificates for TACL1-0480470 | Clawback offsetting certificate No 1, issued on 27 October 2023, and certificate No 2, issued on 29 November 2024 by the General Secretariat for Research and Innovation  |
| 15 | Offset certificates for TACL2-0478367 | Clawback offsetting certificate No 1, issued on 10 January 2024, and certificate No 2, issued on 28 November 2024 by the General Secretariat for Research and Innovation  |
| 16 | Offset certificates for TACL2-0479325 | Clawback offsetting certificate No 1, issued on 27 October 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation  |
| 17 | Offset certificates for TACL2-0478267 | Clawback offsetting certificate No 1, issued on 27 October 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation  |
| 18 | Offset certificates for TACL1-0511603 | Clawback offsetting certificate No 1, issued on 25 April 2024, and certificate No 2, issued on 23 December 2024 by the General Secretariat for Research and Innovation    |
| 19 | Offset certificates for TACL1-0481528 | Clawback offsetting certificate No 1, issued on 04 January 2024, and certificate No 2, issued on 23 December 2024 by the General Secretariat for Research and Innovation  |
| 20 | Offset certificates for TACL1-500444  | Clawback offsetting certificate No 1, issued on 04 January 2024, and certificate No 2, issued on 27 November 2024 by the General Secretariat for Research and Innovation  |
| 21 | Offset certificates for TACL1-0480439 | Clawback offsetting certificate No 1, issued on 06 November 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation |
| 22 | Offset certificates for TACL2-0480440 | Clawback offsetting certificate, issued on 23 February 2024 by the General Secretariat for Research and Innovation                                                        |
| 23 | Offset certificates for TACL1-0509502 | Clawback offsetting certificate No 1, issued on 06 November 2023, and certificate No 2, issued on 10 December 2024 by the General Secretariat for Research and Innovation |
| 24 | Offset certificates for TACL1-0508597 | Clawback offsetting certificate, issued on 29 April 2024 by the General Secretariat for Research and Innovation                                                           |
| 25 | Offset certificates for TACL2-0512676 | Clawback offsetting certificate No 1, issued on 27 October 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation  |

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| 26 | Offset certificates for TACL1-0493283 | Clawback offsetting certificate No 1, issued on 27 October 2023, and certificate No 2, issued on 31 January 2025 by the General Secretariat for Research and Innovation  |
| 27 | Offset certificates for TACL1-0480686 | Clawback offsetting certificate, issued on 26 October 2023 by the General Secretariat for Research and Innovation                                                        |
| 28 | Offset certificates for TACL1-0479017 | Clawback offsetting certificate No 1, issued on 26 October 2023, and certificate No 2, issued on 03 December 2024 by the General Secretariat for Research and Innovation |
| 29 | Offset certificates for TACL1-0481529 | Clawback offsetting certificate No 1, issued on 04 January 2024, and certificate No 2, issued on 23 December 2024 by the General Secretariat for Research and Innovation |
| 30 | Offset certificates for TACL1-0497321 | Clawback offsetting certificate, issued on 11 December 2023 by the General Secretariat for Research and Innovation                                                       |
| 31 | Offset certificates for TACL2-0512573 | Clawback offsetting certificate, issued on 16 April 2024 by the General Secretariat for Research and Innovation                                                          |
| 32 | Offset certificates for TACL1-0500383 | Clawback offsetting certificate, issued on 11 December 2023, and certificate No 2, issued on 31 January 2025 by the General Secretariat for Research and Innovation      |
| 33 | Offset certificates for TACL1-0480687 | Clawback offsetting certificate No 1, issued on 26 October 2023, and certificate No 2, issued on 28 November 2024 by the General Secretariat for Research and Innovation |
| 34 | Offset certificates for TACL1-0480945 | Clawback offsetting certificate, issued on 11 December 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation     |
| 35 | Offset certificates for TACL1-0498641 | Clawback offsetting certificate, issued on 27 October 2023 by the General Secretariat for Research and Innovation                                                        |
| 36 | Offset certificates for TACL1-0511725 | Clawback offsetting certificate No 1, issued on 04 January 2024, and certificate No 2, issued on 10 December 2024 by the General Secretariat for Research and Innovation |
| 37 | Offset certificates for TACL1-0507948 | Clawback offsetting certificate, issued on 27 October 2023 by the General Secretariat for Research and Innovation                                                        |
| 38 | Offset certificates for TACL2-0511684 | Clawback offsetting certificate No 1, issued on 27 October 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation |
| 39 | Offset certificates for TACL1-0496261 | Clawback offsetting certificate No 1, issued on 01 November 2023, and certificate No 2, issued on 07 March 2025 by the General Secretariat for Research and Innovation   |

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| 40 | Offset certificates for TACL2-0480258 | Clawback offsetting certificate No 1, issued on 31 October 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation  |
| 41 | Offset certificates for TACL2-0499047 | Clawback offsetting certificate, issued on 31 January 2024 by the General Secretariat for Research and Innovation                                                         |
| 42 | Offset certificates for TACL1-0505153 | Clawback offsetting certificate, issued on 06 November 2023 by the General Secretariat for Research and Innovation                                                        |
| 43 | Offset certificates for TACL1-0479691 | Clawback offsetting certificate, issued on 27 May 2024 by the General Secretariat for Research and Innovation                                                             |
| 44 | Offset certificates for TACL1-0482277 | Clawback offsetting certificate No 1, issued on 26 October 2023, and certificate No 2, issued on 10 December 2024 by the General Secretariat for Research and Innovation  |
| 45 | Offset certificates for TACL1-0480763 | Clawback offsetting certificate No 1, issued on 06 November 2023, and certificate No 2, issued on 16 December 2024 by the General Secretariat for Research and Innovation |
| 46 | Offset certificates for TACL1-0508199 | Clawback offsetting certificate, issued on 11 June 2024 by the General Secretariat for Research and Innovation                                                            |
| 47 | Offset certificates for TACL1-0507516 | Clawback offsetting certificate, issued on 27 October 2023 by the General Secretariat for Research and Innovation                                                         |
| 48 | Offset certificates for TACL1-0491461 | Clawback offsetting certificate No 1, issued on 26 October 2023, and certificate No 2, issued on 25 November 2024 by the General Secretariat for Research and Innovation  |
| 49 | Offset certificates for TACL1-0481692 | Clawback offsetting certificate No 1, issued on 01 November 2023, and certificate No 2, issued on 07 February 2025 by the General Secretariat for Research and Innovation |
| 50 | Offset certificates for TACL1-0501402 | Clawback offsetting certificate, issued on 11 March 2024, and certificate No 2, issued on 07 February 2025 by the General Secretariat for Research and Innovation         |
| 51 | Offset certificates for TACL1-0480193 | Clawback offsetting certificate, issued on 11 March 2024, and certificate No 2, issued on 23 January 2025 by the General Secretariat for Research and Innovation          |
| 52 | Offset certificates for TACL1-0514439 | Clawback offsetting certificate, issued on 27 October 2023, and certificate No 2, issued on 23 December 2024 by the General Secretariat for Research and Innovation       |
| 53 | Offset certificates for TACL1-0481693 | Clawback offsetting certificate, issued on 04 January 2024, and certificate No 2, issued on 23 January 2025 by the General Secretariat for Research and Innovation        |

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| 54 | Offset certificates for TACL1-0508198 | Clawback offsetting certificate, issued on 06 November 2023 by the General Secretariat for Research and Innovation |
|----|---------------------------------------|--------------------------------------------------------------------------------------------------------------------|

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target.

#### **Carry out investments in pharmaceuticals R&D for an amount of EUR 117 000 000.**

Greece provided evidence that the General Secretariat of Research and Innovation (hereinafter referred to as: "GSRI") of the Ministry of Development and Investments launched a call for proposals for investment plans by companies on 10 February 2022, lastly amended on 21 May 2025 (evidence 2, 3).

Greece also provided the relevant Joint Ministerial Decision (hereinafter referred to as "JMD") specifying the eligible companies that can apply for offsetting certificates, as well as the eligible R&D and investment plans. The JMD was issued on 17 December 2021, amended by JMD issued on 22 November 2024 (evidence 6, 7). Specifically:

Article 1, paragraph 3 of the aforementioned JMD (evidence 6) defines the eligible companies, which are Marketing Authorization Holders of pharmaceutical products, pharmaceutical companies that are subject to clawback payments and companies operating under specific NACE codes that refer to activities linked to pharmaceuticals, biotechnology, medical devices, etc.

Article 2, paragraphs 1 and 2 determine the eligible research and development (R&D) categories, including industrial research, experimental development, feasibility studies, clinical trials, pilot batch production, and the use of digital technologies to enhance therapeutic compliance and data analysis. Article 2, paragraph 3 stipulates eligible investment projects, including new or upgraded production lines, research infrastructure, and equipment aimed at increasing pharmaceutical manufacturing capacity and quality.

**The investments shall be confirmed through the issuance by the Competent Authority of offsetting clawback certificates of an amount of EUR 117 000 000.** Furthermore, in line with the description of the measure, **the measure foresees the financing of clinical trial, R&D or other investment expenditure by liable companies, through a partial offset of their clawback liabilities for the years 2021 and beyond.**

Greece provided the approval decision (hereinafter referred to as "Approval Decision"), which was issued on 22 August 2022 by the Ministry of Development and Investments, lastly amended on 22 November 2024 (evidence 4, 5) that confirms the approval of 54 investments in R&D and other pharmaceutical investments (evidence 5, page 10-24). The Approval Decision has taken into account the eligibility requirements stipulated in the JMD (evidence 6).

Greece provided evidence that, out of the 54 investment schemes that were approved, 46 contribute to the achievement of Target 156, with offsetting clawback certificates of EUR 117 295 761,65 (evidence 9 to 54). These certificates are issued by the General Secretary of Research and Innovation under the Ministry of Development and Investments, which is the Competent Authority. The clawback offsetting

certificates detail the certified expenses for a specific project, reflecting the amounts eligible for offsetting within the framework of reform actions. They specify the certified total budget for the period, the exact public expenditure eligible for offsetting, and how these align with the conditions set forth by relevant ministerial decisions, enabling the offset of automatic clawback amounts with approved research and development or investment expenses.

Greece has also provided an excel list of the 46 investments, where, in column D, the content of the investment is described (evidence 8). Under the aforementioned evidence (evidence 8 to 54), Greece has also proven that all the offsetting expenses mentioned in these certificates are applicable for 2021 and beyond.

As the offset amount covered by these certificates accounts for a total of EUR 117 295 761,65, therefore exceeding the requirement of Target 156, the additional EUR 295 761 will be counted in Target 156a, which is the final cumulative target.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 167 Health Care digital transformation - National Digital Health Record (subproject 1)

**Related Measure:** 3,3.16752 Digital Transformation of Health (DigHealth)

**Qualitative Indicator:** Report testifying completion of all major elements of Subproject 1 (Digital Health Record - see Description)

**Time:** Q2 2024

### 1. Context:

The investment aims to optimise healthcare quality and patient safety with new innovative services, while at the same time help control healthcare spending by discouraging the overuse of products, pharmaceuticals, improve hospital management, patient experience, public procurement procedures and enhance system functionalities, interoperability and EOPYY's (National Organisation for the Provision of Healthcare Services) digital capacities. The investment covers the implementation of eight subprojects.

Milestone 167 requires the finalisation and putting into operation of at least all the following elements of Subproject 1 supporting the digital transformation of the health care system making the national digital health record operational: 1) clinical documents, 2) terminology services, 3) national e-health interoperability framework, 4) collecting all laboratory results into the e-health record, 5) collecting discharge letters).

Milestone 167 is the first step of the implementation of the investment. It will be followed by milestone 168 and milestone 173, related to the completion of all subprojects for the digital transformation of the healthcare system. The investment has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                                                  |
|---|--------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                                                    |
| 2 | Request for Proposals<br>ADAM:<br>23PROC012405365 2023-03-31                                                                   | Request for Proposals published on 30 March 2023 regarding the electronic open tender above the threshold for the award of a service contract titled: 'National Digital Health Record'                                                                                             |
| 3 | Contract<br>ADAM:<br>24SYMV014312545 2024-02-23                                                                                | Contract signed on 16 February 2024 between the E-GOVERNMENT CENTER for SOCIAL SECURITY Societe Anonyme (I.DI.K.A. S.A.) and the consortium of companies: Hellenic Telecommunications Organization S.A. (OTE) - BYTE Computer Industrial & Commercial Company S.A. (BYTE Computer) |
| 4 | 1 <sup>st</sup> Contract Amendment ADAM:<br>24SYMV016222330 2025-01-29                                                         | 1st Contract Amendment signed on 14 January 2025 between the E-GOVERNMENT CENTER for SOCIAL SECURITY Societe Anonyme (I.DI.K.A. S.A.) and the consortium of companies: Hellenic Telecommunications                                                                                 |

|    |                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                    | Organization S.A. (OTE) - BYTE Computer Industrial & Commercial Company S.A. (BYTE Computer)                                                                                                                                                                                                                                                                                                                                                                                               |
| 5  | Acceptance Protocol<br>3/31.07.2024                                                                                | Minutes of the committee for the Final acceptance of Deliverable A1.1: Implementation Study                                                                                                                                                                                                                                                                                                                                                                                                |
| 6  | Acceptance Protocol<br>6/13.12.2024                                                                                | Minutes of the committee for the final acceptance, <i>inter alia</i> , of Deliverables DA1.3 Documentation of Core platform Installation (initial installation), DA1.6 Documentation of the development and verification processes for the user interface (UI) environment (initial installation), DA1.7 Documentation of Interoperability subsystem development and testing (initial installation), DA1.8: Documentation of developer portal and interoperability registry implementation |
| 7  | Screenshot from the homepage                                                                                       | Secondary Evidence: Screenshot from My Health Platform                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8  | DA1.1 Implementation Study - Requirements Analysis: DA1.1_6_6.3_Core Platform                                      | Implementation Study deliverable: DA1.1_6_6.3_Core Platform. June 2024                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 9  | DA1.1 Implementation Study - Requirements Analysis: DA1.1_4_Data Study                                             | Implementation Study deliverable: DA1.1_4_Data Study, July 2024                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 10 | DA1.3 Documentation of Core platform Installation (initial installation)                                           | Implementation deliverable: Documentation of Core platform Installation (initial installation),                                                                                                                                                                                                                                                                                                                                                                                            |
| 11 | Clinical Data Screenshot                                                                                           | Secondary Evidence: Screenshot from the development of the openEHR Clinical Data Repository (CDR)                                                                                                                                                                                                                                                                                                                                                                                          |
| 12 | Clinical Documents Screenshot                                                                                      | Secondary Evidence: Screenshot from the development of the repository, regarding the prescription documents                                                                                                                                                                                                                                                                                                                                                                                |
| 13 | DA1.1 Implementation Study - Requirements Analysis: DA1.1_5_Standards and Codification Study                       | Implementation Study deliverable: DA1.1_5_Standards and Codification Study, June 2024                                                                                                                                                                                                                                                                                                                                                                                                      |
| 14 | Screenshot - terminologies                                                                                         | Secondary Evidence: Screenshot of the administration API for terminologies                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 15 | DA1.1 Implementation Study - Requirements Analysis<br>D A.1.1_7_Study of interoperability with third-party systems | Implementation Study deliverable: Study of interoperability with third-party systems, June 2024                                                                                                                                                                                                                                                                                                                                                                                            |
| 16 | Export from the platform, patient summary                                                                          | Export regarding the clinical history of the patient, available via cross-border interoperability, 9 June 2025                                                                                                                                                                                                                                                                                                                                                                             |
| 17 | DA1.1 Implementation Study - Requirements Analysis:                                                                | Implementation Study deliverable: D A.1.1_3_Current situation assessment & Operational Requirements prioritization, July 2024                                                                                                                                                                                                                                                                                                                                                              |

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|    | D A.1.1_3_Current situation assessment & Operational Requirements prioritization                                                   |                                                                                                                                                                                                                                                                                                                                            |
| 18 | DA1.1 Implementation Study - Requirements Analysis: DA.1.1_6_6.6_Interoperability                                                  | Implementation deliverable: DA.1.1_6_6.6_Interoperability, June 2024                                                                                                                                                                                                                                                                       |
| 19 | DA1.1 Implementation Study - Requirements Analysis: DA.1.1_6_6.2_Physical architecture                                             | Implementation deliverable: DA.1.1_6_6.2_Physical architecture, June 2024                                                                                                                                                                                                                                                                  |
| 20 | DA1.6.1 Documentation of the development and verification processes for the user interface (UI) environment (initial installation) | Implementation deliverable: Documentation of the development and verification processes for the user interface (UI) environment (initial installation) - citizens, November 2024                                                                                                                                                           |
| 21 | DA1.6.2 Documentation of the development and verification processes for the user interface (UI) environment (initial installation) | Implementation deliverable: Documentation of the development and verification processes for the user interface (UI) environment (initial installation) - healthcare professionals, November 2024                                                                                                                                           |
| 22 | DA1.7 Documentation of Interoperability subsystem development and controls (initial installation)                                  | Implementation deliverable: Documentation of Interoperability subsystem development and controls (initial installation), June 2024                                                                                                                                                                                                         |
| 23 | DA1.8 Documentation of developer portal and interoperability registry implementation                                               | Implementation deliverable: Documentation of developer portal and interoperability registry implementation, October 2024                                                                                                                                                                                                                   |
| 24 | Report by the Ministry of Health on 11 July 2025<br><br>Protocol Number: 139/11.07.2025                                            | Report by the Ministry of Health demonstrating the finalisation and putting into operation of all the elements of Subproject 1 supporting the digital transformation of the health care system as specified in the description of the milestone and investment in the CID, so that the national digital health record shall be operational |
| 25 | On-the-spot check 30 June 2025 and 08 July 2025                                                                                    | These two meetings were conducted as on-the-spot controls as provided by Article 6(4) of the Financing Agreement, in order to verify the operationalisation of the national digital health record for milestone 167.                                                                                                                       |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Finalization and putting into operation of at least all the following elements of Subproject 1 supporting the digital transformation of the health care system making national digital health record operational:**

#### 1) clinical documents

Greece provided the Request for Proposals for the project titled “National Digital Health Record”, issued on 30 March 2023 by IDIKA (e-Government Center for Social Security, under the Ministry of Digital

Governance), which is the contracting authority (evidence 2). Greece also provided the Contract, signed on 16 February 2024, between IDIKA and the two contractors (OTE A.E. – BYTE A.B.E.E.) and its amendment, signed on 14 January 2025 (evidence 3 and 4, respectively). In order to demonstrate the finalisation and putting into operation of the requirements of milestone 167, Greece provided the respective implementation deliverables of the project “National Digital Health Record” under the aforementioned contract, titled “DA1.3 Documentation of Core platform Installation (initial installation)” (evidence 10) and “DA1.7 Documentation of Interoperability subsystem development and testing (initial installation)” (evidence 22). These demonstrate that the clinical documents are stored in the Clinical Document Repository (hereinafter referred to as “CDR”), a component of the EHR Server of the Better Core Platform, which comprises the clinical data of the National Electronic Health Record (hereinafter referred to as “NEHR”) (evidence 10, pages 6-8, evidence 22, page 6). Greece also provided a screenshot from the development of the openEHR Clinical Data Repository (evidence 11) and a screenshot regarding the prescription documents to demonstrate the functionality of the CDR (evidence 12). Based on the aforementioned evidence, the Better Core Platform is structured on the OpenEHR standard, where international clinical models, archetypes, and templates are used to ensure data remains current and easily accessible. The CDR stores all clinical documents from various registries and information systems from IDIKA that interoperate with the NEHR through Application Program Interfaces (hereinafter referred to as “APIs”) - a set of rules and protocols that allows different software applications to communicate with each other. The documents can be in various document formats (PDFs, images, etc.), while the information that these documents contain is transferred to the Clinical Data Repository in the Better Core Platform.

Greece provided the implementation deliverables of the project “National Electronic Health Record” titled “DA1.6.1 Documentation of the development and verification processes for the user interface (UI) environment (initial installation)” (evidence 20) and “DA1.6.2 Documentation of the development and verification processes for the user interface (UI) environment (initial installation)” (evidence 21), which demonstrate that all the clinical data from Better Core Platform are transferred in the “MyHealth” application interface via the relevant APIs, which is accessible to both citizens and doctors, respectively. Greece also provided a screenshot from the “MyHealth” Platform (evidence 7), where the User Interface for citizens is presented.

The Commission services conducted an on-the-spot check on 30 June 2025 and on 8 July 2025, to verify the proper functioning of the Better Core Platform, where clinical documents and clinical data are stored, as well as the accessibility of the “MyHealth” application interface to both citizens and doctors in order to visualise and retrieve all the clinical information that exists in a specific “patient’s” file (evidence 25). This check was completed successfully, confirming that clinical documents and clinical data are stored in the Better Core Platform, which interoperates with the “MyHealth” application interface. Additionally, the check confirmed that the “MyHealth” application interface is accessible to both citizens and doctors in order to visualise and retrieve all the clinical information, making the NEHR operational.

## **2) terminology services**

Greece demonstrated that the terminology server, which is part of the Better Core Platform and is responsible for hosting all the codifications used in the NEHR, is finalised and operational. This is evidenced by the implementation deliverable “DA1.3 Documentation of Core platform Installation (initial installation)” (evidence 10), and the implementation deliverable “DA1.6.2 Documentation of the development and verification processes for the user interface (UI) environment (initial installation)” (evidence 21). Specifically, the terminology server is the central repository of health-related

vocabularies and terminologies, ensuring the consistent use of terms and concepts across various systems (evidence 10, pages 11-13, evidence 21, page 97).

The Commission services conducted an on-the-spot check on 30 June 2025 and on 8 July 2025, to verify the proper functioning of the terminology server in the Better Core Platform (evidence 25). This check was completed successfully, confirming that the Server is finalised and functional, as it contains necessary medical and demographic terminologies (both national and international-level codifications) which are searchable and easily accessible.

### **3) national e-health interoperability framework**

Greece provided the deliverable relevant to the implementation study of the NEHR “D A.1.1\_7\_Study of interoperability with third-party systems” (evidence 15), which demonstrates that the National eHealth Interoperability Framework for the NEHR is finalised and operational, by adopting key interoperability standards. These include compliance with the National Interoperability Framework in eHealth (evidence 15, pages 30-31), the refinement of the eHealth European Interoperability Framework (hereinafter referred to as “ReEIF”) (evidence 15, pages 16-25), the provisions of the Regulation (EU) 2025/327 for the European Health Data Space (hereinafter referred to as “EHDS”) (evidence 15, pages 31-36) and the European Electronic Health Record Exchange Format (hereinafter referred to as “EEHRxF”) (evidence 15, pages 50-52).

The NEHR, through the “MyHealth” application interface, successfully interoperates (via the implemented API interfaces) and receives data from the following systems of IDIKA and the Ministry of Health, as demonstrated in the implementation deliverables of the project (evidence 20-21, evidence 22, pages 4-34) in accordance with the requirements of the study (evidence 15):

- Electronic Prescription System
- National Registers (Cystic Fibrosis Registry, HIV Registry, Anti-Influenza Vaccination Registry, COVID-19 Vaccination Registry, Childhood and Adolescent Vaccination Registry, Spinal Muscular Atrophy Registry, Paediatric Cancer Patient Registry, National Cancer Patient Registry, National COVID-19 Patient Registry)
- Individual Electronic Health Record (IEHR)
- Sick Leave System
- Certificates (Pregnancy Certificates, Medical Examination, Certificates for Driving Licenses, Medical Examination Opinions)
- Digital Unified Surgery List
- Laboratory Results Repository
- Digital Discharge Repository
- National RIS/PACS System

For the cross-border interoperability, the Implementation Study provided by Greece (evidence 15, pages 10, 12, 50-52, 61, 125) as well as the implementation deliverable relevant to interoperability with 3<sup>rd</sup> party systems (evidence 22, page 34) demonstrate the exchange of the Patient Summary, which is a standardised, cross-border electronic health document that provides essential health information about a patient and is in line with the specifications of the EHDS and the EEHRxF. Greece also provided the standardised template of the Patient Summary, which concerns the clinical history of the patient, used for cross-border interoperability (evidence 16).

Furthermore, Greece the implementation deliverable “DA1.8 Documentation of developer portal and interoperability registry implementation” (evidence 23), which demonstrates that both a Developer Portal and a Sandbox Environment, formally called “Platform for Interoperability Compliance and

Simulation”, have been implemented as integral components of the NEHR, supporting improved eHealth interoperability. The Developer Portal serves as an informational hub, offering developers access to technical documentation and standardized APIs. It ensures that software developed by third parties aligns with national eHealth standards by including guidance and specifications for integration. The Sandbox Environment complements the portal by allowing accredited developers to test their applications in a controlled, simulated environment.

The Commission services conducted an on-the-spot check on 30 June 2025 and on 8 July 2025, to verify that the national e-health interoperability framework is finalised and operational (evidence 25). This check was completed successfully, confirming that the registries that interoperate with the NEHR through the “MyHealth” application interface correspond to the evidence that has been provided. Through the check, Greece also demonstrated the operationality of the “Platform for Interoperability Compliance and Simulation”.

#### **4) collecting all laboratory results into the e-health record**

Greece provided the implementation deliverables (evidence 20-22) which demonstrate that interoperability between the NEHR and IDIKA system, particularly the “Laboratory Results Collection Repository,” has been implemented. This allows for the collection and storage of all laboratory results within the NEHR. Both citizens and healthcare professionals can access the necessary medical information, such as results and result dates, units of measurement, diagnosis and comments (if applicable), list of additional tests, through the “MyHealth” application interface.

The Commission services conducted an on-the-spot check on 30 June 2025 and on 8 July 2025, to verify that the collection of laboratory results is finalised and operational (evidence 25). This check was completed successfully, confirming that, by demonstrating that laboratory results are available through the “MyHealth” application interface to both citizens and doctors.

#### **5) collecting discharge letters**

Greece provided the implementation deliverables (evidence 20-22) which demonstrate that interoperability between the NEHR and IDIKA system, specifically the “Administrative Discharge Repository,” has been implemented. This integration enables the collection and storage of discharge letters within the NEHR. Through the “MyHealth” application interface, both citizens and doctors can access information relevant to admission and discharge dates, hospital stay duration, and medical reasons for hospitalization.

The Commission services conducted an on-the-spot check on 30 June 2025 and on 8 July 2025, to verify that the collection of discharge letters is finalised and operational (evidence 25). This check was completed successfully, confirming that all the data relevant to hospitalization, including discharge letters, are available through the “MyHealth” application interface to both citizens and doctors.

As far as all the aforementioned elements of milestone 167 are concerned, Greece provided the relevant Acceptance Protocols by the Monitoring Committee of the Project, regarding the phases that encompass the a) implementation study, issued on 31 July 2024, (evidence 5) and b) the implementation deliverables, issued on 13 December 2024 (evidence 6), confirming the finalisation and operationality of the NEHR, as well as the Report by the Ministry of Health, issued on 11 July 2025, verifying the fulfilment of the milestone 167 (evidence 24).

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 175a Social Benefits Optimisation prepaid cards

**Related Measure:** 3,4.16726 Social Benefits Optimisation

**Qualitative Indicator:** Entry into force of legislation

**Time:** Q2 2024

### 1. Context:

The reform consists of the following components: the introduction of prepaid cards for the payment of social benefits provided by the Single Welfare Benefits Payment Authority (OPEKA) and the Public Employment Service (DYPA); and the provision of incentives to beneficiaries for using prepaid cards for the purchase of specific goods and services.

Milestone 175a requires the entry into force of legislation providing incentives to beneficiaries for using prepaid cards for the purchase of specific goods and services.

Milestone 175a is the first milestone of the reform. Following the completion of this milestone, in line with the description of the measure in the Council Implementing Decision, in the context of the upcoming milestone 175, Greece will complete the introduction of prepaid cards for the payment of the majority of social benefits provided by the Single Welfare Benefits Payment Authority (OPEKA) and the Public Employment Service (DYPA). The implementation of the reform shall be completed by 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                 |
|---|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                   |
| 2 | Law 5078/2024 (Official Gazette A' 211/20 December 2023)<br><br>Entry into force: 20 December 2023                             | Law on the "Reform of occupational insurance, rationalisation of social security legislation, pension provisions, appointment and recruitment system for educators of the Public Employment Service, and other provisions."                       |
| 3 | Joint Ministerial Decision No 3511 Government Gazzete Issue (FEK) No 1177/B/12-March 2025                                      | Joint Ministerial Decision on "Regulation of matters concerning the disbursement of social benefits through prepaid cards – Special Public Lottery Program, in accordance with Articles 152 and 154 of Law 5078/2023 (Government Gazette A' 211)" |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Entry into force of legislation providing incentives to beneficiaries for using prepaid cards for the purchase of specific goods and services.** Furthermore, in line with the description of the measure, **the provision of incentives to beneficiaries for using prepaid cards for the purchase of goods and services.**

On 20 December 2023 Law 5078/2024, "Reform of occupational insurance, rationalisation of social security legislation, pension provisions, appointment and recruitment system for educators of the

Public Employment Service, and other provisions” (evidence 2), was published in the Official Gazette A’ 211 on 20 December 2023 and entered into force at date of publication, as per Article 195 of the Law.

According to Article 152 of Law 5078/2023, the majority of the allowances, benefits, grants, and all types of monetary provisions granted by the Public Employment Service (DYPA) and the Organisation for Welfare Benefits and Social Solidarity (OPEKA), are to be credited to a special prepaid card.

The incentives to beneficiaries for using prepaid cards are detailed in Article 152 paragraph 3 of the Law 5078/2023 which stipulates that half (1/2) of the amount of each allowance, benefit or aid paid can be spent exclusively using the beneficiary’s prepaid card for purchases of products or services (including online purchases), or payments free of bank transaction costs while the cardholder is entitled to withdraw in cash from the prepaid card an amount not exceeding one half (1/2) of the allowances received. In addition, in order to promote a more widespread use of the card, paragraph 6 stipulates that the transactions for the purchase of goods or services carried out using the pre-paid card will participate in a lottery program. In Article 154 paragraph 6 the enabling conditions were set, according to which every issue regarding the lottery program would be regulated by a Joint Ministerial Decision.

On 13 March 2025 the Joint Ministerial Decision (JOI) no. 3511 entitled ‘Regulation of matters concerning the disbursement of social benefits through prepaid cards – Special Public Lottery Program, in accordance with Articles 152 and 154 of Law 5078/2023 (Government Gazette A’ 211)’ was published (evidence 3), signed by the Minister of Economy and Finance, the Minister of Labour and Social Security, the Minister of Social Cohesion and Family Affairs, the Minister of Digital Governance and the Governor of the Independent Authority of Public Revenue. Article 16 and 17 of JOI no. 3511/2025 refer to the provision, in detail, of all matters pertaining to the Public Lottery Program, including its duration, the procedure and frequency of the lotteries, the eligibility criteria and participation process, as well as the determination of the monetary rewards conferred on users of the prepaid cards. Article 19 refers to the Conduct of the Special Public Lottery Program, where it is stressed that the lottery will take place once, that for participation in the lottery there will be considered the transactions made using the prepaid benefits card and that the duration of the program will be until 31 December 2025. Article 21 refers to the funding of the program, the total amount of which is set at eight million five hundred thousand euros (€8,500,000.00) and is financed through resources from the Recovery and Resilience Facility.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Target:** 189 Independent Authority for Public Revenue: Online cash registers & Point-of-Sale (POS) – integration and interconnection

**Related Measure:** 4.1.16614 Online cash registers & POS (reform)

**Quantitative Indicator:** Number of cash registers

**Baseline:** 0

**Target:** 400000

**Time:** Q2 2024

### 1. Context:

IAPR shall develop a framework to facilitate the connection of cash registers with Point-of-Sale (hereinafter referred to as “POS”) terminals and its IT systems. The project includes: (i) the setup of specifications for the interconnection of cash registers with the POS terminals to certify that every POS transaction is recorded in the cash register and the data produced shall be transmitted in near real time to IAPR; and (ii) the development of infrastructure and applications for the monitoring of cash register transactions and the support of the control mechanism. Upon its completion, the measure is expected to limit the potential for tax evasion and ultimately reduce the VAT gap.

Target 189 consists of the integration of the relevant IT system and database within the myDATA platform, in order to enable all businesses, which are covered by the legal framework, to interconnect their online cash registers with Point-of-Sale systems to the Independent Authority for Public Revenue (IAPR). The target covers a report by the IAPR attesting the completion of the reform and indicating the total number of online cash registers that have interconnected their Point-of-Sale systems to the Independent Authority for Public Revenue. The eligible cash registers that have been interconnected will be, at least, 400 000.

Target 189 is the second and last target of the reform, and it follows the completion of milestone 188, related to the entry into force of the legal framework to facilitate the connection of cash registers with Point-of-Sales (POS) terminals and its IT systems.

The implementation of the reform shall be completed by 30 June 2024.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                   | Short description                                                                                                                                        |
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| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                         |                                                                                                                                                          |
| 2 | A report by the Independent Authority for Public Revenue (hereinafter referred to as "IAPR"), attesting the completion of the reform and indicating the total number of online cash registers that have interconnected their Point-of-Sale systems to the IAPR. The eligible cash registers shall be at least 400 000. |                                                                                                                                                          |
| 3 | Law No. 5104/2024, published in the Official Journal, Section A, No 58/19.04.2024, titled “Tax Procedure Code and other provisions”                                                                                                                                                                                    | Tax Procedure Code that codifies and updates the previous Law 4987/2022 – A 206/04-11-2022 and enters into force on 04 November 2022 as per Article 117. |

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| 4 | Decision of the Governor of the IAPR, No. A. 1021/2023, published in the Official Journal, Section B, No. 1826/22.03.2023, titled "Upgrade of active cash registers and fiscal units"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Governor's Decision that defines the upgrading of operating Electronic Cash Registers.                                                                                                                                                                                          |
| 5 | Decision of the Governor of IAPR, No. A. 1098/2022, published in the Official Journal, Section B, No. 3940/25.07.2022, titled "Determination of technical specifications (communication protocol) and other functions for the interconnection between Fiscal Electronic Mechanisms and EFT/POS terminals. Implementation in principle of "card payment collection – mandatory issuance of receipt by the Fiscal Electronic Mechanism."                                                                                                                                                                                                                                                                                                                        | Governor's Decision that defines the technical specifications and other functions regarding the interconnection between electronic cash registers and POS terminals and enters into force on 01 January 2023 as per Article 4.                                                  |
| 6 | Decision of the Governor of IAPR, No. A. 1190/2022, published in the Official Journal, titled "Amendment of IAPR Governor's Decision A1098/13-7-2022, "Determination of technical specifications (communication protocol) and other functions for the interconnection between Fiscal Electronic Mechanisms and EFT/POS terminals. Implementation in principle of 'card payment collection – mandatory issuance of receipt by Fiscal Electronic Mechanism'." (Official Gazette B' 3940)."                                                                                                                                                                                                                                                                      | Governor's Decision that updates the specifications of the initial decision A.1098/2022 and entered into force on 01 January 2023 as per Article 4.                                                                                                                             |
| 7 | Decision of the Governor of IAPR, No. A. 1155/2023, published in the Official Journal, Section B, No. 5992/13.10.2023, titled 'Determination of the scope, timing, method, and procedure for the interconnection of electronic funds transfer means at the point of sale (Electronic Funds Transfer at the Point of Sale, EFT/POS), used by the entities of Article 1 of Law 4308/2014 (Official Gazette A' 251), with their Cash Register Systems, Payment Service Providers, and the IAPR, as well as any other specific matters regarding the implementation of the provisions of Article 15B of Law 4987/2022 (Tax Procedure Code). Implementation in principle of "card payment collection – mandatory issuance of receipt by the Cash Register System.' | Governor's Decision that defines the scope of application, time, method and procedure for the interconnection of POS Terminals of the obliged entities with their Retail systems, Payment Service Providers and IAPR and enters into force on 13 October 2023 as per Article 8. |
| 8 | Decision of the Governor of IAPR, No. A.1137/2023, published in the Official Journal, Section B, No. 5380/06.09.2023, titled 'Determination of the content, procedure, method, and timing for the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Governor's Decision defines the content, procedure, method, and timing for the submission of Payment Means Declarations by domestic and foreign Payment Service Providers or Payment                                                                                            |

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|    | submission of Payment Means Declarations concerning payment card acceptance terminals and other payment means, by domestic or foreign Payment Service Providers or Payment Means Providers used by the liable entities under Article 1 of Law 4308/2014 (Official Gazette A' 251), to the IAPR, for the maintenance of the Payment Means Registry.'                                                                                                                                                                                                                                                                                                                                                      | Means Providers. It establishes the creation and maintenance of a Payment Means Registry within the IAPR's digital portal, and enters into force on 06 October 2023, as per Article 5                                                                                                                                                                     |
| 9  | Decision of the Governor of IAPR, No. A.1156/2023, published in the Official Journal, Section B, No. 5993/13.10.2023, titled 'Determination of the type, content, procedure, and timing for the submission of the Declaration of Compliance regarding the operational and interconnection requirements with the IAPR of electronic funds transfer means at the point of sale (EFT/POS), by domestic or foreign Payment Service Providers and Payment Means Providers used by the liable entities under Article 1 of Law 4308/2014 (Official Gazette A' 251), as well as any other specific matters concerning the implementation of the provisions of Article 15Γ of Law 4987/2022 (Tax Procedure Code)' | Governor's Decision sets the type, content, procedure, and deadline for submitting a Declaration of Compliance by POS system providers and enters into force on 13 October 2023 as per Article 10.                                                                                                                                                        |
| 10 | Decision of the Governor of IAPR, No. A.1157/2023, published in the Official Journal, Section B, No. 5994/13.10.2023, titled "Determination of the timing and procedure for the upgrade of Payment Means used by the entities of Article 1 of Law 4308/2014 (Official Gazette A' 251), by the Payment Means Providers (NSPs), for the completion of their interconnection process with Cash Register Systems, as well as any other specific matters regarding the implementation of the provisions of Article 15B of Law 4987/2022 (Tax Procedure Code). Amendment of Decision No. A.1021/2023 (Official Gazette B' 1826) of the Governor of the IAPR"                                                   | Governor's Decision that defines the specifications of POS upgrade deadlines and technical phases. Concretely, it defines the time and procedure for upgrading the Means of Payment by the Payment Means Providers (NSPs), for the completion of their interconnection with the Retail systems and enters into force on 13 October 2023 as per Article 3. |
| 11 | Decision of the Governor of IAPR, No. A.1171/2023, published in the Official Journal, Section B, No. 6252/31.10.2023, titled "Determination of the content, procedure, method, and timing of submission of Payment Means Declarations concerning payment card acceptance terminals and other payment means, of                                                                                                                                                                                                                                                                                                                                                                                           | Governor's Decision that updates the specifications of the initial decision A.1137/2023 and enters into force on 31 October 2023 as per Article Single (3) penultimate indent..                                                                                                                                                                           |

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|    | domestic or foreign Payment Service Providers or Payment Means Providers, used by the liable entities of Article 1 of Law 4308/2014 (Official Gazette A' 251), to the IAPR, for the maintenance of the Payment Means Registry" (Official Gazette B' 5380)"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                               |
| 12 | Decision of the Governor of IAPR, No. A.1195/2023, published in the Official Journal, Section B, No. 6859/07.12.2023, titled 'Amendment of Decision No. A.1137/06.09.2023 of the Governor of the IAPR,<br>"Determination of the content, procedure, method, and timing of submission of Payment Means Declarations concerning payment card acceptance terminals and other payment means, of domestic or foreign Payment Service Providers or Payment Means Providers, used by the liable entities of Article 1 of Law 4308/2014 (Official Gazette A' 251), to the IAPR, for the maintenance of the Payment Means Registry" (Official Gazette B' 5380)."                                                                                                                                                                         | Governor's Decision that updates the specifications of the initial decision A.1137/2023 and entered into force on 07 December 2023 as per Article Single (2). |
| 13 | Decision of the Governor of IAPR, No. A.1003/2024, published in the Official Journal, Section B, No. 80/08.01.2024, titled 'Amendment of Decision No. A.1156/12.10.2023 of the Governor of the IAPR<br>"Determination of the type, content, procedure, and timing for the submission of the Declaration of Compliance concerning the operational and interconnection requirements with IAPR of electronic funds transfer means at the point of sale (Electronic Funds Transfer at the Point of Sale, EFT/POS), by domestic or foreign Payment Service Providers and Payment Means Providers used by the liable entities under Article 1 of Law 4308/2014 (Official Gazette A' 251), as well as any other specific matters regarding the implementation of the provisions of Article 15Γ of Law 4987/2022 (Tax Procedure Code)." | Governor's Decision that updates the specifications of the initial decision A.1156/2023 and enters into force on 08 January 2024 as per Article 10.           |
| 14 | Decision of the Governor of IAPR, No. A.1027/2024, published in the Official Journal, Section B, No. 1134/16.02.2024, titled "Amendment of IAPR Governor's Decision A.1098/13-7-2022, "Determination of technical specifications (communication protocol) and other functions for the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Governor's Decision that updates the specifications of the initial decision A.1098/2022 and entered into force on 16 February 2024 as per Article Single (2). |

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|    | interconnection between Fiscal Electronic Mechanisms and EFT/POS terminals. Implementation in principle of ‘card payment collection – mandatory issuance of receipt by Fiscal Electronic Mechanism’.”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                               |
| 15 | <p>Decision of the Governor of IAPR, No. A.1035/2024, published in the Official Journal, Section B, No. 1377/29.02.2024, titled ‘Amendment of Decision No. A.1157/12.10.2023 of the Governor of the IAPR</p> <p>“Determination of the timing and procedure for the upgrade of Payment Means used by the entities under Article 1 of Law 4308/2014 (Official Gazette A’ 251), by Payment Means Providers (NSPs), for the completion of their interconnection with Cash Register Systems, as well as any other specific matters regarding the implementation of the provisions of Article 15B of Law 4987/2022 (Tax Procedure Code). Amendment of Decision No. A.1021/2023 (Official Gazette B’ 1826) of the Governor of IAPR.’</p>                              | Governor’s Decision that updates the specifications of the initial decision A.1157/2023 and enters into force on 29 February 2024, as per Article 3.                                                                                                          |
| 16 | <p>Decision of the Governor of IAPR, No. A.1042/2024, published in the Official Journal, Section B, No. 1723/15.03.2024, titled ‘Amendment of Decision No. A.1157/12.10.2023 of the Governor of the IAPR</p> <p>“Determination of the timing and procedure for the upgrade of Payment Means used by the entities under Article 1 of Law 4308/2014 (Official Gazette A’ 251), by Payment Means Providers (NSPs), for the completion of their interconnection with Cash Register Systems, as well as any other specific matters regarding the implementation of the provisions of Article 15B of Law 4987/2022 (Tax Procedure Code).” Amendment of Decision No. A.1021/2023 (Official Gazette B’ 1826) of the Governor of IAPR. (Official Gazette B’ 5994).’</p> | Governor’s Decision that updates the specifications of the initial decision A.1157/2023, and enters into force on 12 October 2023, as per the penultimate indent.                                                                                             |
| 17 | Decision of the Governor of IAPR, No. A.1054/2024, published in the Official Journal, Section B, No. 2197/11.04.2024, titled ‘Determination of the type, content, procedure, and timing for the submission of the Compatibility Declaration to be prepared by entities engaged in the import, manufacturing, and trading of Fiscal                                                                                                                                                                                                                                                                                                                                                                                                                             | Governor’s Decision setting the type, content, procedure, and timing for submitting the Declaration of Compatibility by entities involved in the supply or support of electronic cash registers or ERP systems, regarding their operation and interconnection |

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|    | Electronic Mechanisms (FEM), as well as entities active in the development and technical support of Commercial/Accounting Management Software (ERP), with respect to the operational and interconnection requirements of FEM or ERP types used by the liable entities under Article 1 of Law 4308/2014 (Official Gazette A' 251) with EFT/POS terminal types, and any other specific matters related to the implementation of Article 15B of Law 4987/2022 (Tax Procedure Code).' | requirements and enters into force on 11 April 2024, as per Article 8..                                                                                                                                                                                                                                                                                                      |
| 18 | Decision of the Governor of IAPR, No. A.1065/2024, published in the Official Journal, Section B, No. 2522/26.04.2024, entered into force on 26 April 2024, titled "Declaration of technical support information by POS/ERP providers"                                                                                                                                                                                                                                             | Governor's Decision defining the content, procedure, manner, and timing for submitting Information Declarations to the IAPR concerning technical support services for Commercial/Accounting management programs (Enterprise Resource Planning, 'ERP'), for the purpose of maintaining a register of these services and enters into force on 26 April 2024 as per Article 5.. |
| 19 | Correction of errors published in the Official Journal, Section B, No. 2651/02.05.2024, entered into force on 2 May 2024, titled "Corrigendum to Decision A.1065/2024"                                                                                                                                                                                                                                                                                                            | Error correction of the A.1065/2024 Governor's decision and enters into force on 03 May 2024, the day of publication to the Official Journal.                                                                                                                                                                                                                                |
| 20 | Decision of the Governor of IAPR, No. A.1074/2024, published in the Official Journal, Section B, No. 2668/02.05.2024, titled "Amendment of Decision No. A.1155/9.10.2023 by the Governor of the IAPR"                                                                                                                                                                                                                                                                             | Governor's Decision updating the original Decision A.1155/2023, including amendments that extend its scope. It also defines alternative methods for interconnection with Payment Institutions when the Fiscal Electronic Mechanism is integrated with commercial/accounting software (ERP) and enters into force on 02 May 2024 as per Article 3.                            |
| 21 | Correction of errors published in the Official Journal, Section B, No. 2906/23.06.2024, titled "Correction of an error in Decision No. A.1074/2.5.2024 of the Governor of the IAPR, published in the Government Gazette (B' 2668)"                                                                                                                                                                                                                                                | Error correction of the A.1074/2024 Governor's decision and enters into force on 23 June 2024, the day of publication.                                                                                                                                                                                                                                                       |
| 22 | Decision of the Governor of IAPR, No. A.1075/2024, published in the Official Journal, Section B, No. 2668/02.05.2024, titled "Amendment of Decision No. A.1157/12.10.2023 by the Governor of the IAPR "Determination of the timing and procedure for the upgrade of Payment Methods used by entities under Article 1 of                                                                                                                                                           | Governor's Decision that updates the specifications of the initial decision A.1157/2023 and enters into force on 02 May 2024 as per Article Single, penultimate indent.                                                                                                                                                                                                      |

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|    | Law 4308/2014 (Government Gazette A' 251), by Payment Service Providers (NSPs), to complete their interconnection process with Cash Register Systems, as well as any other specific issues related to the implementation of the provisions of Article 15B of Law 4987/2022 (Code of Fiscal Procedures). Amendment of Decision No. A.1021/2023 (Government Gazette B' 1826) of the Governor of IAPR." (Government Gazette B' 5994)"                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                               |
| 23 | Decision of the Governor of IAPR, No. A.1101/2024, published in the Official Journal, Section B, No. 3804/01.07.2024, titled "Amendment of Decision No. A.1157/12.10.2023 of the Governor of the IAPR<br>"Determination of the timing and procedure for the upgrade of Payment Methods used by entities pursuant to Article 1 of Law 4308/2014 (Government Gazette A' 251), by Payment Service Providers (NSPs), for the completion of the interconnection process with Cash Register Systems, as well as any other specific matters concerning the implementation of the provisions of Article 15B of Law 4987/2022 (Code of Fiscal Procedures). Amendment of Decision No. A.1021/2023 (Government Gazette B')" 1826) of the Governor of IAPR." (Government Gazette B' 5994)"                        | Governor's Decision that updates the specifications of the initial decision A.1157/2023 and enters into force on 01 July 2024 as per Article Single (3).                                                                                                                                                                                                      |
| 24 | Decision of the Governor of IAPR, No. A.1102/2024, published in the Official Journal, Section B, No. 3804/01.07.2024, titled "Amendment of Decision No. A.1155/9.10.2023 of the Governor of the IAPR "Determination of the scope, timing, manner, and procedure for the interconnection of Electronic Funds Transfer at the Point of Sale (EFT/POS) payment methods used by entities under Article 1 of Law 4308/2014 (Government Gazette A' 251) with their Cash Register Systems, Payment Service Providers, and the IAPR, as well as any other specific matters related to the implementation of the provisions of Article 15B of Law 4987/2022 (Code of Fiscal Procedures)." Implementation, in principle, of the "card payment collection – mandatory issuance of a receipt by the Cash Register | Governor's decision that updates the technical specifications and enables POS terminals to operate independently during loss of connection between the retail systems of obligated entities, Payment Service Providers, and the IAPR, as well as during the replacement of the cash register and enters into force on 01 July 2024 as per Article Single (3). |

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|    | System” (Government Gazette B’ 5992 and B’ 6514)”. ”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                              |
| 25 | <p>Decision of the Governor of IAPR, No. A.1116/2024, published in the Official Journal, Section B, No. 4295/22.07.2024, titled “Amendment of Decision No. A.1157/12.10.2023 of the Governor of the IAPR</p> <p>“Determination of the timing and procedure for the upgrade of Payment Methods used by entities under Article 1 of Law 4308/2014 (Government Gazette A’ 251), by Payment Service Providers (NSPs), for the completion of the interconnection process with Cash Register Systems, as well as any other specific matters related to the implementation of the provisions of Article 15B of Law 4987/2022 (Code of Fiscal Procedures).Amendment of Decision No. A.1021/2023 (Government Gazette B’ 1826) of the Governor of IAPR.(Government Gazette B’ 5994)”</p> | Governor’s Decision that updates the specifications of the initial decision A.1157/2023 and enters into force on 22 July 2024 as per Article Single (3).     |
| 26 | <p>Decision of the Governor of IAPR, No. A.1146/2024, published in the Official Journal, Section B, No. 5462/01.10.2024, titled “Amendment of Decision No. A.1157/12.10.2023 of the Governor of the IAPR</p> <p>"Determination of the timing and procedure for the upgrade of Payment Methods used by entities under Article 1 of Law 4308/2014 (Government Gazette A’ 251) by Payment Method Providers (NSPs), for the completion of the interconnection process with Cash Register Systems, as well as any other specific matter related to the implementation of the provisions of Article 15B of Law 4987/2022 (Tax Procedure Code). Amendment of Decision No. A.1021/2023 (Government Gazette B’ 1826) of the Governor of IAPR." (Government Gazette B’ 5994)”</p>        | Governor’s Decision that updates the specifications of the initial decision A.1157/2023 and enters into force on 31 December 2024 as per Article Single (3). |
| 27 | <p>Decision of the Governor of IAPR, No. A.1205/2024, published in the Official Journal, Section B, No. 7312/31.12.2024, titled “Amendment of Decision No. A.1157/12.10.2023 of the Governor of the IAPR “Determination of the timing and procedure for upgrading Payment Methods</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Governor’s Decision that updates the specifications of the initial decision A.1157/2023 and enters into force on 31 December 2024 as per Article Single (3). |

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|    | <p>used by entities under Article 1 of Law 4308/2014 (Government Gazette A' 251), by Payment Service Providers (NSPs), for the completion of their interconnection with Cash Register Systems, as well as any other specific matters related to the implementation of the provisions of Article 15B of Law 4987/2022 (Tax Procedure Code).</p> <p>Amendment of Decision No. A.1021/2023 (Government Gazette B' 1826) of the Governor of IAPR." (Government Gazette B' 5994)"</p>                                                                                                                                                                                                                                                                             |                                                                                                                                                                                     |
| 28 | <p>Decision of the Governor of IAPR, No. A.1037/2025, published in the Official Journal, Section B, No. 912/28.02.2025, titled "Amendment of Decision No. A.1157/12.10.2023 of the Governor of the IAPR</p> <p>"Determination of the timing and procedure for upgrading Payment Methods used by entities under Article 1 of Law 4308/2014 (Government Gazette A' 251), by Payment Service Providers (NSPs), for completing the interconnection process with Cash Register Systems, as well as any other specific issues related to the implementation of the provisions of Article 15B of Law 4987/2022 (Tax Procedure Code). Amendment of Decision No. A.1021/2023 (Government Gazette B' 1826) of the Governor of IAPR." (Government Gazette B' 5994)"</p> | <p>Governor's Decision that updates the specifications of the initial decision A.1157/2023 and enters into force on 12 October 2023 as per Article Single (2).</p>                  |
| 29 | <p>Decision No. POL. 1002/2015, published in the Official Journal, Section B, titled "Categories of Entities Exempted from the Use of Fiscal Electronic Mechanisms. Inclusion of Additional Details on Issued Retail Sale Documents for Certain Categories of Services or Goods. Declaration of Discontinuation of Operation of Fiscal Electronic Mechanisms Due to Technical Problems."</p>                                                                                                                                                                                                                                                                                                                                                                 | <p>Governor's Decision No. POL. 1002/2015, updating the specifications of the initial decision A.1157/12.10.2013, entering into force on 12 October 2013 pursuant to Article 3.</p> |
| 30 | <p>Law No. 4308/2014, titled "Greek Accounting Standards, relevant regulations and other provisions," published in the Government Gazette, Issue A, No. 251, 24 November 2014.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>Law No. 4308/2014 (Government Gazette A' 251/24.11.2014), establishing Greek Accounting Standards, effective from 31 December 2014 and 1 January 2015 as specified.</p>          |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target.

**Integration of the relevant IT system and database within the MyData platform - all businesses under the legal framework have interconnected their online cash registers with Point-of-Sale systems to the Independent Authority for Public Revenue.**

The report on the completion of milestone 189 (evidence 2, p.1-2) describes the mandatory interconnection of all businesses to the platforms of the IAPR by reference to the relevant legislation. Concretely, Article 17 of the Tax Procedure Code (law 5104/2024, Official Journal A 58/19.04.2024, evidence 3) in combination with Article 1 of law 4308/2014 (Official Journal A 251/24.11.2014, evidence 30) provides for this obligation upon all businesses which have the obligation to use a cash register (or alternatively an e-invoicing provider) concerning their retail sales (see page 2 of the completion report, evidence 2). Exemptions to the total obligation of interconnection were provided in Decision 1002/2015 (Government Gazette B 03/05.01.2015, evidence 29) of the Governor of the Secretary General for Public Revenue (currently Governor of IAPR) for transactions of entities that are exempted from the interconnection obligation, and which can be carried out by issuing paper retail receipts. Therefore, these cases were excluded from the beginning of the scope of the legal framework, which still applies.

The completion report (pages 3-4, evidence 2) explains also the technical details for the interconnection through two protocols to ensure that all available retail systems in the market are covered: one for conventional cash registers and another for Enterprise Resource Planning (hereinafter referred to as “ERPs”)-based retail systems. Data is transmitted to IAPR via specific IT tools managed by IAPR (i.e. eSEND for cash registers and myDATA for ERPs), giving the possibility to IAPR to monitor and audit in near real-time transactions. The technical details of the integration of POS with cash registers or ERPs with the relevant platforms of the IAPR are described in legislation including i) the Annex of Decision 1098/2022 of the Governor of the IAPR (as published in Official Journal B 3940/25.07.2022, evidence 5) as concerns the interconnection protocols of POS terminals with electronic/online cash registers and the IAPR and ii) in Annex A of Decision 1155/2023 of the Governor of the IAPR (as published in Official Journal B 5992/13.10.2023, evidence 7) as concerns the interconnection protocols of POS terminals with the retail systems and the IAPR for ERP-based transactions.

#### **A report by the Independent Authority for Public Revenue attesting the completion of the reform**

The report on the completion of milestone 189 (evidence 2) provides the formal and technical elements demonstrating the completion of the reform. Concretely, the report sets out the mandatory nature of the interconnection of POS terminals and retail systems of any type (electronic/online cash registers, ERPs) with the IAPR systems based on the adopted primary and secondary legislation (evidence 3, 5 and 7). Moreover, the legislation provides for the obligation of acquirers of POS and of entities that import, produce or sell cash registries to ensure the suitability and compatibility of the cash registries with the POS as regards their interconnectivity with the IAPR systems (see Articles 17 and 18 of the Tax Procedure Code, Law 5104/2024 (Official Journal A 58/19.04.2024), evidence 3). Finally, the completion report sets out the comprehensive nature of the reform referring to sanctions incurred in case of non-observance of the relevant legal obligation by the users of POS terminals (see page 3 of the completion report, evidence 2). Concretely, Article 63(1) of the Tax Procedure Code, law 5104/2024 (Official Journal A 58/19.04.2024, evidence 3) provides for a fine of EUR 10,000 (for single-entry accounting systems) and EUR 20,000 (for double-entry accounting system), in case of users of POS terminals who do not comply with the requirements of operation and interconnection with the IAPR. Article 63(2) of the Tax Procedure Code provides for the doubling of the aforementioned fines in case of recidivism within a five-year period. As regards enforcement, the audits performed by the IAPR demonstrate that the phenomenon of non-compliance with the obligation to interconnect the POS and cash registries and

ERP-based transactions with the IAPR systems is rather limited and with a declining trend (see completion report, page X, evidence 2). Concretely, the data reported by the IAPR for 2024 and 2025 is the following:

- In the first half of 2024, 33,838 audits were conducted. Among these, 186 entities (0.55% of the audits) were found to have committed 1,106,118 violations related to non-transmission of data, with a net concealed value of €12,726,282.
- In the first half of 2025, 26,912 audits were conducted. Among these, 61 entities (0.23% of the audits) were found to have committed 188,760 violations related to non-transmission of data, with a net concealed value of €2,541,600.

**and indicating the total number of online cash registers that have interconnected their Point-of-Sale systems to the Independent Authority for Public Revenue. The eligible cash registers shall be at least 400,000.** In line with the description of the measure, **the project includes the setup of specifications for the interconnection of cash registers with the POS terminals to certify that every POS transaction shall be recorded in the cash register and the data produced shall be transmitted in near real time to IAPR.**

The Commission services conducted an on-the-spot check on 30 July 2025, to verify that i) the relevant database and system have been integrated into the myDATA platform to enable interconnection and transmission of transaction data to the IAPR; ii) every POS transaction is recorded in the cash register and the data produced is transmitted in near real time to IAPR and iii) the total number of online cash registers that have interconnected their Point-of-Sale systems to the IAPR are at least 400 000. This check was completed successfully, confirming that the integration of the relevant database and system into the myDATA platform is complete, that the transaction data is transmitted to the IAPR at near real time and that at least 400 000 online cash registers have been interconnected].

**The target is further specified in the Operational Arrangements, which requires that the term cash register includes both online cash registers and e-invoicing systems for retail sales.** Two interconnection protocols were implemented to cover all retail systems in the market. The first protocol, governed by Decision A 1098/2022 (evidence 5), applies to businesses using conventional cash registers, where each cash register connects one-to-one with a POS terminal. The second protocol, A 1155/2023 (evidence 7), applies to businesses using ERP systems, which issue receipts through fiscal devices or electronic invoicing providers. In the latter's case, multiple POS terminals connect through a single e-invoicing provider. For calculating the target, POS connections to e-invoicing system are considered a more accurate measure of actual interconnections. Therefore, to assess the target of 400,000, both the total number of conventional cash registers connected to POS terminals and the POS terminals connected via e-invoicing systems should be included.

Furthermore, in line with the description of the measure, **the project includes the development of infrastructure and applications for the monitoring of cash register transactions and the support of the control mechanism.**

As detailed above, the IAPR has developed an interconnection system through two protocols to ensure that all available retail systems in the market are covered: one for conventional cash registers and another for Enterprise Resource Planning (ERPs)-based retail systems. Data is transmitted to IAPR via specific IT tools that have been developed and are being managed by IAPR (i.e. eSEND for cash registers and myDATA for ERPs), giving the possibility to IAPR to monitor and audit the transactions.

The POS registry application, developed internally by IAPR, provides a web interface that delivers business registry details such as company name and address, along with comprehensive information about their POS systems. It also shows the interconnection status, including cash register IDs and TIDs based on decision A 1098/2022 (evidence 5), and indicates whether the POS is connected according to decision A 1155/2023 (evidence 7). Additionally, it offers data on the business's cash registers. Users can view technicians supporting each business through the Register of Provided Technical Support

Services for Online Tax Mechanisms and the Statements of Information regarding technical support for "ERP" Commercial and Accounting management programs. All these applications are accessible online via IAPR's internal network to employees conducting audits upon request (see above the section on the enforcement of sanctions applied in case on non-interconnection)

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 204 Completion of initial tax codification and taxpayer information system

**Related Measure:** 4,1.16643 Codification and simplification of tax legislation

**Qualitative Indicator:** a: Entry into force of codified primary and secondary tax legislation. 2. Proofs of acceptance of deliverables about the setup of Content management system and dedicated website for taxpayer information.

**Time:** Q2 2024

### 1. Context:

The measure includes the codification of critical tax and customs legislation and its publication in a dedicated website for taxpayer information for enhancing transparency, legal certainty, tax compliance and the business environment.

Milestone 204 consists of 2 parts as follows:

a. Entry into force of Codification of the primary and secondary legislation to simplify and update the legislation in the light of digitisation and EU best practices including:

- VAT code
- Stamp duty
- Property taxes
- State Debt Collection (KEDE)
- National Customs Code

b. Set up of Content management system and dedicated website for taxpayer information.

Milestone 204 is the fourth and penultimate milestone of the reform, and it follows the completion of milestone 199, milestone 202 and milestone 203, related to the schedule for deliverables on Tax Codification, the set-up of dedicated tax unit at the Ministry of Finance and the entry into force of codified Income Tax Code and Code of Tax Administration respectively. Following milestone 204, milestone 204a concerns the uploading of primary and secondary tax legislation for the Tax Procedure Code, Income Tax Code, VAT Code, Stamp duty, Property Taxes, State Debt Collection (KEDE), and National Customs Code to the Content Management System and its publication on the dedicated website for taxpayer information. The reform has a final expected date of implementation of end of 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                |
|---|--------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                  |
| 2 | Law 5144/2024, entitled "Code of Value Added Tax"<br>Published in the Official Journal, section A, No 162 on 11 October 2024   | The Law concerns the Codification of the VAT code currently in force                                             |
| 3 | Law 5135/2024, entitled "Digital transaction fee, VAT and other provisions", published in the Official                         | The Law 5135/2024 concerns the Codification of the new digital transaction fee replacing the existing stamp duty |

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|    | Journal, section A, No 147 on 16 September 2024                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                              |
| 4  | Law 5177/2025, entitled “Ratification of the Code of indirect taxes on transactions of the scope of application of the Tax Procedure Code and the rest of indirect taxes”, published in the Official Journal, section A, No 21 on 14 February 2025                     | The Law 5177/2025 concerns the Codification of indirect taxes on transactions within the scope of the Tax Procedure Code, as well as other indirect taxes. This law also incorporated the new digital transaction fee.                                                       |
| 5  | Decision A.1149/2024 entitled “Determination of the formalities and the content of the declaration of the digital transaction fee [...] as well as the refund of the digital transaction fee”, published in the Official Journal, section B, No 5578 on 7 October 2024 | Governor’s Decision (A.1149/2024) which defines all the needed information and procedures regarding the new digital tax                                                                                                                                                      |
| 6  | Law 5219/2025 entitled “Code of Property Taxation”, published in the Official Journal, section A' No 130 on 18 July 2025                                                                                                                                               | The Law concerns Property Taxes currently in force                                                                                                                                                                                                                           |
| 7  | Law 4978/2022, entitled “Code for collection of public debt”, published in the Official Journal, section A, No 190 on 7 October 2022                                                                                                                                   | The Law concerns the Codification of the Public Debt Collection (KEDE) currently in force                                                                                                                                                                                    |
| 8  | Law 5222/2025, entitled “National Customs Code and other provisions, published in the Official Journal, section A’, no 134 on 28 July 2025                                                                                                                             | The Law concerns the Codification of the previous National Customs Code (Law 2960/2001).                                                                                                                                                                                     |
| 9  | Decision 110081/2025, entitled “Terms, conditions, and effective date for the implementation of the digitized handwritten signature”, published in the Official Journal, section B’, no 4156 on 30 July 2025                                                           | Decision 110081/2025 of the Governor of the IAPR sets out the terms, conditions, and effective date for the implementation of the digitized handwritten signature, in accordance with paragraph 5 of Article 6 and point (a) of paragraph 6 of Article 194 of Law 5222/2025. |
| 10 | Decision A1107/2025, entitled “Determination of the terms, conditions, required documentation, maximum granted                                                                                                                                                         | Joint Decision A1107/2025 (OJ B’ 4159/30-07-2025) of the Deputy Minister of National Economy and Finance and the Governor of IAPR, concerns the determination of the terms,                                                                                                  |

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|    | quantities, and the procedure for granting exemption from customs and tax charges on alcoholic beverages and manufactured tobacco products subject to excise duty, as well as other excise duty goods, within the framework of diplomatic and consular relations”, published in the Official Journal, section B’, no 4159 on 30 July 2025                                                                                                                                                                                                                                                              | conditions, required documentation, maximum granted quantities, and the procedure for granting exemption from customs and tax charges on alcoholic beverages and manufactured tobacco products subject to excise duty, as well as other excise duty goods, within the framework of diplomatic and consular relations, in application of Article 196 of the National Customs Code (Law 5222/2025, OJ A’134).                                                                                                                                                   |
| 11 | Decision A1106/2025, entitled “Terms, conditions, and procedure for:<br>a) The destruction of manufactured tobacco products, electrically heated tobacco products and electrically heated products without tobacco, tobacco tax stamps, tobacco dust, other residues from tobacco manufacturing, equipment, as well as critical raw materials used in the production of manufactured tobacco products, and<br>b) The establishment and operation of the Committee for the destruction of the aforementioned products and items”, published in the Official Journal, section B, no 4162 on 30 July 2025 | Decision A1106/2025 of the Governor of the IAPR sets out the terms, conditions, and procedure for:<br>a) The destruction of manufactured tobacco products, electrically heated tobacco products and electrically heated products without tobacco, tobacco tax stamps, tobacco dust, other residues from tobacco manufacturing, equipment, as well as critical raw materials used in the production of manufactured tobacco products, and<br>b) The establishment and operation of the Committee for the destruction of the aforementioned products and items. |
| 12 | Decision A.1104/2025, entitled “Definition of terms and conditions for the granting of a license to an authorized warehouse keeper of products subject to Excise Duty”, published in the Official Journal, section B, no 4160 on 30 July 2025                                                                                                                                                                                                                                                                                                                                                          | Decision A.1104/2025 of the Deputy Minister of National Economy and Finance amends Decision No. ΔΕΦΚΦ 1116601 ΕΞ 2017/31.07.2017 of the Deputy Minister of Finance and concerns the "Definition of terms and conditions for the granting of a license to an authorized warehouse keeper of products subject to Excise Duty".                                                                                                                                                                                                                                  |
| 13 | Decision A.1105/2025, entitled “determination of the terms and formalities for the receipt of ethyl alcohol exempt from Excise Duty”, published in the Official Journal, section B, no 4161 on 30 July 2025                                                                                                                                                                                                                                                                                                                                                                                            | Decision A.1105/2025 of the Deputy Minister of National Economy and Finance on the determination of the terms and formalities for the receipt of ethyl alcohol exempt from Excise Duty, pursuant to Article 196 of the National Customs Code.                                                                                                                                                                                                                                                                                                                 |
| 14 | Request for Proposals<br>ADAM:<br>23PROC013864006 2023-11-30                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Request for Proposals regarding the electronic open tender above the threshold for the award of a service contract titled: ‘Development of Content and Workflow Management Systems / Development of a Legislative Information System and Content’                                                                                                                                                                                                                                                                                                             |
| 15 | Contract with ADAM:<br>24SYMV015479945 2024-09-25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Contract signed between the Independent Authority of Public Revenue and the contractor                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|----|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                  | NOVA Information and Communication Technologies                                                                                                                                                                                                                                                    |
| 16 | Contractor's Cover Note<br>24 March 2025                                                         | Contractor's Cover Note regrading, <i>inter alia</i> , the submission of deliverable Π2.2 of the contract "Development of Content and Workflow Management Systems / Development of a Legislative Information System and Content" as well as the URLs accessing the portal, the editor and the BPMS |
| 17 | Deliverable Π2.2.a                                                                               | Sub-deliverable of Π2.2 of the contract "Development of Content and Workflow Management Systems / Development of a Legislative Information System and Content" entitled "User Manual for the Portal and Legislative Search"                                                                        |
| 18 | Deliverable Π2.2.b                                                                               | Sub-deliverable of Π2.2 of the contract "Development of Content and Workflow Management Systems / Development of a Legislative Information System and Content" entitled "User Manual for the Specialized Legal Text Editor"                                                                        |
| 19 | Deliverable Π2.2.c                                                                               | Sub-deliverable of Π2.2 of the contract of the contract "Development of Content and Workflow Management Systems / Development of a Legislative Information System and Content" entitled "User Manual for the Business Process Management System"                                                   |
| 20 | Deliverable Π2.2.d                                                                               | Sub-deliverable of Π2.2 of the contract "Development of Content and Workflow Management Systems / Development of a Legislative Information System and Content" entitled "Methodology for applying ontologies and the semantic model to tax and customs"                                            |
| 21 | Acceptance protocol issued by the Acceptance Committee<br>Protocol Number:<br>1037081/01.04.2025 | Acceptance protocol issued by the Acceptance Committee regarding the acceptance of the project's deliverables, <i>inter alia</i> , deliverable Π2.2 for the contract "Development of Content and Workflow Management Systems / Development of a Legislative Information System and Content".       |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**a. Entry into force of Codification of the primary and secondary legislation to simplify and update the legislation in the light of digitisation and EU best practices including:**

**-VAT code**

As regards primary legislation, the authorities have provided evidence for the official publication of the VAT Code, law 5144/2024 (evidence 2.), Official Journal A 162/11.10.2024) and its entry into force on 11 October 2024 as foreseen by Article Second.

As regards secondary legislation, the existing provisions remain in force after the publication of the VAT Code as per article 71(2) of the VAT Code (evidence 2).

Moreover, the authorities have provided evidence that the new VAT Code updates the legislation in light of digitalisation and EU best practices deriving from EU legislation and frameworks of international organisations as follows:

- principle of predictability: articles 1-3 of the VAT code.
- alignment with digital economy/digitalisation: article 6 of the VAT code.
- exemptions for essential services and goods that reduce inequalities in line with the Country Specific Recommendations of the European Semester and the VAT Directive: articles 27-34 of the VAT code.
- compliance with EU transparency standards: articles 40-42 of the VAT Code.
- simplification of VAT obligations – introduction of special regimes, while tackling fraud: Articles 44–58 of the VAT Code.
- provisions aiming at boosting competitiveness and growth in line with the Country Specific Recommendations of the European Semester: article 70 of the VAT Code.

#### **- Stamp duty**

The authorities have provided evidence for the official publication of new primary legislation, law 5135/2024 on the digital transactions fee in the Official Journal A 147/16.9.2024 (evidence 3) and its entry into force (1.12.2024 – see article 32(2) of law 5135/2024). The provisions of law 5135/2024 replace the stamp duty with the new digital transaction fee. To ensure simplification, the provisions of law 5135/2024 have been codified into a Single Code of Indirect Taxes, law 5177/2025 (evidence 4) entitled “Code of Indirect taxes on the transactions of the scope of application of the Tax Procedure Code as well as other indirect taxes”. The authorities provided evidence for the official publication of law 5177/2025 in the Official Journal A 21/14.2.2025 and its entry into force on 14 February 2025 (evidence 4).

Secondary legislation for the implementation of the provisions of law 5135/2024 as codified later on in law 5177/2025 has been adopted pursuant to enabling provision 31 of law 5135/2024 (evidence 3). Specifically, the authorities have provided evidence for the official publication of Decision 1149/2024 (evidence 5) of the Governor of the “IAPR” on the determination of the form and content of the declaration of the Digital Transaction Fee in the Official Journal B 5578 B/7.10.2024) and its entry into force on 1 December 2024 (as foreseen in article third). Decision 1149/2024 of the Governor of the IAPR (see above, evidence 5) sets out the regulatory framework for the implementation of the digital transaction levy through the myAADE portal.

Law 5135/2024 (evidence 3) as codified in law 5177/2025 (evidence 4) simplifies and updates legislation in the light of digitisation and EU best practices deriving from EU legislation and frameworks of international organisations, as follows:

- Digital economy and digitisation: The new provisions repeal and replace the old legislation which dated back in 1931 and the relevant paper-based stamp duty system. The new provisions of law 5135/2024 as codified in law 5177/2025 introduce the digital transaction levy and provide for a system of declaration and payments which are carried out through the digital platform of the IAPR (article 2 of law 5177/2025(evidence 4)) aiming at aligning legislation with the needs of digital economy and digital transactions.

- Predictability: Article 1-5 of law 5177/2025.
- Reduction of bureaucracy and simplification: law 5177/2025 provides for fully digital filing (article 2), unified rates (article 4) and transitional provisions affording legal certainty.
- Broadening of the tax base: Articles 6-29 of law 5177/2025.
- Avoidance of double taxation: article 4 of law 5177/2025.
- Combating tax avoidance (ADAT): Art. 4 of law 5177/2025
- Consistency with VAT: Article 4 of law 5177/2025.

#### **- Property taxes**

The authorities have provided evidence for the official publication of the Property Taxation Code, law 5219/2025 in the Official Journal A 130/18.07.2025 and its entry into force on 18 July 2025 (article Second, evidence 6).

As regards secondary legislation, the authorities have provided evidence (article 123(10) of the Property Taxation Code, evidence iv)) that secondary legislation already issued by virtue of enabling provisions of the codified laws, will remain in force.

The authorities have provided evidence that the Property Taxation Code simplifies and updates legislation in the light of digitalisation and EU best practices deriving from EU legislation and frameworks of international organisations as follows:

- Digitalisation: the obligation of the notaries to submit a copy of the real estate transfer contract to the local tax offices was repealed by virtue of article 21 of the Property Taxation Code (evidence 6) because of the digital submission of contracts.
- Simplification: articles 38, 40, 76 of the Property Taxation Code provide for the option to submit a certificate of a civil engineer instead of a certificate issued by public authorities and a topographic plan that were required in the past.

#### **- State Debt Collection (KEDE)**

The authorities have provided evidence for the official publication of the Codification of the State Debt Collection (KEDE), Law 4978/2022 in the Official Journal A' 190/7.10.2022 and its entry into force (7.10.2022, article 2 of KEDE, evidence 7).

Secondary legislation issued under the enabling provisions of old legislation (legislative decree 356/1974 or of the former KEΔE) remains in force as per the provisions of article 85(2) of KEDE. The codification does not require the issuance of additional secondary legislation for its enactment.

The authorities have provided evidence that KEDE simplifies and updates legislation in the light of digitisation and EU best practices, deriving from EU legislation and frameworks of international organisations as follows:

- Principles of fairness, transparency and legal certainty concerning the tax collection process: article 4-7 of KEDE define clear notification procedures for taxpayers, exceptions and grace periods prior to which enforcement measures cannot be applied.
- Principle of tax compliance in combination with the principle of proportionality: articles 7-9 of KEDE.
- Tax fairness and reduction of inequalities: articles 17-18 of KEDE.
- Digitalisation: articles 19-21 of KEDE.
- Promotion of economic stability and reducing barriers to investments: article 64 of KEDE.
- Protection of taxpayers' rights and due process: article 65 of KEDE.

#### **- National Customs Code**

The authorities have provided evidence for the official publication of the National Customs Code, Law 5222/2025 in the Official Journal A' 134/28.7.2025 and its entry into force on 28 July 2025 (evidence viii, article 275).

Concerning secondary legislation, the authorities have provided evidence as follows:

- Existing secondary legislation remains in force as provided for in article 201(7) of the National Customs Code (evidence 8).
- Secondary legislation which is mandatory for the implementation of the National Customs Code (evidence 8) has been issued and been entered into force as follows:
  - Decision No. 110081/2025 (Official Journal B' 4156/30-07-2025, evidence ix) of the Governor of the IAPR was issued and entered into force on 30 July 2025 (article 7, evidence 9) concerning the digitized handwritten signature, pursuant to article 6 (5) point (a) and article 194 (6) of the National Customs Code.
  - Joint Decision A.1107/2025 (Official Journal B' 4159/30-07-2025, evidence 10) of the Deputy Minister of National Economy and Finance and the Governor of the IAPR was issued and entered into force on 30 July 2025 (article 6), concerning the granting exemption from customs and tax charges on alcoholic beverages and manufactured tobacco products subject to excise duty, adopted pursuant to Article 196 (1) and (15) of the National Customs Code.
  - Decision A.1106/2025 (Official Journal B' 4162/30-07-2025, evidence 11) of the Governor of the IAPR entered into force on 30 July 2025 (article 11) on manufactured tobacco products and others pursuant to article 196 of the National Customs Code.
  - Decision A.1104/2025 (Official Journal B' 4160/30-07-2025) of the Deputy Minister of National Economy and Finance amends Decision No. ΔΕΦΚΦ 1116601 ΕΞ 2017/31.07.2017 on authorized warehouse keeper of products which entered into force on 30 July 2025 (article 3) pursuant to article 196 of the National Customs Code (evidence 12).
  - Decision A.1105/2025 (Official Journal B' 4161/30-07-2025, evidence 13) of the Deputy Minister of National Economy and Finance was issued and entered into force on 30 July 2025 (article 8), setting out the terms and formalities for the receipt of ethyl alcohol exempt from Excise Duty.

The authorities have provided evidence that the National Customs Code (evidence 8) simplifies and updates legislation in the light of digitisation and EU best practices, as follows:

- Digitalisation
  - Article 6 (5)- digital signature for inspections, Article 93 - electronic registry for distillation equipment and small-scale distillers, Article 105 - expands the unified logistics registry for tobacco products to include e-cigarettes and new tobacco forms, Article 170- Electronic notification of fine imposition, Article 5- Interoperability with other public services.
- Simplification and administrative burden reduction
  - Article 7: Off-hours service, Articles 30, 31, 33, 34- Simplified customs regimes, Article 192-Acceleration of administrative actions
- Harmonisation with Union Customs Code and EU best practices
  - Article 4 - New definitions and core concepts, Articles 25, 26- Management of customs debt and guarantees, Article 5- Customs cooperation with enforcement authorities with clear procedures, Articles 18, 19, 20, 21, 47, 48- Customs procedures for passenger luggage, hazardous goods, and postal shipments, which are fully harmonized with the Customs Union Code.

#### **b. Set up of Content management system and dedicated website for taxpayer information.**

The authorities have provided evidence for the set-up of the Content Management System in the IAPR aiming at enhancing transparency, legal certainty, tax compliance and the business environment.

Specifically, the authorities have proven the delivery and acceptance of the relevant deliverable of a service contract.

Concretely, the authorities published the request for proposals regarding the electronic open tender above the threshold for the award of a service contract entitled *“Development of Content and Workflow Management systems/ Development of a Legislative Information System and Content”* under protocol number 23PROC0138640062024-11-30 (evidence 14, page 9 describes the objective of the contract). The contract was signed between the IAPR and the NOVA Information and Communication Technologies with number 837/2024 and 24SYMV015479945 (evidence 15, page 5 describes the scope of the services to be provided).

The contractor submitted on 24.3.2024 (evidence 16, see cover note of the contractor) inter alia, deliverable P.2.2 “Installed content management system and dedicated information website for taxpayers in operation” with 4 sub-deliverables as follows:

- a) User manual for the portal and legislative search (evidence 17)
- b) User manual for the specialised legal text editor (evidence 18)
- c) User manual for the business process management system (evidence 19)
- d) Methodology for applying ontologies and the semantic model to tax and customs. (evidence 20)

The deliverable P.2.2 concerns the creation of a content management system that is operational, as well as the creation of a dedicated website for informing taxpayers. It includes full functionality of the content management system, with a workflow implemented for at least one (1) content category, as well as integration with the website.

The website includes at least one (1) codified piece of legislation, the Tax Procedure Code (see link below), including the linking of primary and secondary legislation and the representation of the chronological evolution of its amendments.

Finally, the deliverable includes a presentation of the methodology for applying ontologies and the semantic model to tax and customs legislation (evidence 20). The subsystem is accompanied by all appropriate documentation (user manuals as listed above, evidence 17-20 above). It was approved and accepted by the Acceptance Committee of the IAPR under protocol number: 1037081/1.4.2025 (evidence 21).

Finally, the Commission services accessed the link provided by the authorities on 29 August 2025 to verify that it is functional. This check was completed successfully, confirming that the link redirects the user to the home page of the dedicated website for informing taxpayers and provides several options for searching for primary and secondary tax and customs legislation. This link interfaces with the content management system.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 212 - Enhanced Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) Framework

**Related Measure:** 4.2 16702 Enhancing the AML/CFT Framework

**Qualitative Indicators:** Platform for the collection of statistical data launched; improvements in beneficial ownership special registry completed

**Time:** Q2 2024

### 1. Context:

The reform concerns the set-up of a digital platform for the collection of statistical data held by judicial, supervisory and law enforcement authorities, and the improvement of the Central Register of Beneficial Owners to facilitate the direct access of the competent authorities to beneficial ownership information.

Milestone 212 requires the (i) Launch of the platform for the collection of statistical data held by national competent authorities (i.e. judicial, supervisory and law enforcement); the (ii) Improvement of the Central Register of Beneficial Owners to facilitate the direct access of the competent authorities to such information; and the (iii) Interconnection of the Central Register of Beneficial Owners with the respective registers of EU Member States through the relevant EU platform.

Milestone 212 is the only milestone of this reform, related to the launch of the platform for the collection of statistical data, and the improvement of the central register of beneficial owners. The reform has a final expected date for implementation of 30 June 2024.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                          | Short description                                                                                                                                                                                                                     |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled                                                                                        |                                                                                                                                                                                                                                       |
| 2 | Law No. 4557/2018, published in the Official Journal A 139/30.07.2018, 'Prevention and suppression of money laundering and terrorist financing (transposition of Directive 2015/849/EU) and other provisions' | Copy of Law No. 4557/2018 concerning the platform for the collection of statistical data, and the central register of beneficial owners                                                                                               |
| 3 | Request for proposals No. 33899 EE 2023/20.07.2023                                                                                                                                                            | Copy of request for proposals through international, electronic, and open competition for the provision of services for the establishment of a digital platform for statistical data                                                  |
| 4 | Contract No. 11/2024 between the Ministry of Digital Governance and the contracting entity 'Cosmos Business Systems A.E.B.E.', dated 11.04.2024                                                               | Copy of contract No. 11/2024 between the Ministry of Digital Governance and the contracting entity 'Cosmos Business Systems A.E.B.E.' for the provision of services for the establishment of a digital platform for statistical data. |
| 5 | Certificate of acceptance No. 3, dated 09.07.2024, Project Acceptance Committee, Ministry of Digital Governance                                                                                               | Copy of certificate of acceptance for Phase 1 of the platform for the collection of statistical data: Implementation Study                                                                                                            |

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| 6  | Certificate of acceptance No. 7, dated 19.12.2024, Project Acceptance Committee, Ministry of Digital Governance                                                                                                                                                                                                                                                                                                                                                                                                                    | Copy of certificate of acceptance for Phase 2 of the platform for the collection of statistical data: Development, installation and configuration of digital platform software                                                                                         |
| 7  | Certificate of acceptance No. 11, dated 06.03.2025, Project Acceptance Committee, Ministry of Digital Governance                                                                                                                                                                                                                                                                                                                                                                                                                   | Copy of certificate of acceptance for Phase 3 of the platform for the collection of statistical data: Pilot operation and training of digital platform users and administrators                                                                                        |
| 8  | Certificate of acceptance No. 12, dated 20.03.2025, Project Acceptance Committee, Ministry of Digital Governance                                                                                                                                                                                                                                                                                                                                                                                                                   | Copy of certificate of acceptance for Phase 4 of the platform for the collection of statistical data: Production operation                                                                                                                                             |
| 9  | Administrative Act 108154 ΕΞ 2025 dated 20.06.2025 of the Secretary General for Economic Policy and Strategy of the Ministry of Economy and Finance, and the Secretary General for Information Systems and Digital Governance of the Ministry of Digital Governance                                                                                                                                                                                                                                                                | Copy of Administrative Act for the commencement of the productive operation of the platform for the collection of statistical data (Article 32 of Law No. 4557/2018)                                                                                                   |
| 10 | A link to the webpage for the platform for the collection of statistical data is available: <a href="https://aml-stats.apps.gov.gr/">https://aml-stats.apps.gov.gr/</a>                                                                                                                                                                                                                                                                                                                                                            | -                                                                                                                                                                                                                                                                      |
| 11 | Decision 125209 ΕΞ 2022 of the Minister of Economy and the Minister of State, Official Journal B 4750/08.09.2022, 'Regulation of specific matters relating to access to the Central Register of Beneficial Owners referred to in Articles 20 and 21 of Law 4557/2018'                                                                                                                                                                                                                                                              | Copy of Decision regarding specific matters relating to access to the central register of beneficial owners                                                                                                                                                            |
| 12 | A link to the webpage of the central register of beneficial owners is available: <a href="https://www.gsis.gr/polites-epiheiriseis/epiheiriseis/mitroo-pragmatikon-dikaioyhon">https://www.gsis.gr/polites-epiheiriseis/epiheiriseis/mitroo-pragmatikon-dikaioyhon</a>                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                        |
| 13 | A link to the webpage of the Beneficial Ownership Registers Interconnection System (BORIS) is available: <a href="https://e-justice.europa.eu/topics/registers-business-insolvency-land/beneficial-ownership-registers-interconnection-system-boris_en?EUROPEAN_UNION=&amp;action=maximize&amp;idSubpage=1&amp;member=1">https://e-justice.europa.eu/topics/registers-business-insolvency-land/beneficial-ownership-registers-interconnection-system-boris_en?EUROPEAN_UNION=&amp;action=maximize&amp;idSubpage=1&amp;member=1</a> |                                                                                                                                                                                                                                                                        |
| 14 | Beneficial Ownership Registers Interconnection System (BORIS) status report by EC DIGIT, 16 November 2023                                                                                                                                                                                                                                                                                                                                                                                                                          | Copy of Beneficial Ownership Registers Interconnection System (BORIS) status report by EC DIGIT                                                                                                                                                                        |
| 15 | Commission Implementing Regulation (EU) 2021/369 of 1 March 2021                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Copy of Commission Implementing Regulation (EU) 2021/369 establishing the technical specifications and procedures required for the system of interconnection of central registers referred to in Directive (EU) 2015/849 of the European Parliament and of the Council |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Launch of the platform for the collection of statistical data held by national competent authorities (i.e. judicial, supervisory and law enforcement).** Furthermore, in line with the description of the measure, **the measure involves setting up a digital platform for the collection of statistical data held by judicial, supervisory and law enforcement authorities.**

Article 32 of Law No. 4557/2018 (evidence 2, entered into force with its publication in the Official Journal) provides for the collection, maintenance and processing of statistical data by public authorities. Specifically, paragraph 1 of that Article indicates that the public authorities involved concern: (i) judicial, such as: the Ministry of Justice (in its capacity as judicial authority); (ii) supervisory, such as: the Bank of Greece, the Hellenic Capital Market Commission, the Hellenic Police (in its capacity as supervisory authority), the Hellenic Accounting and Auditing Standards Oversight Board, the Independent Authority for Public Revenue, the Hellenic Gaming Commission, and the Ministry of Justice (in its capacity as supervisory authority); and (iii) law enforcement, such as the Hellenic Police (in its capacity as law enforcement authority), the Hellenic Coast Guard, the General Directorate for Financial and Economic Crime Unit, and the General Directorate of Customs.

In this respect, Greece submitted the following documentary evidence that demonstrate the launch of the platform for the collection of statistical data held by the aforementioned competent authorities.

- The request for proposals (evidence 3) and the contract signed between the Ministry of Digital Governance and the contracting entity (evidence 4) for the establishment of a digital platform for the recording of statistics required to be kept at national level in accordance with the provisions on preventing and combating money laundering and the financing of terrorism and its predicate offences.
- Certificate of acceptance for Phase 1 of the platform for the collection of statistical data: Implementation Study (evidence 5).
- Certificate of acceptance for Phase 2 of the platform for the collection of statistical data: Development, installation and configuration of digital platform software (evidence 6).
- Certificate of acceptance for Phase 3 of the platform for the collection of statistical data: Pilot operation and training of digital platform users and administrators (evidence 7).
- Certificate of acceptance for Phase 4 of the platform for the collection of statistical data: Production operation (evidence 8), including the final acceptance of the contract for the launch of the platform for the collection of statistical data.
- Administrative Act of the Secretary General for Economic Policy and Strategy of the Ministry of Economy and Finance, and the Secretary General for Information Systems and Digital Governance of the Ministry of Digital Governance (evidence 9) indicating the launch of the platform for the collection of statistical data as per the provisions of Article 32 of Law No. 4557/2018.

As regards the collection of statistical data, through the platform, the authorities can register as users and, upon receiving the relevant electronic notification, they can enter and use the database within their jurisdiction. Greece provided the link where the platform can be accessed (evidence 10).

The Commission services conducted an on-the-spot check on 24 June 2025 to verify the launch of the platform for the collection of statistical data. This check was completed successfully, confirming that the aforementioned requirement is satisfactorily fulfilled.

**Improvement of the central register of beneficial owners to facilitate the direct access of the competent authorities to such information.** Furthermore, in line with the description of the measure,

**the measure concerns the improvement of the Central Register of Beneficial Owners to facilitate the direct access of the competent authorities to beneficial ownership information.**

Article 20 of Law No. 4557/2018 (evidence 2, entered into force with its publication in the Official Journal) provides for the requirements concerning the Central Register of Beneficial Owners. Paragraph 1 of that Article indicates that corporate and other entities established in Greece are required to collect and keep, in a dedicated register, adequate, accurate and up-to-date information on their beneficial owners. Paragraph 3 of that Article indicates that such entities shall provide the information on both their legal and beneficial ownership to the competent authorities.

Decision 125209 ΕΕ 2022 of the Minister of Economy and the Minister of State (evidence 11), introduces the procedure, terms and conditions that facilitate access of such authorities to the register's data. Article 4 of that Decision specifies that the competent authorities have direct access - without any restriction and without prior notification of the entity concerned - to exercise their duties in preventing and combating money laundering, the predicate offences and terrorism financing. Greece provided the link where the central register of beneficial owners can be accessed (evidence 12).

As regards improvements of the register, these concern, for example:

- definition of the scope of access rights per user category;
- specification of the access procedure, applicable fees, and the process for logging and maintaining search data;
- provision for the right of notification to data subjects;
- access exclusively through the national tax system, ensuring user identification;
- safeguards to prevent misuse, such as mandatory justification for each access request and the recording and retention of search data for a defined period.

The Commission services conducted an on-the-spot check on 24 June 2025 to verify that the Central Register of Beneficial Owners facilitates the direct access of the competent authorities to such information. This check was completed successfully, confirming that the aforementioned requirement is satisfactorily fulfilled.

**Interconnection of the Central Register of Beneficial Owners with the respective registers of EU Member States through the relevant EU platform.**

As regards the interconnection of the register with the respective registers of EU Member States through the relevant EU platform, this is demonstrated through the official web page of the Beneficial Ownership Register Interconnection System (hereinafter referred to as "BORIS"). This webpage contains links and access to webpages of registers of EU Member States with information on the beneficial owners of companies and other legal entities, trusts and other types of legal arrangements. Greece provided the link where the BORIS can be accessed (evidence 13). In this link, Greece appears as one of the Member States for which information on beneficial owners is available and can be accessed by competent authorities. Greece also provided a status report on the BORIS, including an 'Interconnection Status' part, where Greece appears among the countries for which the integration testing is done and the connection to the system's production environment is achieved (dated 16 November 2023, evidence 14). The Commission Implementing Regulation (EU) 2021/369 establishes the technical specifications and procedures required for the system of interconnection of central registers (evidence 15).

The Commission services conducted an on-the-spot check on 24 June 2025 to verify the interconnection of the central register of beneficial owners with the respective registers of EU Member States through the relevant EU platform. This check was completed successfully, confirming that the aforementioned requirement is satisfactorily fulfilled.

**4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 216 Professionalisation of Public Procurement domain - new legislation

**Related Measure:** 4.2.16711 Professionalization of Public Procurement domain

**Qualitative Indicator:** New legislation entered into force; in-depth study completed

**Time:** Q2 2024

### 1. Context:

The reform aims to improve the public procurement framework in Greece. It consists of the implementation of the national strategy on public procurement 2021-2025, training and professional development of procurement staff, and study on the reorganisation of structures and responsibilities of the General Directorate for Public Procurement of the Ministry of Development competent for carrying out centralised procurement procedures at national level.

The milestone consists of entry into force of new legislation related to professional development of and incentives for procurement staff, and the completion of the study to re-organize the structure and the responsibilities of the General Directorate for Public Procurement of the Ministry of Development competent for carrying out centralised procurement procedures at national level.

Milestone 216 is the second milestone of the reform, and it follows the completion of milestone 216a. It will be followed by milestone 218 and target 221, related, respectively, to the implementation of the national strategy on public procurement 2021-2025, and completion of upskilling / reskilling programs for public procurement. The reform has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Short description                                                                                                        |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                          |
| 2 | Law no. 5218/2025 of 14 July 2025 on "Overhaul of the framework for professional training of employees dealing with more than one contract, the framework for preparatory training and the award of public contracts and legal protection in the field of public contracts, the national quality framework and the framework for the establishment, extension and modernisation of manufacturing activities in the Region of Attica and other provisions." (Official Journal A' 125/14.07.2025). It entered into force on its publication date in accordance with Article 80 paragraph 1, except for Article 7 which will enter into force on 1 January 2026 in accordance with Article 80, paragraph 3. | Law on the professionalization of public procurement domain                                                              |
| 3 | Joint Ministerial Decision no. 72065 of 19 September 2024, published on 26 September 2024 in Official Journal B' 5389/26.09.2024. It entered into force on its publication date in accordance with Article 6 of the aforementioned JMD.                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Joint Ministerial Decision on the regulation of issues of training and certification of public procurement professionals |

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|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 | Study on reorganization of structures and responsibilities of the National Central Procurement Authority of July 2024 by Mikroulas & Staikouras Professional Lawyers                                                                                                                                                                 | In-depth study on reorganization of the structure and the responsibilities of the General Directorate for Public Procurement of the Ministry of Development competent for carrying out centralised procurement procedures at national level |
| 5 | Decision no. 64557 of 19 August 2024 by the Ministry of Development on the Approval of the contractor company, the legal adviser of TAIPED, for the implementation of Subproject 3 'Study on the reorganization of structures and responsibilities of the General Directorate for Public Procurement of the Ministry of Development' | Decision by the Ministry of Development accepting the in-depth study.                                                                                                                                                                       |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Entry into force of new legislation providing for professional work streams for staff dealing with public procurement, specific skills' groups and the adoption of financial and non-financial incentives in full consistency with the unified wage grid (Law 4354/2015) without setting any exemption. Adoption of financial and non-financial incentives may have a delayed entry into force.** Furthermore, in line with the description of the measure, **the incentive scheme shall be in full consistency with the unified wage grid (Law 4354/2015) without setting any exemption.**

Law no. 5218/2025 (evidence 2) sets out provisions for professional training and certification of staff who deal with public procurement. Specifically, Articles 1-8 as well as the Articles 33 and 34 deal with the professionalization of public procurement domain. Article 7 deals with the adoption of financial (paragraph 1 clause a') and non-financial incentives (paragraph 1 clauses b, c and d, and paragraph 2) in full consistency with the unified wage grid (Law 4354/2015) without setting any exemption. More specifically, financial incentives include an additional monthly remuneration of 50% of the upper limit of paragraph 5 of Art 21 of Law 4354/2015 for certified staff. The non-financial incentives include an advanced introductory rank (rank B') for public procurement professionals, priority regarding the staffing of managerial positions linked to public procurement, enhanced interministerial mobility options for public procurement officials insofar these officials continue to staff public procurement services, and more options regarding teleworking. The law entered into force on its publication date in accordance with Article 80 paragraph 1, except for Article 7 which will enter into force on 1 January 2026 in accordance with Article 80, paragraph 3.

**Completion of the in-depth study to re-organize the structure and the responsibilities of the General Directorate for Public Procurement of the Ministry of Development competent for carrying out centralised procurement procedures at national level.** Furthermore, in line with the description of the measure, **and the completion of an in-depth study on the reorganisation of structures and responsibilities of the General Directorate for Public Procurement of the Ministry of Development competent for carrying out centralised procurement procedures at national level.**

The study on reorganization of structures and responsibilities of the National Central Purchasing Authority of July 2024 (evidence 4) provides an in-depth analysis of the current structure, responsibilities, mode of operation, effectiveness, strengths and weaknesses of the General Directorate

for Public Procurement of the Ministry of Development, as well as its interaction with other contracting authorities/bodies (National Central Health Procurement Authority (EKAPY) and Secretariat-General for Infrastructure). Furthermore, the study includes examples of and makes comparisons with other Central Purchasing Authorities from Austria, Italy, Portugal, and Ireland. Finally, it proposes how best to restructure and redefine objectives and priorities of the General Directorate for Public Procurement of the Ministry of Development. Specifically, it provides a detailed proposal for the establishment of a Special Public Procurement Unit, followed by another proposal for its (possible) future evolution into a state-controlled private legal entity. The study was accepted by the General Secretariat for Commerce of the Ministry of Development through a decision no. 64557 of 19 August 2024 (evidence 5).

Furthermore, in line with the description of the measure, **this shall be further supported by (...) the adoption of certification procedures for these professionals; the creation of distinct professional work streams and adoption of an incentive package, qualifications / career path for such staff.**

Article 5 of Law no. 5218/2025 (evidence 2) provides a detailed certification procedure for public procurement professionals who will opt to achieve certification. The certification will be performed according to the provisions of the Joint Ministerial Decision (evidence 3) which regulates the issues of training and certification of public procurement professionals.

Law no. 5218/2025 (evidence 2) makes the relevant provisions. Specifically, Article 4 provides for the adoption of a new registry for public procurement professionals, which is further subdivided in two separate workstreams – one for public procurement professionals specialised in the procurement of goods and services and the other for public procurement professionals specialised in the procurement of public works. Article 8 provides for the formation of a new training regime, as regards training of new employees as skilled public procurement professionals, through the National School of Public Administration and Local Administration.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 234 Justice Police Operational

**Related Measure:** 4,3.16575 Accelerating the administration of justice

**Qualitative Indicator:** Judicial police fully operational and functional both at central and regional level

**Time:** Q2 2024

### 1. Context:

Milestone 234 is part of measure 16575, whose objective is to accelerate the administration of justice and enhance its efficiency and effectiveness, in order to contribute to the economic and institutional transformation of Greece. To this end, the measure comprises several elements, ranging from a revision of the judicial map across Greece (covering all branches of the judiciary, administrative, civil and penal), to the creation of a judicial police, the adoption of an array of procedural and training measures and the introduction of a judicial performance tool for the provision of financial incentives to judicial clerks.

Milestone 234 concerns the second of the above-listed elements, namely the creation of a judicial police to support and enhance the functioning of Justice by means of contributing know-how to the investigation of complex crime and providing a wide array of services of judicial assistance, and requires its operationalisation in all its competences, both at central administration level and at regional level within the courts.

Milestone 234 is the sixth milestone of the reform and the second and last step concerning the judicial police. It follows the completion of milestone 223, on the award of a tender for technical support for the development of the judicial clerks' performance tool, milestone 225, on the entry into force of legislation for the judicial police, milestone 226, on the entry into force of legislation for the revision of the administrative judicial map, milestone 230, on the entry into force of legislation for the judicial clerks' performance tool and milestone 232, on the entry into force of legislation for the revision of the civil and penal judicial map. It will be followed by milestone 236, on the operationalisation of all entities affected by the reform of the judicial map (civil, penal and administrative) and milestone 238, related to the completion of training on mediation to legal professionals and/or mediators and the entry into operation of a unified digital system for mediation centres. The reform has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                        | Short description                                          |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                              |                                                            |
| 2 | Law No. 4963/2022, published in the Official Journal, Section A, No. 149/30 July 2022, styled "Judicial police and various urgent arrangements for the ministry of justice"                                                                                 | Primary legislation on the creation of the judicial police |
| 3 | Law No. 5049/2023, published in the Official Journal, Section A, No. 152/14 September 2023, styled "Acceleration of judicial police staffing and operation procedures - Amendment of law 4963/2022 - Other urgent arrangements for the ministry of justice" | Primary legislation amending evidence 2 (Articles 1-21)    |

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| 4 | Law No. 5108/2024, published in the Official Journal, Section A, No. 65/2 May 2024, styled “Restructuring of the courts of first instance and modernization of the spatial planning of the judicial formations of the country”                                                                                                                                                                                                                                            | Primary legislation amending evidence 2 (Articles 40-42)             |
| 5 | Law No. 5134/2024, published in the Official Journal, Section A, No. 146/11 September 2024, styled “Interventions in the code of civil Procedure, in the code of organization of courts and the status of judicial officers and in the code of criminal procedure in alignment with the consolidation of the first degree of jurisdiction with Law 5108/2024 - Provisions for the judicial police and other emergency regulations”                                        | Primary legislation amending evidence 2 (Articles 94-103)            |
| 6 | Law No. 5172/2025, published in the Official Journal, Section A, No. 10/29 January 2025, styled “Addressing new forms of violence against women – Incorporation of Directive (EU) 2024/1385 – Additional arrangements regarding domestic violence - Restructuring of the forensic services - Enhancing the operation of Eurojust - Protective measures of minors and combatting criminality – Procedural provisions for the administrative courts and other arrangements” | Primary legislation amending evidence 2 (Article 63)                 |
| 7 | Law No. 5197/2025, published in the Official Journal, Section A, No. 76/16 May 2025, styled “Interventions in the legislative framework of the national school of judges, in the code of organization of courts and the status of judicial officers and in the code of notaries and other provisions”                                                                                                                                                                     | Primary legislation amending evidence 2 (Articles 52-53)             |
| 8 | Law No. 5221/2025, published in the Official Journal, Section A, No. 133/28 July 2025, styled “Interventions in the code of civil Procedure - Amendments regarding the publication of wills - Amendments to the regulatory framework of objections to enforcement with the aim of accelerating the trial - other provisions within the competence of the ministry of justice”                                                                                             | Primary legislation amending evidence 2 (Article 160)                |
| 9 | Presidential Decree 30/2025, published in the Official Journal, Section A, No.                                                                                                                                                                                                                                                                                                                                                                                            | Secondary legislation regarding the organisation and function of the |

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|    | 52/09 April 2025, styled “Organigram of the ministry of justice”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | judicial police, the definition of the competences of its civil and police branches and the territorial distribution of its regional services (Article 42) |
| 10 | Presidential Decree 31/2023, published in the Official Journal, Section A, No. 63/15 March 2023, styled “Uniforms, weaponry and personal equipment of the staff of the police sector of the judicial police”                                                                                                                                                                                                                                                                                                                                                                                           | Secondary legislation setting the standards and specifications of the uniforms and equipment of the judicial police                                        |
| 11 | Joint Ministerial Decision of the vice-minister of national economy and finance and the minister of justice, 2317/2025, published in the Official Journal, Section B, No. 2634/28 May 2025, styled “Determination of the method of conducting training seminars for the staff of the civil sector of the judicial police, the content, duration, and completion time, the qualifications and selection method of the trainers, the manner of establishing a working group from the staff of the National School of Judicial Officers to support the seminars, as well as other organizational matters. | Secondary legislation regarding the provision of training to the civil section personnel of the judicial police                                            |
| 12 | Report signed by the head of the general directorate of human resources of the ministry of justice, dated 01 August 2025, under protocol No. 43947                                                                                                                                                                                                                                                                                                                                                                                                                                                     | History log of the staffing of civil sector posts of the judicial police                                                                                   |
| 13 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 145997/13 March 2025, published in the Official Journal, Section C, No. 1230/01 April 2025                                                                                                                                                                                                                                                                                                                                                                                     | Decision for the appointment of 79 PE (University Education) civil sector employees of the judicial police                                                 |
| 14 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 44311oik/05 August 2024, published in the Official Journal, Section C, No. 2458/20 August 2024                                                                                                                                                                                                                                                                                                                                                                                 | Decision for the appointment of 2 TE (Technical Education) civil sector employees of the judicial police                                                   |
| 15 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 58488oik/17 September 2024, published in the Official Journal, Section C, No. 3078/26 September 2024                                                                                                                                                                                                                                                                                                                                                                           | Decision for the appointment of 20 TE (Technological Education) civil sector employees of the judicial police                                              |

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| 16 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 5615/30 April 2024, published in the Official Journal, Section C, No. 3261/09 October 2024   | Correction of the table set out in evidence 15, by means of the addition of a column on the specialisation of the civil sector employees of the judicial police                                                                                                  |
| 17 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 2394oik/25 April 2024, published in the Official Journal, Section C, No. 1269/25 April 2024  | Decision for the appointment of 70 TE (Technological Education) police sector employees of the judicial police                                                                                                                                                   |
| 18 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 23942oik/26 April 2024, published in the Official Journal, Section C, No. 1285/26 April 2024 | Decision for the appointment of 21 PE (University Education) and 20 (Secondary Education) police sector employees of the judicial police                                                                                                                         |
| 19 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 2772oik/26 April 2024, published in the Official Journal, Section C, No. 1286/28 April 2024  | Decision for the appointment of 7 PE (University Education) and 316 (Secondary Education) police sector employees of the judicial police                                                                                                                         |
| 20 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 5615/30 April 2024, published in the Official Journal, Section C, No. 1333/01 May 2024       | Decision for the appointment of 29 DE (Secondary Education) police sector employees of the judicial police                                                                                                                                                       |
| 21 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 33013oik/30 April 2024, published in the Official Journal, Section C, No. 1358/02 May 2024   | Decision for the appointment of 4 DE (Secondary Education) police sector employees of the judicial police                                                                                                                                                        |
| 22 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 32344oik/29 May 2024, published in the Official Journal, Section C, No. 1597/03 June 2024    | Decision for the appointment of 10 DE (Secondary Education) police sector employees of the judicial police.                                                                                                                                                      |
| 23 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 32364oik/14 June 2024, published in the Official Journal, Section C, No. 1748/14 June 2024   | Decision for the appointment of 51 DE (Secondary Education) police sector employees of the judicial police in replacement of an equal number of formerly appointed employees who had not accepted their appointment or were found to be unqualified or resigned. |

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| 24 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 40637oik/13 June 2024, published in the Official Journal, Section C, No. 1749/14 June 2024                                                                                                                                               | Decision for the appointment of 4 DE (University Education) and 4 (Technological Education) police sector employees of the judicial police                                                                                                                                           |
| 25 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 43896oik/04 July 2024, published in the Official Journal, Section C, No. 1974/04 July 2024                                                                                                                                               | Decision for the appointment of 10 DE (Secondary Education) police sector employees of the judicial police and of 1 TE (Technological Education) police sector employee of the judicial police in replacement of a formerly appointed employee who had not accepted his appointment. |
| 26 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 2771oik/26 April 2024, published in the Official Journal, Section C, No. 4273/31 December 2024                                                                                                                                           | Decision for the appointment of 20 DE (Secondary Education) police sector employees of the judicial police                                                                                                                                                                           |
| 27 | Decision of the Head of the general directorate of administrative and financial services of the ministry of justice No. 23005/23 April 2024, published in the Official Journal, Section C, No. 1601/28 April 2025                                                                                                                                                | Appointment of 12 DE (Secondary Education) police sector employees of the judicial police                                                                                                                                                                                            |
| 28 | Ministerial Decision of the Minister of Justice No. 60786oik/17 September 2024, published in the Official Journal, Section C, No. 3083/26 September 2024                                                                                                                                                                                                         | Decision for the appointment of the Head of the directorate of the judicial police at the Ministry of Justice                                                                                                                                                                        |
| 29 | Certificate issued by the head of the directorate of the judicial police of the Ministry of Justice, dated 04 June 2025, under protocol No. 32220                                                                                                                                                                                                                | Certificate, with eleven attachments mentioned therein, attesting the formation of the police and civil section of the central service of the judicial police at the Ministry of Justice and the number of its personnel                                                             |
| 30 | Decision of the Staff Secretary of the Department of Management of Human Resources of the directorate of Human Resources and Organisation of the General directorate of Financial and Administrative Services of the Ministry of Justice, under Protocol No. 2935, dated 17 January 2025, digitally signed and bearing the Internet Upload No. ("ADA") 9ΛΞΣΩ-Δ4K | Decision for the appointment of the heads of department of the organic units of the central and regional services of the police sector of the judicial police                                                                                                                        |
| 31 | Certificate issued by the head of the prosecutor's office of the supreme court, dated 54 May 2025, under protocol No. 3277                                                                                                                                                                                                                                       | Certificate attesting the formation of the police section of the regional service of the judicial police at the                                                                                                                                                                      |

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|    |                                                                                                                                                                                                         | supreme court and the number of its personnel.                                                                                                                                    |
| 32 | Certificate issued by the alternate head of the directorate of the secretariat of the council of state, acting on behalf of the president of the court, dated 07 May 2025, under protocol No. 1224/2025 | Certificate attesting the formation of the police section of the regional service of the judicial police at the council of state and the number of its personnel.                 |
| 33 | Certificate issued by the general administration coordinator of the Court of Audit, dated 20 May 2025                                                                                                   | Certificate attesting the formation of the police section of the regional service of the judicial police at the court of audit and the number of its personnel.                   |
| 34 | Certificate issued by the Head of general commissioner's office for the administrative courts, dated 06 May 2025, under protocol No. 1875                                                               | Certificate attesting the formation of the police section of the regional service of the judicial police at the general commissioner's office and the number of its personnel.    |
| 35 | Document issued by the Head of general commissioner's office for the administrative courts, dated 16 July 2025, under protocol No. 3312                                                                 | Document informing of the territorial distribution of the police section staff appointed at the general commissioner's office.                                                    |
| 36 | Certificate issued by the head of the prosecutor's office of the Athens court of appeal, dated 06 May 2025, under protocol No. 7515                                                                     | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 37 | Certificate issued by the head of the prosecutor's office of the Athens court of appeal, dated 01 August 2025, under protocol No. 7515a                                                                 | Certificate complementing evidence 36 regarding the civil police personnel                                                                                                        |
| 38 | Certificate issued by the head of the prosecutor's office of the Aegean court of appeal, dated 04 July 2025, under protocol No. 2105                                                                    | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 39 | Certificate issued by the head of the prosecutor's office of the North Aegean court of appeal, dated 07 May 2025, under protocol No. 584                                                                | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 40 | Certificate issued by the head of the prosecutor's office of the Western Mainland Greece court of appeal, dated 08 May 2025, under protocol No. 936                                                     | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 41 | Certificate issued by the head of the prosecutor's office of the Dodecanese court of appeal, dated 13 May 2025, under protocol No. 2135                                                                 | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |

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| 42 | Certificate issued by the head of the prosecutor's office of the Piraeus court of appeal, dated 10 July 2025, under protocol No. 1393      | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 43 | Certificate issued by the head of the prosecutor's office of the Piraeus court of appeal, dated 30 July 2025, under protocol No. 1541      | Certificate complementing evidence 42 regarding the civil police personnel                                                                                                        |
| 44 | Certificate issued by the head of the prosecutor's office of the Euvoia court of appeal, dated 02 May 2025, under protocol No. 1406        | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 45 | Certificate issued by the head of the prosecutor's office of the Thessaloniki court of appeal, dated 19 May 2025, under protocol No. 4234  | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 46 | Certificate issued by the head of the prosecutor's office of the Thrace court of appeal, dated 02 May 2025, under protocol No. 1680        | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 47 | Certificate issued by the head of the prosecutor's office of the Ioannina court of appeal, dated 30 April 2025                             | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 48 | Certificate issued by the head of the prosecutor's office of the Kalamata court of appeal, dated 05 May 2025, under protocol No. 670       | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 49 | Certificate issued by the head of the prosecutor's office of the Creta court of appeal, dated 30 April 2025, under protocol No. 2208       | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 50 | Certificate issued by the head of the prosecutor's office of the Eastern Creta court of appeal, dated 02 May 2025, under protocol No. 2790 | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 51 | Certificate issued by the head of the prosecutor's office of the Corfu court of appeal, dated 02 May 2025, under protocol No. 922          | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 52 | Certificate issued by the head of the prosecutor's office of the Lamia court of                                                            | Certificate attesting the formation of the civil and the police section of the                                                                                                    |

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|    | appeal, dated 14 May 2025, under protocol No. 284                                                                                                         | regional service of the judicial police at the court and the number of their respective personnel.                                                                                |
| 53 | Certificate issued by the head of the prosecutor's office of the Larissa court of appeal, dated 02 May 2025, under protocol No. 466                       | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 54 | Certificate issued by the head of the prosecutor's office of the Western Macedonia court of appeal, dated 08 May 2025, under protocol No. 870             | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 55 | Certificate issued by the head of the prosecutor's office of the Nauplion court of appeal, dated 30 April 2025, under protocol No. 2609                   | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 56 | Certificate issued by the head of the prosecutor's office of the Patras court of appeal, dated 10 July 2025, under protocol No. 1793                      | Certificate attesting the formation of the civil and the police section of the regional service of the judicial police at the court and the number of their respective personnel. |
| 57 | Certificate issued by the head of the prosecutor's office of the Athens court of first instance, dated 02 May 2025                                        | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel.                            |
| 58 | Certificate issued by the head of the prosecutor's office of the Agrinion court of first instance, dated 30 April 2025, under protocol No. 2126           | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel.                            |
| 59 | Certificate issued by the head of the prosecutor's office of the Messolonghi court of first instance, dated 30 June 2025, under protocol No. 2005         | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel.                            |
| 60 | Certificate issued by the head of the prosecutor's office of the Alexandroupolis court of first instance, dated 02 May 2025, under protocol No. 1130/2025 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel.                            |
| 61 | Certificate issued by the head of the prosecutor's office of the Arta court of first instance, dated 02 May 2025, under protocol No. 3539                 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel.                            |
| 62 | Certificate issued by the head of the prosecutor's office of the Patras court                                                                             | Certificate attesting the formation of the police section of the regional service of the judicial police at the                                                                   |

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|    | of first instance, dated 16 May 2025, under protocol No. 3408                                                                                    | court and the number of its personnel.                                                                                                                 |
| 63 | Certificate issued by the head of the prosecutor's office of the Aighion court of first instance, dated 13 May 2025, under protocol No. 1059     | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 64 | Certificate issued by the head of the prosecutor's office of the Kalavryta court of first instance, dated 30 April 2025, under protocol No. 303  | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 65 | Certificate issued by the head of the prosecutor's office of the Veroia court of first instance, dated 05 May 2025, under protocol No. 476       | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 66 | Certificate issued by the head of the prosecutor's office of the Livadeia court of first instance, dated 06 May 2025, under protocol No. 1       | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 67 | Certificate issued by the head of the prosecutor's office of the Voiotia court of first instance, dated 02 May 2025, under protocol No. 908      | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 68 | Certificate issued by the head of the prosecutor's office of the Volos court of first instance, dated 16 May 2025, under protocol No. 1088/2025  | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 69 | Certificate issued by the head of the prosecutor's office of the Ghiannitsa court of first instance, dated 30 April 2025, under protocol No. 469 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 70 | Certificate issued by the head of the prosecutor's office of the Grevena court of first instance, dated 22 May 2025, under protocol No. 217/2025 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 71 | Certificate issued by the head of the prosecutor's office of the Drama court of first instance, dated 07 May 2025, under protocol No. 15 B       | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 72 | Certificate issued by the head of the prosecutor's office of the Edessa court of first instance, dated 30 April 2025, under protocol No. 571     | Certificate attesting the formation of the police section of the regional service of the judicial police at the                                        |

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|    |                                                                                                                                                   | court and the number of its personnel.                                                                                                                 |
| 73 | Certificate issued by the head of the prosecutor's office of the Evrytania court of first instance, dated 06 May 2025, under protocol No. 376     | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 74 | Certificate issued by the head of the prosecutor's office of the Zakynthos court of first instance, dated 07 May 2025, under protocol No. 931     | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 75 | Certificate issued by the head of the prosecutor's office of the Pyrgos court of first instance, dated 30 April 2025, under protocol No. 1746     | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 76 | Certificate issued by the head of the prosecutor's office of the Amaliada court of first instance, dated 30 April 2025, under protocol No. 773    | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 77 | Certificate issued by the head of the prosecutor's office of the Herakleion court of first instance, dated 30 April 2025, under protocol No. 2892 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 78 | Certificate issued by the head of the prosecutor's office of the Thesprotia court of first instance, dated 05 May 2025, under protocol No. 2139   | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 79 | Certificate issued by the head of the prosecutor's office of the Thessaloniki court of first instance, dated 07 May 2025, under protocol No. 2364 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 80 | Certificate issued by the head of the prosecutor's office of the Ioannina court of first instance, dated 05 May 2025, under protocol No. 1408     | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 81 | Certificate issued by the head of the prosecutor's office of the Kavala court of first instance, dated 30 April 2025, under protocol No. 762      | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 82 | Certificate issued by the head of the prosecutor's office of the Karditsa court of first instance, dated 30 April 2025, under protocol No. 881    | Certificate attesting the formation of the police section of the regional service of the judicial police at the                                        |

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|    |                                                                                                                                                          | court and the number of its personnel.                                                                                                                 |
| 83 | Certificate issued by the head of the prosecutor's office of the Kastoria court of first instance, dated 02 May 2025 under protocol No. 826a             | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 84 | Certificate issued by the head of the prosecutor's office of the Katerini court of first instance, dated 05 May 2025, under protocol No. 888             | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 85 | Certificate issued by the head of the prosecutor's office of the Corfu court of first instance, dated 05 May 2025, under protocol No. 440                | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 86 | Certificate issued by the head of the prosecutor's office of the Kefallinia court of first instance, dated 05 May 2025, under protocol No. 960           | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 87 | Certificate issued by the head of the prosecutor's office of the Kilikis court of first instance, dated 05 May 2025, under protocol No. 622              | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 88 | Certificate issued by the head of the prosecutor's office of the Kozani court of first instance, dated 30 April 2025, under protocol No. 621             | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 89 | Certificate issued by the head of the prosecutor's office of the Korinthos court of first instance, dated 15 May 2025, under protocol No. 20/15 May 2025 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 90 | Certificate issued by the head of the prosecutor's office of the Kos court of first instance, dated 07 July 2025, under protocol No. 2025                | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 91 | Certificate issued by the head of the prosecutor's office of the Sparta court of first instance, dated 30 April 2025, under protocol No. 575             | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 92 | Certificate issued by the head of the prosecutor's office of the Gytheion court of first instance, dated 02 May 2025, under protocol No. 303             | Certificate attesting the formation of the police section of the regional service of the judicial police at the                                        |

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|     |                                                                                                                                                         | court and the number of its personnel.                                                                                                                 |
| 93  | Certificate issued by the head of the prosecutor's office of the Lamia court of first instance, dated 04 July 2025, under protocol No. 1136             | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 94  | Certificate issued by the head of the prosecutor's office of the Larissa court of first instance, dated 07 May 2025, under protocol No. 1198            | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 95  | Certificate issued by the head of the prosecutor's office of the Lassithion court of first instance, dated 02 May 2025, under protocol No 1523.         | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 96  | Certificate issued by the head of the prosecutor's office of the Leukas court of first instance, dated 05 May 2025, under protocol No. 1294             | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 97  | Certificate issued by the head of the prosecutor's office of the Kalamata court of first instance, dated 05 May 2025, under protocol No. 14/02 May 2025 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 98  | Certificate issued by the head of the prosecutor's office of the Kyparissia court of first instance, dated 05 May 2025, under protocol No. 534          | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 99  | Certificate issued by the head of the prosecutor's office of the Mytilini court of first instance, dated 15 May 2025, under protocol No. 25             | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 100 | Certificate issued by the head of the prosecutor's office of the Naxos court of first instance, dated 30 April 2025, under protocol No. 1068            | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 101 | Certificate issued by the head of the prosecutor's office of the Nauplion court of first instance, dated 02 May 2025, under protocol No. 1712           | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 102 | Certificate issued by the head of the prosecutor's office of the Xanthi court of first instance, dated 30 April 2025, under protocol No. 385            | Certificate attesting the formation of the police section of the regional service of the judicial police at the                                        |

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|     |                                                                                                                                                | court and the number of its personnel.                                                                                                                 |
| 103 | Certificate issued by the head of the prosecutor's office of the Orestias court of first instance, dated 30 April 2025, under protocol No. 347 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 104 | Certificate issued by the head of the prosecutor's office of the Piraeus court of first instance, dated 30 April 2025, under protocol No. 2355 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 105 | Certificate issued by the head of the prosecutor's office of the Preveza court of first instance, dated 15 May 2025, under protocol No. 511    | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 106 | Certificate issued by the head of the prosecutor's office of the Rerthymni court of first instance, dated 05 May 2025, under protocol No. 1245 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 107 | Certificate issued by the head of the prosecutor's office of the Rodopi court of first instance, dated 05 May 2025, under protocol No. 544     | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 108 | Certificate issued by the head of the prosecutor's office of the Rodos court of first instance, dated 02 May 2025, under protocol No. 2303     | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 109 | Certificate issued by the head of the prosecutor's office of the Samos court of first instance, dated 20 May 2025, under protocol No. 711      | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 110 | Certificate issued by the head of the prosecutor's office of the Serrai court of first instance, dated 30 April 2025, under protocol No. 1082  | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 111 | Certificate issued by the head of the prosecutor's office of the Syros court of first instance, dated 15 May 2025, under protocol No. 1959     | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 112 | Certificate issued by the head of the prosecutor's office of the Trikala court of first instance, dated 02 May 2025, under protocol No. 2477   | Certificate attesting the formation of the police section of the regional service of the judicial police at the                                        |

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|     |                                                                                                                                                     | court and the number of its personnel.                                                                                                                 |
| 113 | Certificate issued by the head of the prosecutor's office of the Tripolis court of first instance, dated 06 May 2025, under protocol No. 4968       | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 114 | Certificate issued by the head of the prosecutor's office of the Florina court of first instance, dated 15 May 2025, under protocol No. 594         | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 115 | Certificate issued by the head of the prosecutor's office of the Chalkis court of first instance, dated 06 May 2025, under protocol No. 3910        | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 116 | Certificate issued by the head of the prosecutor's office of the Chalkidiki court of first instance, dated 15 May 2025, under protocol No. 520/2025 | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 117 | Certificate issued by the head of the prosecutor's office of the Chania court of first instance, dated 22 May 2025, under protocol No. 4128         | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 118 | Certificate issued by the head of the prosecutor's office of the Chios court of first instance, dated 06 May 2025, under protocol No. 507/2025      | Certificate attesting the formation of the police section of the regional service of the judicial police at the court and the number of its personnel. |
| 119 | Certificate issued by the head of the general financial directorate of the ministry of justice, dated 14 July 2025, under protocol No. 40335        | Confirmation of the due delivery of equipment for the police sector of the judicial police                                                             |
| 120 | Certificate issued by the General director of the National School of Judges, dated 04 July 2025, under protocol No. 5772                            | Confirmation of the completion of the training programme for the personnel of the civil sector of the judicial police                                  |
| 121 | Certificate issued by the director in charge of training of the police academy, dated 28 July 2025, under protocol No. 6502/2/71                    | Confirmation of the completion of the training programme for the personnel of the police sector of the judicial police                                 |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Operationalisation of the judicial police in all its competences, both at central administration level and at regional level within the courts.**

The Greek authorities provided a copy of Law No. 4963/2022, on the creation of the judicial police (evidence 2), alongside all subsequent amendments to it up to the adoption of evidence 8, as enacted by virtue of Laws 5049/2023 (evidence 3), 5108/2024 (evidence 4), 5134/2024 (evidence 5), 5172/2025 (evidence 6), 5197/2025 (evidence 7) and 5221/2025 (evidence 8). All references hereinafter to evidence 2 shall be understood as referring to its consolidated version currently in force, pursuant to these amendments.

Regarding the definition of competences, Article 4 of evidence 2 sets forth the competences of the judicial police at the central and the regional level, in both sections of the latter (civil and police), as follows:

- The central directorate is entrusted with drawing up the general guidelines and providing administrative and financial support to the regional services. These competences are further detailed by Article 42(5) of evidence 9.
- The civil regional services are entrusted, as per evidence 2, Article 4(2) point (a), with (i) carrying out preliminary examinations and investigations, (ii) providing scientific and technical assistance to judges and prosecutors on matters requiring specialised knowledge and (iii) assisting judicial and enforcement authorities in the execution of legal assistance requests.
- The police regional services are entrusted, as per evidence 2, Article 4(2) point (b), with (i) the service of procedural documents, (ii) the enforcement of judgments and warrants as well as the apprehension of perpetrators, (iii) the maintenance of order at court hearings and the guarding of court premises, (iv) carrying out preliminary examinations and investigations.

Regarding the territorial distribution of the judicial police:

- The central directorate is located at the ministry of justice in Athens, as per evidence 92, Article 16A(3), point (a) and 16A(4), point (a).
- The civil regional services are distributed across all civil and penal appellate courts of Greece, as per evidence 9, Article 42(3).
- The police regional services are distributed across all courts of Greece, that is the first instance and appellate civil and penal courts, the supreme court, the council of state and the court of audit, as per evidence 9, Article 42(4), with the sole exception of the regional service assigned to the first instance and appellate administrative courts (see below).
- Regarding specifically the first instance and appellate administrative courts, the corresponding police regional service is allocated centrally to the general commissioner's office for the administrative courts, located in Athens, as per evidence 9, Article 42(4) point (c).

Regarding the setting up of the judicial police, at central and regional level:

Evidence 2 provides for the creation and distribution of judicial police posts, at (i) central level [Article 16A(3) point (a) and (4) point (a)], (ii) regional level civil sector [Article 16A(1) and (3) point (b)] and (iii) regional level police sector (Article 16A(2) and (4) points (a1), (a2), (a3), (a4) and (b)). The above provisions also detail the number of staff affected to each respective entity, the level of education (secondary, technical or university) and the professional specialisation (administrative-financial, legal, IT, engineer, environmentalist, agronomist, forester).

Regarding the staffing of the judicial police:

The relevant provision of evidence 2 (Article 15) stipulates that the programming for the filling of vacant posts of the judicial police is to be conducted on a yearly basis. In accordance with above provisions, the Greek authorities had hired and appointed, by the date of submission of the request, (i) the head of the central directorate at the ministry of justice (evidence 29), (ii) 97 civil sector officials (evidence 12-16) and (iii) 494 police sector officials (evidence 17 to 28), distributed as follows:

- Eight police sector and two civil sector officials to the central directorate at the ministry of justice (evidence 30)
- Five police sector officials to the supreme court (evidence 31)
- Five police sector officials to the council of state (evidence 32)
- Five police sector officials to the court of audit (evidence 33)
- Nine police sector officials to the general commissioner's office for the administrative courts (evidence 34 and 35)
- 95 civil sector and 106 police sector officials to all 19 civil and penal courts of appeal (evidence 36 to 56)
- 356 police sector officials to all 63 civil and penal courts of first instance, that is 56 main seats and 7 parallel seats (evidence 57 to 118).

Moreover, the competent authority issued a decision (evidence 31) appointing the heads of department of the central and all regional services of the police sector of the judicial police.

Regarding the training of the judicial police personnel and the provision of the mandated equipment to the staff of the police section, the Greek authorities provided:

- A certificate issued by the general director of the national school of judges (evidence 121) attesting to the completion of the training of 97 officials of the civil section of the judicial police in compliance with the provisions of the relevant legislation (evidence 2, Article 33(1) and (1a), evidence 11),
- A certificate issued by the director of training at the police academy (evidence 122) attesting to the completion of the training of 494 officials of the police section of the judicial police in compliance with the provisions of the relevant legislation (evidence 2, Article 33(1), (2), (3)), and
- A certificate issued by the competent official of the ministry of justice (evidence 120) confirming the due delivery of the equipment for the police sector personnel of the judicial police in compliance with the provisions of the relevant legislation (evidence 10).

Following the completion of above-described actions, the central service and all regional services of the judicial police at the respective courts are duly constituted and operational, according to the express wording to that effect of the certificates issued by the heads or mandated officials of all formations of the judicial police, namely the head of the central directorate at the ministry of justice (evidence 30), the respective representatives of the supreme court (evidence 31), the council of state (evidence 32), the court of audit (evidence 33), the general commissioner for the administrative courts (evidence 34, 35), the heads of the prosecutor's office of the civil and penal courts of appeal (evidence 36 to 56) and the heads of the prosecutor's office of the civil and penal first instance courts (evidence 57 to 118).

Furthermore, in line with the description of the measure, **the creation of a judicial police to support and enhance the functioning of Justice, by contributing know-how to the investigation of complex crime (including financial crime, corruption and money laundering)**

The fulfilment of this requirement is mandated by Article 1(1) of evidence 2, which states that the purpose of Law 4963/2022 is the provision of assistance to the work of the judicial and prosecution services and the ensuring of the proper functioning of judicial services by entrusting tasks requiring specific scientific knowledge to the specialised personnel of the judicial police. According to Article 4 of evidence 2, said personnel is obliged to provide scientific and technical assistance, upon receiving the relevant mandate from judicial or prosecutorial authorities, on matters whose study and analysis require specialised knowledge, in the form of written reports on scientific or technical matters. The capacity of the judicial police to address the indicatively mentioned categories of financial crime, corruption and money laundering is established by the choice of professional specialties established by the relevant provisions of Law 4963/2022 (evidence 2, Article 16A(2), namely economists, jurists,

accountants and IT experts. Moreover, its Article 4(4) stipulates that other public authorities, in particular tax, audit and port authorities, as well as independent administrative authorities, shall provide assistance to the officials of the judicial police upon request.

Furthermore, in line with the description of the measure, **by providing a wide array of services of judicial assistance (assisting in the conduct of preliminary examinations and investigations, the enforcement of judgments and the service of documents and procedural acts, executing warrants, enforcing judgements, maintaining court order, assisting in the submittal of, or response to, requests for judicial assistance and carrying out mandates entrusted to it by the competent courts and public prosecutors).**

The provision of all these services is expressly stipulated in Article 4(2) of evidence 2.

The Council Implementing Decision required the operationalisation of the judicial police in all its competences, both at central administration level and at regional level within the courts. With regard to the police sector of the judicial police, the Greek authorities implemented this requirement at both levels, central and regional, with a total of 494 appointments of police sector officials. With regard to the civil sector of the judicial police at the regional level, the Greek authorities implemented the requirement, in six of the 19 courts concerned, namely the civil and penal courts of appeal of Eyvoia, Thessaloniki, Thrace, Kalamata, Eastern Creta and Lamia. In these courts, the appointments made covered all specialties as provided for each one of them by the relevant provision of Law 4963/2022 (evidence 2), namely Article 16A(3), points (b3), (b8), (b9), (b10), (b12) and (b15) respectively. Regarding the remaining thirteen civil and penal courts of appeal, the appointments made covered all specialties as provided by the relevant provision of Law 4963/2022 (evidence 2), namely Article 16A(3), points (b2), (b4), (b6), (b7), (b11), (b14), (b13), (b16), (b5), (b17), (b18), (b1) and (b18) respectively, except as follows: one specialty in Aegean, Northern Aegean, Western Central Greece, Dodecanese, Ioannina, Creta, Corfu, Larissa, Western Macedonia, Nauplion, Patras, three specialties in Athens and four specialties in Piraeus. These exceptions are identified by comparing the relevant individual court certificates as provided for in the relevant provisions of Law 4963/2022 (evidence 2), namely Article 16A(3), points (b2), (b4), (b6), (b7), (b11), (b14), (b13), (b16), (b5), (b17), (b18), (b1) and (b18) respectively. Finally, with regard to the civil sector of the judicial police at the central level, the appointments made covered all specialties but one, as provided by the relevant provision of evidence 2 (Article 16A(3) point (a)). The Greek authorities submitted an explanation for above vacancies in their history log of hires at the civil sector of the judicial police (evidence 12), stating that, in total, out of 150 posts that were initially advertised, (i) 13 positions were not filled from the beginning, as evidenced by the relevant successful candidates' lists and the allocation decisions of the Ministry of Interior, (ii) another 97 were filled and (iii) the ministry of justice has requested the staffing of the remaining 39 vacancies. Although the law sets the number of the civil branch posts to 170 (article 16A), it also stipulates that the programming for the staffing of vacant posts is conducted on annual basis, on proposal by the Minister of Justice (article 15). Thus, as the appointment process is dynamic, filling the remaining vacant posts can be addressed going forward. Whilst this lack of immediate appointments for the 39 vacant posts constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, evidence 2 provides (in Article 40) for a possibility to address any exceptional urgent service needs of a temporary character. In particular there is a possibility for a secondment of judicial police personnel, holding the requisite formal and substantive qualifications, to the jurisdictional area of another civil and penal court of appeal or to the central directorate of the judicial police. Moreover, the addressing of such needs can also be secured through the assistance available to the judicial police as a result of (i) the express preservation in force of similar or corresponding competences of the regular police force and other public services regarding their cooperation with judicial and prosecutorial authorities (evidence 2, Article 4(3)), and (ii) the possibility for the judicial police or the competent judicial or prosecutorial authorities to seek the assistance of other public authorities, in particular tax, audit and port authorities, as well as independent administrative authorities (evidence 2, Article 4(4)). As of this, this minimal deviation does not change the nature of

the measure and does not affect the progress towards achieving the reform that the milestone represents.

On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 235 Training - Judges and Clerks

**Related Measure:** 4.3.16733 Skills and digital skills for judges and judicial employees (judicial staff)

**Qualitative Indicator:** Report certifying implementation of changes in the educational programme of the National School of Judges and enrolment of judges and clerks in lifelong training

**Time:** Q4 2024

### 1. Context:

Milestone 235 is part of measure 16733, whose objective is to impart skills, including digital skills, to judges and judicial employees, by means of introducing institutional changes to the function and educational programme of the national school of judges, revising and widening its candidate selection criteria and offering additional courses to impart new skills, with emphasis on managerial and digital skills as well as on topics relevant to the performance of judicial duties. The measure includes the provision of mandatory lifelong training to judges in topics essential for the performance of their duties by trainers also selected by the school. Finally, the measure provides for the creation of a new educational programme for judicial clerks within the school, to provide training and lifelong training to judicial staff on topics essential for the performance of their duties, the management and organization of their service, and the acquisition of digital skills and of knowledge of procedural and substantive law.

Milestone 235 concerns the completion of the projects included in the reform on skills and digital skills for judges and judicial employees, with (1) the enrolment of 7,029 judges and clerks in lifelong training and their completion of at least one training session, (2) the educational programme for judicial employees within the national school of judges in operation, (3) the implementation of changes in the selection criteria and the educational programme of the school, the latter aiming in particular at enhancing practical training and offering courses according to the law and (4) the provision of lifelong training to judges and judicial employees on various topics, such training being a prerequisite to the professional advancement of judges.

Milestone 235 is the third and last milestone of the reform, and it follows the completion of target 224, related to the enrolment of ten magistrate's court judges in the national school of judges and target 228, related to the enrolment of 14 additional magistrate's court judges and one judge of the court of audit in the national school of judges. The completion date for the implementation of the reform was 31 December 2024.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                  | Short description                                                                                               |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                        |                                                                                                                 |
| 2 | A document signed by the permanent secretary of the Ministry of Justice, dated 11 July 2025, under protocol No. 40902, styled "Document on the implementation of milestone 235 (summary document)"    | Report by the Ministry of Justice on the implementation of milestone 235                                        |
| 3 | Law No. 4871/2021, published in the Official Journal, Section A, No. 246/10 December 2021, styled "Reforms in the legislative framework of the National School of Judges and other urgent provisions" | Primary legislation on the creation, organisation, administration and function of the National School of Judges |
| 4 | Law No. 5001/2022, published in the Official Journal, Section A, No. 227/09 December                                                                                                                  | Primary legislation amending evidence 3                                                                         |

|    |                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                             |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | 2022, styled “Selection, training, and lifelong training of judicial clerks at the National School of Judges – Amendments to Law 4871/2021 and other provisions of the Ministry of Justice”                                                                                                                                                                  |                                                                                                                                                             |
| 5  | Law No. 5016/2023, published in the Official Journal, Section A, No. 21/04 February 2023, styled “International commercial arbitration – Provisions on the function of the Court of Audit and other urgent provisions”                                                                                                                                       | Primary legislation amending evidence 3                                                                                                                     |
| 6  | Law No. 5108/2024, published in the Official Journal, Section A, No. 65/02 May 2024, styled “Unification of the first instance of jurisdiction and Restructuring of the spatial planning of courts of civil and penal justice and other provisions”                                                                                                          | Primary legislation amending evidence 3                                                                                                                     |
| 7  | Law No. 3689/2008, published in the Official Journal, Section A, No. 164/05 August 2008, styled “National School of Judges and other provisions”                                                                                                                                                                                                             | Older primary legislation on the creation, organisation, administration and function of the National School of Judges, abrogated by virtue of evidence 3    |
| 8  | Law No. 4938/2022, published in the Official Journal, Section A, No. 109/06 June 2022, styled “Code on the Organisation of Courts and on the status of Judges and other provisions”                                                                                                                                                                          | Primary legislation amending evidence 3                                                                                                                     |
| 9  | Certificate issued by the director of financial planning and financial affairs of the national school of judges, under protocol No. 576/02 July 2025                                                                                                                                                                                                         | Certification of the provision of lifelong training to judges and judicial employees, with an appendix listing the participants per category                |
| 10 | Report signed by the head of department for the implementation of public investment and the recovery and resilience fund of the National School of Judges, styled “Accountability assessment report of the lifelong training of judicial employees in 2023, as part of the project Sub 5. Lifelong Training of Judicial Employees under code No. TA 5215672” | Implementation of the lifelong training of judicial employees for 2023                                                                                      |
| 11 | Decision of the director of financial planning and financial affairs of the national school of judges, under protocol No. 8493/17 December 2024                                                                                                                                                                                                              | Qualitative and quantitative acceptance of the deliverables of the project regarding the implementation of lifelong training of judicial employees for 2023 |
| 12 | Report signed by the head of department for the implementation of public investment and the recovery and resilience fund of the National School of Judges, styled “Accountability assessment report of the lifelong training of judicial employees in                                                                                                        | Implementation of the lifelong training of judicial employees for 2024                                                                                      |

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|    | 2024, as part of the project Sub 5. Lifelong Training of Judicial Employees under code No. TA 5215672”                                                                                                                                                                                                                               |                                                                                                                                                                     |
| 13 | Decision of the director of financial planning and financial affairs of the national school of judges, under protocol No. 4298/27 May 2025                                                                                                                                                                                           | Qualitative and quantitative acceptance of the deliverables of the project regarding the implementation of lifelong training of judicial employees for 2024         |
| 14 | Report signed by the head of department for the implementation of public investment and the recovery and resilience fund of the National School of Judges, styled “Accountability assessment report of the lifelong training of judges in 2023, as part of the project Sub 2. Lifelong Training of Judges under code No. TA 5189046” | Implementation of the lifelong training of judges for 2023                                                                                                          |
| 15 | Decision of the director of financial planning and financial affairs of the national school of judges, under protocol No. 4316/27 May 2025                                                                                                                                                                                           | Qualitative and quantitative acceptance of the deliverables of the project regarding the lifelong training of judges for 2023                                       |
| 16 | Report signed by the head of department for the implementation of public investment and the recovery and resilience fund of the National School of Judges, styled “Accountability assessment report of the lifelong training of judges in 2024, as part of the project Sub 2. Lifelong Training of Judges under code No. TA 5189046” | Implementation of the lifelong training of judges for 2024                                                                                                          |
| 17 | Decision of the director of financial planning and financial affairs of the national school of judges, under protocol No. 4356/28 May 2025                                                                                                                                                                                           | Qualitative and quantitative acceptance of the deliverables of the project regarding the lifelong training of judges for 2024                                       |
| 18 | Decision of the general director of the national school of judges, dated 30 January 2023 and digitally signed, under act No. 13 and online upload designation (AΔA) Ψ60146ΨX0A-467                                                                                                                                                   | Appointment of the teaching staff per course for the civil-penal, administrative and magistrate’s court sections of the national school of judges for the year 2023 |
| 19 | Decision of the general director of the national school of judges, dated 14 November 2023 and digitally signed, under act No. 164 and online upload designation 654T6ΨX0A-ΓΨ8                                                                                                                                                        | Appointment of the teaching staff per course for the administrative section of the national school of judges for the year 2024                                      |
| 20 | Decision of the general director of the national school of judges, dated 13 November 2023 and digitally signed, under act No. 158 and online upload designation ΨXT646ΨX0A-K92                                                                                                                                                       | Appointment of the teaching staff per course for the civil-penal, magistrate’s court and prosecutors’ sections of the national school of judges for the year 2024.  |
| 21 | Decision of the general director of the national school of judges, dated 25 November 2024 and digitally signed, under                                                                                                                                                                                                                | Appointment of the teaching staff per course for the civil-penal, and prosecutors’ sections of the national school of judges for the year 2025.                     |

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|    | act No. 157 and online upload designation<br>Ψ03146ΨX0A-7ΨZ                                                                                                                     |                                                                                                                                      |
| 22 | Decision of the general director of the national school of judges, dated 10 January 2025 and digitally signed, under act No. 7 and online upload designation<br>9EΨ546ΨX0A-9Σ0  | Appointment of the teaching staff per course for the administrative section of the national school of judges for the year 2025.      |
| 23 | Decision of the general director of the national school of judges, dated 22 June 2023 and digitally signed, under act No. 72 and online upload designation 669H46ΨX0A-3YΣ       | Appointment of the teaching staff per course for the judicial employees' section of the national school of judges for the year 2023. |
| 24 | Decision of the general director of the national school of judges, dated 13 November 2023 and digitally signed, under act No. 151 and online upload designation 670Θ46ΨX0A-3AΣA | Appointment of the teaching staff per course for the judicial employees' section of the national school of judges for the year 2024. |
| 25 | Decision of the general director of the national school of judges, dated 28 November 2024 and digitally signed, under act No. 159 and online upload designation 6NΓΨ46ΨXX0A-Θ1K | Appointment of the teaching staff per course for the judicial employees' section of the national school of judges for the year 2025. |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Completion of projects included in the reform on skills and digital skills for judges and judicial employees, with:**

#### 1. 7,029 judges and clerks enrolled in lifelong training and having attended at least one training session (seminar).

The Greek authorities provided evidence establishing the implementation of above deliverable under milestone 235. More specifically, according to the certificate issued on 2 July 2025 by the Director of Financial planning and financial affairs of the National School of Judges (evidence 9), in 2023 and 2024 the National School of Judges held:

- A total of 30 lifelong training sessions for judges (13 in 2023 and 17 in 2024), with a total number of 2,978 individual participants in at least one training session.
- A total of 17 lifelong training sessions for judicial clerks (3 in 2023 and 14 in 2024), with a total number of 4,391 individual participants in at least one training session.

It ensures that 7,369 judges and judicial clerks, as listed per relevant category in the list appended to aforementioned evidence 9, attended at least one training session in 2023 and 2024, exceeding the number prescribed in the milestone description.

Evidence 9 moreover states that the tables of above participants attached to it are anonymized for reasons of personal data protection, listing instead the unique registration number assigned to each participant. In addition, the Greek authorities also provided accountability assessment reports detailing the lifelong training sessions that took place in 2023 and 2024 for both categories of participants (judges and judicial clerks) and listing the date of each session, the manner of attendance (physical or online), the topics covered and the number of attendants per session, as per the relevant report signed

by the head of department for the implementation of public investment and the recovery and resilience fund of the National School of Judges, (evidence 10 and 12 regarding judicial clerks and evidence 14 and 16 regarding judges); the reports in question were approved by virtue of decisions of the director of financial planning and financial affairs of the national school of judges (evidence 11 and 13 regarding judicial clerks and evidence 15 and 17 regarding judges)

## **2. The educational programme for Judicial Clerks within the National School of Judges in operation.**

The new educational programme for judicial clerks was created within the National School of Judges by virtue of Law 4871/2021 (evidence 3), as amended by law 5001/2022 (evidence 4). More specifically, articles 13 to 47 of Law No. 5001/2022 (evidence 4) introduced 36 new Articles - numbered from 55(A) to 55(LST) - into Law 4871/2021 (evidence 3). Unless otherwise specified, all references to evidence 3 hereunder refer to its current version, as further amended by Law 5001/2022, Law 5016/2023, Law No. 5108/2024 and Law No. 4938/2022 (evidences 4, 5, 6 and 8 respectively). Regarding the effective operability of the educational programme for judicial clerks, the Greek authorities provided three decisions of the general director of the National School of Judges, taken in conformity with the relevant provisions of Articles 7, section (c), 9, section (i) and 55C(1), section (z) of Law 4871/2021, for each of the academic years 2023, 2024 and 2025 (evidences 23, 24 and 25 respectively), appointing the instructors and assigning them teaching duties as well as setting forth the individual courses and the number of teaching days and hours. In addition to the provisions referred to, the 17 lifelong training sessions for judicial clerks described above also demonstrate that the educational programme for judicial clerks within the National School of Judges is operational.

## **3. Changes in selection criteria according to Law 4871/2021 implemented.**

In comparison with the previous law on the national school of judges (evidence 7), the law currently in force (evidence 3, whose Article 54 abrogated evidence 7) introduced several changes in selection criteria. More specifically:

- Its Article 16(1) added a new category of judges to the directions of studies, namely the judges at the court of audit.
- Regarding the age limit for participation in the entrance examination, its Article 17(1) reduced the maximum age to 40 years (from 45 years under evidence 7, Article 10(1)).
- Regarding the qualifications for participating in the entrance examination, while the relevant provision of evidence 7, namely Article 10(1) point (a) required two years or, in the case of candidates holding a PhD, one year of lawyer practice and, in the case of candidates serving as judicial employees, five years of service, evidence 3 (Article 17(1) point (a) now requires, respectively, three years of lawyer practice and 30 appearances in court or, in the case of candidates holding a PhD, two years of lawyer practice and 20 appearances in court and, in the case of candidates serving as judicial employees, six years of service.
- Regarding the conduct of the entrance examination, while the relevant provision of evidence 7 (Article 13(4) point (a) stipulated a coefficient of 85% for the written part of the examination and 15% for the oral part, the relevant provision of evidence 3 (Article 20(4) now prescribes a reduced coefficient of 75% for the written part of the examination and an increased one of 25% for the oral part.
- Regarding the written stage of the entrance examination, while the relevant provision of evidence 7 (Article 12(2) stipulated that it should consist of the synthetic presentation of a case study exercise of the relevant thematic unit, the relevant provision of evidence 3 (Article 19(2) point (c) now stipulates that it will consist of the processing of a legal writ (e.g. lawsuit) or appeal or other means of recourse or memorandum, and of the resolution of the legal problems identified by the examination board.

- Regarding the subject matters of the written stage of the entrance examination, evidence 3 (Article 19(2)) added EU law to the subjects covered for administrative justice candidates.
- Finally, regarding the grading of candidates, evidence 3 (Article 20(5)) limits the number of post-graduate degrees increasing the grade by 10% to two such degrees and entrusts the members of the examination panel with verifying whether the relevant conditions for such an increase are met, whereas the relevant provision of evidence 7 (Article 13(4)) point (b) provided neither for an upper limit to the number of such degrees nor for entrusting the examination board with such a verification.

**Changes implemented in the educational programme of the National School of Judges aiming in particular at enhancing practical training and offering courses according to the above law.**

Regarding the first stage of the educational programme, namely the delivery of courses at the premises of the National School of Judges, the relevant requirements of Law 4871/2021 (evidence 3, Article 25(1) points b-k) have been complied with. These provisions require that educational programmes place emphasis on practical aspects of the judicial duties listed therein. The compliance is demonstrated by the educational programmes of the National School of Judges for the academic years February 2023-June 2024 (evidence 18), February 2024 -June 2025 (evidence 19 and 20), and February 2025 to June 2026 (currently in progress, evidence 21 and 22), as submitted by the Greek authorities. These educational programmes are more specifically:

- i. The methodology of processing files (evidence 18, pages 2, 4, 6, 7, 18, evidence 19, page 2, evidence 20, page 5, evidence 21, pages 2, 3 and evidence 22, pages 3, 6).
- ii. The drafting of decisions of all kinds as well as of various submissions to judicial councils or chambers (evidence 18, pages 6, 18, evidence 19, page 2, 6, evidence 20, page 8, 11, evidence 21, pages 2, 3 and evidence 22, page 4).
- iii. Participation in mock trials (for processing real cases), mock chamber deliberations and workshops, (evidence 18, pages 7, 8, 12, 19, evidence 19, pages 7, 8, evidence 20, page 6, evidence 21, pages 2, 3, 11, 12 and evidence 22, pages 2, 3, 5).
- iv. Techniques of time management in processing cases, (evidence 18, pages 3, 9, 18, evidence 19, page 3, 10, evidence 20, pages 3, 5, evidence 21, pages 4, 8 and evidence 22, pages 2, 4).
- v. Education on behaviour towards colleagues, court officials, lawyers and parties, (evidence 18, pages 8, 13, 18, 20, 26, evidence 19, page 8, evidence 20, page 3, evidence 21, pages 3, 7 and evidence 22, pages 2, 6).
- vi. Training on IT and communication technology, including the use of artificial intelligence as related to legal science (evidence 18, pages 3, 4, 9, 13, 27, evidence 19, page 3, 4, 9, 15, evidence 20, page 3, evidence 21, pages 4, 5, 8, 22 and evidence 22, page 2).

Regarding the further enhancement of practical training at the second stage of the curriculum, namely the assignment of students to courts, Law 4871/2021 (evidence 3 (Article 31(1)) provides for an increase of the duration of that stage to six months, as compared to five months under Law 3689/2008 (evidence 7). Moreover, evidence 3 provides, in Article 31(2), for the rotation of students among trainers during the practical training, for them to be trained in several fields. There was no such provision in the corresponding Article 25(2) of evidence 7.

**Provision of lifelong training to judges and judicial clerks extending to various fields according to above Law.**

Regarding the implementation of the part of the present constitutive element of milestone 235 referring to the conduct of lifelong training sessions for judges and judicial employees, reference is made to the analysis hereinabove regarding the first element of the milestone.

Regarding the coverage of various fields in the context of lifelong training to judges, Law 4871/2021 (evidence 3, Article 42) sets forth an indicative list of lifelong training topics, including (i) Developments of European Union law, case-law of the European Court of Justice, the General Court and the European

Court of Human Rights, (ii) human rights, protection of vulnerable persons and judicial treatment of minorities, (iii) rights of minors and principles of children-friendly justice, (iv) rights of persons with disabilities, (v) developments in social security, (vi) legislative and judicial developments in matters of administrative, financial, civil, commercial, criminal and labour law, (vii) procedural law issues in administrative, civil and penal proceedings, (viii) new forms of organised economic and terrorist crime, as well as issues related to money laundering, (ix) treatment of addicted persons, (x) operation of the penitentiary system and identification of issues, (xi) the impact and application of new technologies, in particular IT, artificial intelligence and electronic systems, on law and the judiciary, (xii) urban, town and country planning, public works, (xiii) protection of natural and cultural environments and sustainable development, (xiv) civil liability, (xv) intellectual property, (xvi) energy, capital market, competition, consumer protection, (xvii) anti-corruption, (xviii) macroeconomics and microeconomics principles, (xix) banking law and finance and (xx) judicial mediation and alternative dispute resolution. In compliance with the indicative enumeration of above provision, the lifelong training sessions for judges organized in 2023 and 2024 covered the following topics, according to evidence 14 and 16: Digital and virtual economy (topic xi hereinabove), EU law (topic i hereinabove), anti-corruption (topics viii, xvii hereinabove), court management and ethics, rule of law (topics I to iv hereinabove), energy law (topic xvi hereinabove), enforcement of criminal decisions and implementation of the penal code (topics vi, vii, x hereinabove), domestic violence (topics ii, iii hereinabove), forensic psychiatry-psychology (topics ii, iii, iv, ix hereinabove), tax and customs law, competition and consumer protection (topic xvi hereinabove), human trafficking (topic ii hereinabove), national cadastre issues, issues arising from the practical enforcement of the European arrest warrant (topics ii and vii hereinabove), cross-border cooperation in tackling organized crime, human trafficking, drugs and serious crimes (topics ii, viii, ix hereinabove), the presence of Greece in the European legislative, political and judicial power (topic I hereinabove), appeal of prisoners regarding conditions of detention and just compensation (topics I, ii, vi, vii and x hereinabove), appeal to the European Court of Human Rights (topics I, ii hereinabove), sport violence and its treatment in criminal law (topic vi, vii hereinabove), banking and finance law (topic xix hereinabove), EU and national law of energy and environmental law (topics I, xiii and xvi hereinabove), artificial intelligence and the protection of personal data (topics xi and xv hereinabove), international, EU and national legal frameworks for the protection of refugees (topics i, ii hereinabove), transnational and national programmes and action plans to promote child-friendly justice (topic iii hereinabove) and current tax law issues.

Regarding the coverage of various fields in the context of lifelong training to judicial employees, Article 55KH(2) of Law 4871/2021 (evidence 3, sets forth an indicative list of lifelong training topics relative to the performance of their duties, such as the organisation and management of the service, ethical rules, time management and communication and digital skills. In compliance with above provision, the lifelong training sessions for judges organized in 2023 and 2024 covered the following topics, according to evidence 10 and 12: code of judicial officers, principles and elements of criminal procedure and criminal law, general data protection regulation, basic digital knowledge and skills, work burnout and dealing with stress in the workplace, communication, personal and work relationships in the workplace, training in providing first aid in the workplace, rules of ethics, public administration and vulnerable social groups, quality of services provided, the rights of people with disabilities in the legal system, introductory course on bankruptcy proceedings, public procurement contracts, human resources management, job analysis, administrative justice and the council of state.

**For judges, such training being a prerequisite to professional advancement.**

According to the uniform stipulation of the relevant provisions of Law 4871/2021 (evidence 3), namely Articles 74(3), regarding council of state judges, 77 paragraph 4, regarding administrative courts' judges, 83(6) regarding court of audit judges and 89(7), regarding civil and penal courts' judges, the completion of mandatory lifelong training programmes, foreseen by the provision of Article 40(2), are a prerequisite for the promotion of judges.

Furthermore, in line with the description of the measure, **it shall also offer judges additional courses aiming at the provision of new skills, with emphasis on managerial and digital skills, as well as on topics relevant to the performance of judicial duties, according to law 4871/2021**

Regarding the fulfilment of this element of the reform, reference is made to the analysis hereinabove regarding the changes implemented in the educational programme of the National School of Judges, which lists, among the training topics offered to judges, the methodology of processing files, techniques of time management in processing cases and training on IT and communication technology, including the use of artificial intelligence as related to legal science

Furthermore, in line with the description of the measure, the reform shall **include the provision of mandatory lifelong training to judges in topics essential for the performance of their duties by trainers also selected by the National School of Judges according to law 4871/2021.**

Regarding the selection of trainers by the national school of judges, the relevant provisions of Article 45(1)(2) of Law 4871/2021 (evidence 3), stipulate that it is made by the school's head of training and lifetime training from among the following categories of legal professionals appointed by the school's council of studies , as per its Article 49(1)(3): (i) acting judicial officers holding the rank of rapporteur of the council of state or the court of audit or the general commission of state of the court of audit with at least ten years of seniority, (ii) presidents of a court of first Instance, civil, penal or administrative or judge of a court of first instance, (iii) prosecutors of first (iv) members of the teaching staff of universities from the level of assistant professor, (iv) members of boards of directors of recognised scientific associations, public officials, lawyers with at least 15 years of experience and other scientific specialists, (v) emeriti supreme courts' judges; (vi) professors emeriti of the faculties of law, (vi) magistrates who have left active service after at least twenty years of service and (viii) IT specialists.

The adherence to the above-described stipulations of evidence 3 in the context of the lifelong training sessions for judges that took place in 2023 and 2024 is confirmed by the relevant reports signed by the head of department for the implementation of public investment and the recovery and resilience fund of the National School of Judges (evidences 14 and 16 respectively), in their respective sections No. 4.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 244a E-auctions for debt enforcement

**Related Measure:** 4,4.16957 Strengthening the capacity of the financial system to overcome legacy challenges and finance the real economy

**Qualitative Indicator:** Entry into force of legislation

**Time:** Q2 2024

### 1. Context:

This reform aims at reducing the private debt stock by improving the insolvency process, empowering the non-performing loans (NPL) market and preventing future private debt build-up by eliminating information gaps. The reform consists of the following sub-reforms:

- (i) improvement of the e-auction process and expanding the information available on the auctioned assets in the e-auctions platform.
- (ii) completion of policy actions envisaged by the National Strategy for Private Debt Management.
- (iii) establishment of the Central Credit Registry (CCR) that would complement the Hercules Asset Protection Scheme, enhancing the NPL secondary market.
- (iv) speeding up the handling of oppositions against enforcement procedure and (v) streamlining the judicial proceedings through the introduction of targeted amendments to the Code of Civil Procedure (CCP).

Milestone 244a requires the adoption and entry into force of legislation to:

- (i) Expand the information available on the auctioned assets in the e-auctions platform, including relevant information available in notaries' public archives;
- (ii) Elimination of deterrence factors occasioned by property-related overdue debts (e.g. public utility bills).

Milestone 244a is the first milestone of the reform, together with milestone 244b in this payment request. It will be followed by milestone 244c, related to the completion of policy actions of the National Strategy for Private Debt Management, establishment of the Central Credit Registry and the speeding up of the handling of oppositions against enforcement procedure and streamlining the judicial proceedings.

The implementation of the overall reform shall be completed by 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                                                                                                         |
|---|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                                                                                                           |
| 2 | Law 5134/2024, published in the Official Journal A, No. 146/11.09.2024.<br><br>Entry into force: 16 September 2024             | Primary legislation on "Interventions in the Code of Civil Procedure, the Code of Court Organization and Status of Judicial Officers and the Code of Criminal Procedure in harmonization with the unification of the first instance of jurisdiction with Law 5108/2024 - Provisions on the Judicial Police and other urgent regulations." |

|   |                                                                                                                |                                                                                                                                                                                                                                                                                              |
|---|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                | <p><u>Article 45</u>: Collection of Information on Seized Property by a Bailiff – Amendment to Article 995 of the Code of Civil Procedure.</p> <p><u>Article 47</u>: Compulsory public auctions - Amendment of paragraph 1 of Article 1005 of the Code of Civil Procedure</p>                |
| 3 | Binding opinion, released by the Supreme Court of Civil and Criminal Justice (“Areios Pagos”), No. 3/18-3-2025 | Binding opinion (No 3/18-3-2025), in the form of a circular, requested by the National Bailiffs’ Federation from the Supreme Court of Civil and Criminal Justice, clearly stating the obligation of bailiffs to collect all necessary data to be subsequently posted by the auction officer. |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Adoption and entry into force of legislation to: (i) Expand the information available on the auctioned assets in the e-auctions platform, including relevant information available in notaries’ public archives.** Furthermore, in line with the description of the measure, **first, it concerns the improvement of the e-auction process and expanding the information available on the auctioned assets in the e-auctions platform.**

The Law 5134/2024 (evidence 2) was published on 11 September 2024 and according to Article 20 of this Law, it entered into force on 16 September 2024.

Article 45, paragraph 1 (Collection of Information on Seized Property by a Bailiff – Amendment to Article 995 of the Code of Civil Procedure) sets out the obligations of the bailiff to collect and upload all the necessary information on the auctioned assets in the e-auctions platform, by adding the following two subparagraphs in paragraph 4 of Article 995 of the Code of Civil Procedure:

Addition to Paragraph 4: The bailiff collects any other information and documents indicating the value of the property seized, such as building permits, topographic diagrams and views, and delivers them to the auction officer, who shall post them on the same website no later than thirty (30) days before the auction.

All competent public authorities and notaries are obliged to provide these documents to the bailiff.

The first subparagraph added to paragraph 4 of Article 995 of the Code of Civil Procedure by Article 45, paragraph 1 of Law 5134/2024, stipulates that the collection of the elements and documents listed in this provision is mandatory for the responsible bailiff. This conclusion is further reinforced by the final subparagraph of the same provision, which imposes a duty on the competent public authorities and notaries to provide the bailiff with the relevant documents. The provisions in paragraph 1 of Law 5134/2024 enter into force on 1 December 2024, as paragraph 2 stipulates.

In addition to the mandatory nature of the above provisions, the National Bailiffs’ Federation has requested the Supreme Court of Civil and Criminal Justice (Areios Pagos) to issue a binding opinion on the proper implementation of this Article (No 7456/20.02.2025 document of National Bailiffs’ Federation), in order to avoid relevant doubts or objections. The Supreme Court of Civil and Criminal Justice (Areios Pagos) has provided its Binding Opinion (evidence 3), in the form of a circular, clearly stating the obligation of bailiffs to collect all necessary data to be subsequently posted by the auction officer. Specifically, the Supreme Court opined that it is mandatory for the bailiff to collect additional

information about the properties being auctioned, and that the public services to which s/he addresses her/himself to collect this information are under the obligation to provide it.

**Adoption and entry into force of legislation to: ii) Elimination of deterrence factors occasioned by property-related overdue debts (e.g. public utility bills)**

Article 47 of Law 5134/2024 (evidence 2) sets the provisions to eliminate deterrence factors occasioned by property-related overdue debts, by adding a new third subparagraph to paragraph 1 of Article 1005 of Code of Civil Procedure:

Addition to Paragraph 1: Provisions which provide that a claim for the supply of electricity, irrigation, water or natural gas shall be borne by the special successor of the principal movable or immovable property shall not apply to a compulsory public auction.

According to the new provisions of Article 1005, Paragraph 1, the deterrent factors caused by property-related debts, such as unpaid public utility bills, in the event of a compulsory public auction are eliminated, by stipulating that special successors to the primary movable or immovable property shall not be held responsible for overdue electricity, water, irrigation, or natural gas bills.

Furthermore, In line with the measure description, the reform concern the **improvement of the e-auction process and expanding the information available on the auctioned assets in the e-auctions platform. This has been achieved** by the adoption of the Law 5134/2024 (evidence 2) mentioned above, that introduced targeted Interventions to the Code of Civil Procedure relevant to the auction process under articles 45 and 47. As analysed above, Article 45 of the aforementioned law, accompanied with the binding opinion of the Supreme Court of Civil and Criminal Justice (Areios Pagos) (evidence 3), led to the **expansion of the information available on the auctioned assets in the e-auctions platform.**

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 244b Contract award for financial sector measures

**Related Measure:** 4,4.16957 Strengthening the capacity of the financial system to overcome legacy challenges and finance the real economy

**Qualitative Indicator:** Notification of award of contracts

**Time:** Q2 2024

### 1. Context:

This reform aims at reducing the private debt stock by improving the insolvency process and empowering the non-performing loans (NPL) market. The first sub-reform requires the expansion of information on auctioned assets. The second sub-reform consists of the establishment of the Public Credit Rating Information System and the Private Debt Monitoring Registry, and the establishment of a common transaction platform and data templates. The third sub-reform consists of the establishment of the Central Credit Registry. Finally, the fourth sub-reform consists of speeding up oppositions against enforcement procedures and streamlining judicial proceedings through targeted Code of Civil Procedure (CCP) amendments and the creation of a mechanism for faster liquidation case hearings.

Milestone 244b requires the Contract award for the:

- (i) Development of the credit rating IT system for the Public Credit Rating Information System;
- (ii) Development of the Private Debt Monitoring Registry;
- (iii) Development of the Central Credit Registry.

Milestone 244b is the first step of the implementation of the reform and it is accompanied by Milestone 244a in this payment request, which concerns the e-auction process. It will be followed by milestone 244c, related to the completion of policy actions of the National Strategy for Private Debt Management, establishment of the Central Credit Registry and the speeding up of the handling of oppositions against enforcement procedure and streamlining the judicial proceedings. The reform has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                                                                                                                      |
|---|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                                                                                                                        |
| 2 | Law 4972/2022<br>Official Journal<br>A' 181/23-09-2022                                                                         | The law establishes the Public Credit Rating Information System and the Central Credit Registry (CCR)                                                                                                                                                                                                                                                  |
| 3 | Law 5072/2023<br>Official Journal<br>A' 198/04-12-2023                                                                         | The law establishes the Private Debt Monitoring Registry                                                                                                                                                                                                                                                                                               |
| 4 | Request for Proposals<br>ADAM:<br>24PROC014184866<br>2024-01-29                                                                | The call for tender was published on 29 January 2024 by the Information Society SA. It includes the development of the Public Credit Rating Information System that contains a central database and a single credit rating system for the assessment of the credit worthiness of debtors (individuals and legal entities) based on public sector data. |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                    |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | Unique ESIDIS<br>Number: 328283                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                    |
| 5  | Decision of Contract<br>Award<br>ADAM:<br>24AWRD015169926<br>2024-07-22<br><br>Protocol Number:<br>17189/22-07-2024                                                                                                                                                                                                                                                                                                                                                                                                | The project was awarded on 22 July 2024, by the Contracting Authority<br>Information Society SA.                                                                                                                                                                                   |
| 6  | Notification of<br>Contract Award for<br>the RFP with<br>ESIDIS Unique Number<br>328283                                                                                                                                                                                                                                                                                                                                                                                                                            | The notification of all participants was sent via ESIDIS on 23 July 2024, by<br>the Information Society SA.                                                                                                                                                                        |
| 7  | Request for Proposals<br><br>ADAM:<br>24PROC014705916<br>2024-05-01<br><br>Unique ESIDIS<br>Number: 349938                                                                                                                                                                                                                                                                                                                                                                                                         | The call for tender was published on 1 May 2024 by the Information<br>Society SA.<br><br>It includes the development of the IT system of the Private Debt<br>Monitoring Registry which collects data from public and private<br>creditors, as well as from other relevant sources. |
| 8  | Decision of Contract<br>Award<br>ADAM :<br>24AWRD015751539<br>2024-11-12<br><br>Protocol Number:<br>25421/07-11-2024                                                                                                                                                                                                                                                                                                                                                                                               | The project was awarded on<br>7 November 2024, by the Contracting Authority Information Society SA.                                                                                                                                                                                |
| 9  | Notification of<br>Contract Award for<br>the RFP with<br>ESIDIS Unique Number<br>349938                                                                                                                                                                                                                                                                                                                                                                                                                            | The notification of all participants was sent via ESIDIS on 12 November<br>2024 by the Information Society SA.                                                                                                                                                                     |
| 10 | Request for Proposals<br>(RFP)<br><br><a href="https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-enhmerwsewn/enhmerwseis?announcement=f7285f36-2790-4b15-b222-550aaccbc50">https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-enhmerwsewn/enhmerwseis?announcement=f7285f36-2790-4b15-b222-550aaccbc50</a><br><a href="https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-enhmerwsewn/enhme">https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-enhmerwsewn/enhme</a> | The call for tender was published on 9 May 2023 by the Bank of Greece.<br><br>it includes the supply of equipment and software for the needs of the<br>Information Systems Directorate of Bank of Greece to support the<br>operation of the CCR.                                   |

|    |                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                         |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | rwseis?announcement=f7285f36-2790-4b15-b222-550aacccbc50                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                         |
| 11 | Official communication by the Procurement Unit of the Bank of Greece<br>Protocol Number: 421/16.06.2025                                                                                                                                                                                                                                                     | Excerpt from the Minutes of the Committee for Works and Procurement Contracts of the Bank of Greece regarding the award of contracts for the projects related to the requirements 3.1, 3.2 & 3.3                                                                                                                                                                                                        |
| 12 | Notification of Contract Award<br>23 October 2023<br><br><a href="https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-enhmerwsewn/enhmerwseis?announcement=3f28d377-65e4-45cd-a4d0-24f26f39b45b">https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-enhmerwsewn/enhmerwseis?announcement=3f28d377-65e4-45cd-a4d0-24f26f39b45b</a>      | Announcement of the result of the open electronic tender for the supply of ORACLE infrastructure hardware on the website of the Bank of Greece on 23 October 2023                                                                                                                                                                                                                                       |
| 13 | Notification of Contract Award<br>Electronic correspondence between the Bank of Greece and Oracle on 21 December 2023                                                                                                                                                                                                                                       | Electronic correspondence between the Bank of Greece and Oracle regarding the signing of the contract for the procurement of software                                                                                                                                                                                                                                                                   |
| 14 | 244b_16957_R_Policy and Guidelines_BoG                                                                                                                                                                                                                                                                                                                      | Procurement Policy and Guidelines of the Bank of Greece<br>September 2022                                                                                                                                                                                                                                                                                                                               |
| 15 | Request for Proposals, published by the Bank of Greece<br><br><a href="https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-enhmerwsewn/enhmerwseis?announcement=dd067e44-3fc2-4184-9aae-f4684b9555bb">https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-enhmerwsewn/enhmerwseis?announcement=dd067e44-3fc2-4184-9aae-f4684b9555bb</a> | The call for tender was published on 10 January 2024 by the Bank of Greece.<br><br>It includes the supply of hardware and software for the expansion of the backup infrastructure at the main and the alternative IT centre of the Bank of Greece, as well as the provision of related installation, maintenance and technical support services to support the operation of the Central Credit Registry |
| 16 | Notification of Contract Award<br>15 July 2024<br><a href="https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-">https://www.bankofgreece.gr/enimerosi/grafeio-typoy/anazhthsh-</a>                                                                                                                                                               | Announcement of the result of the open electronic tender on the website of Bank of Greece on 15 July 2024                                                                                                                                                                                                                                                                                               |

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|----|-------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | enhmerwsewn/enhme<br>rwseis?announcement<br>=e4230080-ad2d-<br>4d1e-a4c2-<br>3b6cb97cf6d7                                                       |                                                                                                                                                                                                                                                                                                                              |
| 17 | Provision of extension<br>services under<br>framework agreement<br>4600000703ΔΠΛ/2022<br>ΣΥ) with the<br>contractor.                            | The framework agreement refers mainly to consultancy and other<br>services for the analysis, design, implementation and other tasks for the<br>creation or extension of Bank of Greece's web portals sites based on the<br>Microsoft Net Framework application on 26 March 2022                                              |
| 18 | Email of 12 December<br>2022 from the<br>Information Systems<br>Directorate to 'Linakis<br>Digital'                                             | The invitation for the implementation of the Unclassified and Classified<br>Environment of the CCR Portal was sent by the Bank of Greece to<br>'Linakis Digital' on 12 December 2022                                                                                                                                         |
| 19 | Technical offer<br>20 June 2023                                                                                                                 | Technical offer of Linakis Digital regarding the Unclassified Environment<br>of the CCR Portal on 20 June 2023                                                                                                                                                                                                               |
| 20 | Technical offer<br>26 March 2024                                                                                                                | Technical offer of Linakis Digital regarding the Classified Environment of<br>the CCR Portal on 26 March 2024                                                                                                                                                                                                                |
| 21 | Minutes of the<br>Procurement Unit<br>ΘΕΜΑ<br>01/ΔΠΛ/13.02.2024                                                                                 | Minutes of the Procurement Unit to the Committee for Works and<br>Procurement Contracts regarding the award approved by the General<br>Director of Operations for the implementation of the Unclassified<br>Environment of the CCR Portal to 'Linakis Digital', through the existing<br>framework agreement with the company |
| 22 | Document by the IT<br>Department<br>033/30.06.2023                                                                                              | Evaluation by the IT Department for the award of the implementation of<br>the Unclassified Environment of the CCR Portal to 'Linakis Digital',<br>through the existing framework agreement with the company                                                                                                                  |
| 23 | Notification of<br>Contract Award<br>Electronic<br>correspondence<br>between the Bank of<br>Greece and 'Linakis<br>Digital' on 10 July<br>2023  | Electronic correspondence between the Bank of Greece and 'Linakis<br>Digital' regarding the signing of the contract for the Unclassified<br>Environment of the CCR Portal on 10 July 2023                                                                                                                                    |
| 24 | Notification of<br>Contract Award<br>Electronic<br>correspondence<br>between the Bank of<br>Greece and 'Linakis<br>Digital' on 28 March<br>2024 | Electronic correspondence between the Bank of Greece and 'Linakis<br>Digital' regarding the signing of the contract for the Classified<br>Environment of the CCR Portal on 28 March 2024                                                                                                                                     |
| 25 | Framework<br>Agreement on<br>June 2023                                                                                                          | Framework Agreement (4600000ΔΠΛ/2023ΣΥ) for the Provision of<br>Consulting Services for Security Risk Assessment, Security Policy Review,<br>and Data Protection Impact Assessment on<br>26 June 2023 between Bank of Greece and PricewaterhouseCoopers<br>Business Solutions SA                                             |

|    |                             |                                                                                                                                                                                                                                                                                  |
|----|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                             |                                                                                                                                                                                                                                                                                  |
| 26 | Decision Π.Δ. 88/21-02-2022 | Decision by the Governor of BoG issued on 21 February 2022 establishing the Project Steering Committee of the CCR (PSC CCR), the Working Group CCR (WG CCR), appointing the members of the PSC CCR and the WG CCR and assigning the tasks related to the project implementation. |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

#### **Contract award for the: (i) Development of the Public Credit Rating Information System**

Greece provided evidence that Information Society SA, which is the contracting authority, issued the Decision for the launch of the tender for the Development of an Information System of the Independent Credit Rating Authority on 29 January 2024 (evidence 4). The contract is awarded following an open tender process, where the Decision of the award of the contract for the development of the Public Credit Rating Information System was issued by the contracting authority on 22 July 2024 (evidence 5). The award decision was notified to the tenderers on 23 July 2024 (evidence 6).

In addition, the Public Credit Rating Information System is established under Law 4972/2022, which was published and entered into force on 23 September 2022 (evidence 2).

Article 51, paragraph 1 of Law 4972/2022 establishes a credit rating system to assess the creditworthiness of natural and legal persons based on outstanding debts owed to the public sector. Article 51, paragraph 3 stipulates that in order to exercise the above competence, an integrated information system shall be created for the processing of economic behavior data, like debts, in order to evaluate the creditworthiness of debtors, collected from the archives of public sector bodies.

#### **(ii) Development of the Private Debt Monitoring Registry (PDMR)**

Greece provided evidence that Information Society SA, which is the contracting authority, issued the Decision for the launch of the tender for the Private Debt Monitoring Registry (hereinafter referred to as "PDMR") on 1 May 2024 (evidence 7). The contract was awarded following an open tender process on 7 November 2024 (evidence 8). The award decision was notified to the tenderers on 12 November 2024 (evidence 9).

Article 50, paragraph 1 of Law 5072/2023 (evidence 3) stipulates that a Private Debt Monitoring Registry (the "Registry") is hereby established and maintained by the competent General Secretariat for Private Debt of the Ministry of national Economy and Finance.

Furthermore, in line with the description of the measure, the PDMR will collect data from public and private creditors, as well as from other relevant sources. These elements are mentioned in the tender document provided by Greece (evidence 7, pages 129-130).

#### **(iii) Development of the Central Credit Registry. Furthermore, in line with the measure description, the third sub-reform refers to the establishment of the Central Credit Registry (CCR) that would complement the Hercules Asset Protection Scheme, enhancing the NPL secondary market.**

The Council Implementing Decision required the contract award for the Development of the Central Credit Registry (hereinafter referred to as "CCR"). Article 111 of Law 4972/2022 (evidence 2) stipulates that the CCR is established, and that the registry belongs to and is operated by the Bank of Greece.

Based on the aforementioned Article, the Bank of Greece is developing in-house the initial installation of the IT system, otherwise called the “Central Credit Registry”. Being an “in-house” IT tool, its initial establishment did not require any contract award. Subsequently, required software and hardware for the proper functioning of the IT system that cannot be provided in-house, was awarded to contractors listed below. In these cases, EL provided the notification of award of contracts, as required by the milestone description. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, this is acceptable, as the in-house implementation of the CCR was agreed by a joint Project Steering Committee on CCR (PSC CCR), with representatives from the Ministry of Economy and Finance and the Bank of Greece and a Working Group CCR (WG CCR) for developing the IT system of the CCR was established, under the Bank of Greece’s Governor Decision, on 21 February 2022 (evidence 26). That Decision appointed the members of the PSC CCR and of the WG CCR, and assigned the tasks related to the project implementation. Under the aforementioned Decision, the Bank of Greece will acquire some of the necessary IT resources and services from third parties for the development and operation of the CCR IT system, where the Committee will have a role to coordinate each outsourcing contract for the proper functioning of the CCR. The contractors have already been notified in line with the requirements of the Council Implementing Decision, as presented in the assessment below. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the reform that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

For the outsourcing services relevant to the Development of the Central Credit Registry, Greece provided the following notifications of contract awards:

**Award of the contract for the development of the Central Credit Registry - Upgrade and extension of ORACLE infrastructure hardware and supply of ORACLE software**

The Bank of Greece launched the tender for the “Supply of equipment and software for the needs of the information technology department” on 9 May 2023, (evidence 10) and led to two contracts for the following projects: “Upgrade and extension of ORACLE infrastructure hardware” and “Supply of ORACLE software”. The Commission services accessed the link provided by the authorities on 18 July 2025 to verify the abovementioned launch of the call for tenders. This check was completed successfully, confirming that the tender for the “Supply of equipment and software for the needs of the information technology department” was launched on 9 May 2023.

The contract for the supply of ORACLE infrastructure hardware is awarded through an open tender process on 10 October 2023 by the Committee for Works and Procurement Contracts of the Bank of Greece, while an approval of expansion (two additional servers) was made on 23 January 2024 (evidence 11). The selected contractor was announced on the website of the Bank of Greece on 23 October 2023 (evidence 12). The Commission services accessed the link provided by the authorities on 18 July 2025 to verify the abovementioned notification of award of contract. This check was completed successfully, confirming that the award of contract was successfully announced on 23 October 2023.

This is in line with the internal ‘Policy and Guidelines of Procurements’ document of the Bank of Greece for the procurement of services and goods, as the Bank of Greece is not subject to the Public Procurement Law. The open tenders of the Bank of Greece are conducted through the CosmoONE platform (<https://www.marketsite.gr>). Upon completion of an open tender, the procedure includes the publication of the selected contractor on the Bank of Greece website, as outlined in the Bank’s policy and guidelines’ document (evidence 14, page 15).

The tender for the “Supply of equipment and software for the needs of the information technology department” by Bank of Greece for Oracle licenses was declared void (evidence 11, 12). Subsequently,

direct negotiations took place between the Bank of Greece and Oracle. The project for the supply of ORACLE software was awarded on 13 December 2023 by the Committee for Works and Procurement Contracts of the Bank of Greece (evidence 11), and the contractor was notified via electronic correspondence on 21 December 2023 (evidence 13) according to the 'Policy and Guidelines of Procurements' of the Bank of Greece. In cases of direct negotiations, there is no obligation to publish these details on the Bank's website (evidence 14, page 17).

#### **Award of the contract for the development of the Central Credit Registry - Expansion of backup infrastructure to support the operation of the Greek CCR**

The call for the tender was published by Bank of Greece on 10 January 2024 (evidence 15). The Commission services accessed the link provided by the authorities on 18 July 2025 to verify the abovementioned launch of the call for tenders. This check was completed successfully, confirming that the tender was launched on 10 January 2024.

The contract award is fulfilled through an open tender process and was awarded on 02 July 2024 by the Committee for Works and Procurement Contracts of the Bank of Greece, (evidence 11). The award decision notification was announced on the website of the Bank of Greece to the tenderers on 15 July 2024 (evidence 16). The Commission services accessed the link provided by the authorities on 18 July 2025 to verify the abovementioned notification of award of contract. This check was completed successfully, confirming that the award of contract was successfully announced on 15 July 2024.

#### **Award of the contract for the development of the Central Credit Registry - Implementation of the CCR Portal (Unclassified Environment and Classified Environment)**

Greece provided evidence that the implementation of the CCR Portal (Unclassified and Classified Environment) has been awarded through an established framework agreement with the Bank of Greece and the contractor on 26 March 2022 (evidence 17). In accordance with the framework agreement, the Information Systems Directorate officially invited the contractor on 12 December 2022 to submit a technical proposal for the Unclassified and Classified Environment of the CCR Portal (evidence 18). The contractor submitted their technical offer on 20 June 2023 for the Unclassified Environment (evidence 19). The proposal was approved by the Bank of Greece's General Director of Operations on 07 July 2023, as illustrated in the minutes of the Procurement Unit to the Committee for Works and Procurement Contracts (evidence 21), following an evaluation by the IT Department of Bank of Greece (evidence 22). The contractor was notified via electronic correspondence on 10 July 2023 (evidence 23), in line with the 'Policy and Guidelines of Procurements' (evidence 14, page 17). For the Classified Environment, the contractor submitted their technical offer on 26 March 2024 (evidence 20). The proposal was accepted by the Committee for Works and Procurement Contracts of the Bank of Greece on 27 March 2024 (evidence 21). The contractor was notified via electronic correspondence on 28 March 2024 (evidence 24), in line with the 'Policy and Guidelines of Procurements' (evidence 14, page 17).

#### **Award of the contract for the development of the Central Credit Registry - Data Protection Impact Assessment (DPIA) and Algorithmic Impact Assessment (AIA) for the CCR**

In line with Law 4972/2022 (evidence 2), which designates the Bank of Greece as the data controller, responsible for personal data management in compliance with GDPR for the CCR, the Bank of Greece entered into a framework agreement on 26 June 2023 (evidence 25). This agreement encompasses a Data Protection Impact Assessment (DPIA) in line with the General Data Protection Regulation (GDPR), as well as an Algorithmic Impact Assessment. The contractor was notified via electronic

correspondence on 11 March 2023, which is represented in Annex A of the agreement (evidence 25, pages 13-16).

Furthermore, in line with the description of the measure, The CCR shall be hosted by the Bank of Greece and it shall record the payment history of each loan of the customers and the types of collateral provided. Greece has provided Article 111 of Law 4972/2022 (evidence 2), which stipulates that the CCR is established, and that the registry belongs to and is operated by the Bank of Greece, as mentioned above. Article 112, paragraph 1 of Law 4972/2022 (evidence 2) mentions that the CCR records in detail the payment history of each loan and the types of collateral provided.

Furthermore, in line with the description of the measure, the CCR, through the collection of relevant data shall also contribute to the operation and functions of the Credit Expansion Observatory for the monitoring of the evolution of credit expansion. Greece provided Article 121 Law 4972/2022 (evidence 2), which) mentions that the CCR interoperates with and exchanges information with databases of the public sector, private entities, or credit rating agencies, as well as with any other electronic system of a public or other entity, or with competent authorities, for the purpose of providing information within the framework of conducting economic analyses or statistical studies based on the data it maintains. Consequently, based on the provisions of the aforementioned Article, the data provided by the CCR that will tackle the volume, frequency, and type of credit issued will contribute to operations and functions of the Credit Expansion Observatory and the monitoring of credit expansion.

Furthermore, in line with the description of the measure, the CCR shall enable access to credit information, tackling market failures due to asymmetric information, thus facilitating access to credit. Article 111 of Law 4972/2022 (evidence 2) mentions that the purpose of the CCR is to enhance the financing of the real economy by the Greek financial system and to safeguard financial stability, through the improvement of the information provided, the more rational assessment of the creditworthiness of potential borrowers. These provisions under the aforementioned Article enable the access to credit information, thus tackling market failures due to asymmetric information and facilitating access to credit.

#### **4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 247 Contracts award for Research Centres - construction works

**Related Measure:** 4,5.16624 Creation-Expansion–Upgrade of Infrastructures of Research Centers supervised by the General Secretariat for Research and Innovation (GSRI)

**Qualitative Indicator:** Notification of award of contracts for construction works

**Time:** Q1 2024

### 1. Context:

The investment comprises an infrastructure and / or equipment upgrade of 11 research centres, in order to enhance their research capacity and capabilities in important scientific and technological areas. In particular, the investment concerns the following research centres: Foundation for Research and Technology Hellas; Athena Research and Innovation Centre; BSRC Fleming; Centre for Research and Technology Hellas; National Hellenic Research Foundation; Biomedical Research Foundation Academy of Athens; National Observatory of Athens; Hellenic Centre for Marine Research; Hellenic Pasteur Institute; National Centre of Social Research; Greek Atomic Energy Commission.

Milestone 247 requires the notification of award of contracts for construction works concerning the following Research Centres: Foundation for Research and Technology Hellas; Athena Research and Innovation Centre; BSRC Fleming; Centre for Research and Technology Hellas; National Hellenic Research Foundation; Biomedical Research Foundation Academy of Athens; National Observatory of Athens; Hellenic Centre for Marine Research; Hellenic Pasteur Institute.

Milestone 247 is the second milestone of the investment, and it follows the completion of milestone 246. It will be followed by: (i) milestone 247a related to the notification of award of contracts for equipment and building purchases; and (ii) milestone 249 related to the completion of all sub-projects under the measure. The investment has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                   |
|---|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                     |
| 2 | Request for proposals number 148371/ 25.07.2024 - Foundation for Research and Technology Hellas                                | Copy of request for proposals for the Foundation for Research and Technology Hellas - Subproject 'Innovative Green Energy Transition Facility (Patras)'             |
| 3 | Decision of award of contract number 545/43-6/22.10.2024 - Foundation for Research and Technology - Hellas                     | Copy of decision of award of contract for the Foundation for Research and Technology Hellas - Subproject 'Innovative Green Energy Transition Facility (Patras)'     |
| 4 | Notification of award of contract number 208717, 30.10.2024 - Foundation                                                       | Copy of notification of award of contract for the Foundation for Research and Technology Hellas - Subproject 'Innovative Green Energy Transition Facility (Patras)' |

|    |                                                                                                                            |                                                                                                                                                                                                                                                                                   |
|----|----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | for Research and Technology - Hellas                                                                                       |                                                                                                                                                                                                                                                                                   |
| 5  | Request for proposals number 123790/31.10.2023 - Foundation for Research and Technology Hellas                             | Copy of request for proposals for the Foundation for Research and Technology Hellas - Subproject 'Research and Innovation Infrastructure (Ioannina)'                                                                                                                              |
| 6  | Decision of award of contract number 526/42-6/27.2.2024 - Foundation for Research and Technology - Hellas                  | Copy of decision of award of contract for the Foundation for Research and Technology Hellas - Subproject 'Research and Innovation Infrastructure (Ioannina)'                                                                                                                      |
| 7  | Notification of award of contract number 204346, 28.02.2024 - Foundation for Research and Technology - Hellas              | Copy of notification of award of contract for the Foundation for Research and Technology Hellas - Subproject 'Research and Innovation Infrastructure (Ioannina)'                                                                                                                  |
| 8  | Request for proposals number 124817 / 10.11.2023 - Foundation for Research and Technology Hellas                           | Copy of request for proposals for the Foundation for Research and Technology Hellas - Subprojects 'Innovation and Advanced Education Hub (Heraklion)' and 'Expansion of the building infrastructure of the Institute of Mediterranean Studies (Rethymno)'                         |
| 9  | Decisions of award of contracts number 526/42-6/27.2.2024 (topics 1 and 2) - Foundation for Research and Technology Hellas | Copies of decisions of award of contracts for the Foundation for Research and Technology Hellas - Subprojects 'Innovation and Advanced Education Hub (Heraklion)' and 'Expansion of the building infrastructure of the Institute of Mediterranean Studies (Rethymno)'             |
| 10 | Notifications of award of contracts numbers 204349 and 204350, 28.02.2024 - Foundation for Research and Technology Hellas  | Copies of notifications of award of contracts numbers for the Foundation for Research and Technology Hellas - Subprojects 'Innovation and Advanced Education Hub (Heraklion)' and 'Expansion of the building infrastructure of the Institute of Mediterranean Studies (Rethymno)' |
| 11 | Request for proposals number 124219 / 03.11.2023 - Foundation for Research and Technology Hellas                           | Copy of request for proposals for the Foundation for Research and Technology Hellas - Subproject 'Sustainable Energy Transition Research and Innovation Center (Chania)'                                                                                                          |
| 12 | Decision of award of contract number 528/42-6/15.3.2024 - Foundation for Research and Technology Hellas                    | Copy of decision of award of contract for the Foundation for Research and Technology Hellas - Subproject 'Sustainable Energy Transition Research and Innovation Center (Chania)'                                                                                                  |
| 13 | Notification of award of contract number 204347, 15.03.2024 - Foundation for Research and Technology Hellas                | Copy of notification of award of contract for the Foundation for Research and Technology Hellas - Subproject 'Sustainable Energy Transition Research and Innovation Center (Chania)'                                                                                              |

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| 14 | Request for proposals number ΣΑΤΑ ΤΑ019, ΣΑΕ 013/2, 13.11.2023 - Athena Research and Innovation Centre       | Copy of request for proposals for the Athena Research and Innovation Centre - Subproject 'Upgrading and remodeling of Athena building in Athens'                                       |
| 15 | Decision of award of contract number ΑΔΑ: ΨΟΘ546ΜΩΝ1-ΟΥ4, 06.03.2024 - Athena Research and Innovation Centre | Copy of decision of award of contract for the Athena Research and Innovation Centre - Subproject 'Upgrading and remodeling of Athena building in Athens'                               |
| 16 | Notification of award of contract number 204571, 06.03.2024 - Athena Research and Innovation Centre          | Copy of notification of award of contract for the Athena Research and Innovation Centre - Subproject 'Upgrading and remodeling of Athena building in Athens'                           |
| 17 | Request for proposals number ΣΑΤΑ ΤΑ019, ΣΑΕ 013/2, 14.10.2024 - Athena Research and Innovation Centre       | Copy of request for proposals for the Athena Research and Innovation Centre - Subproject 'Reconstruction of the neoclassical building of Athena in the old town of Xanthi'             |
| 18 | Decision of award of contract number ΑΔΑ: 966Λ46ΝΩΑ7-ΝΑΟ, 24.01.2025 - Athena Research and Innovation Centre | Copy of decision of award of contract for the Athena Research and Innovation Centre - Subproject 'Reconstruction of the neoclassical building of Athena in the old town of Xanthi'     |
| 19 | Notification of award of contract number 210156, 24.01.2025 - Athena Research and Innovation Centre          | Copy of notification of award of contract for the Athena Research and Innovation Centre - Subproject 'Reconstruction of the neoclassical building of Athena in the old town of Xanthi' |
| 20 | Request for proposals number ΣΑΤΑ ΤΑ019, ΣΑΕ 013/2, 15.10.2024 - Athena Research and Innovation Centre       | Copy of request for proposals for the Athena Research and Innovation Centre - Subproject 'Development of the surrounding area at Athena building in Xanthi'                            |
| 21 | Decision of award of contract number ΑΔΑ: 9ΘΣΒ46ΝΩΑ7-ΔΗΖ, 19.02.2025 - Athena Research and Innovation Centre | Copy of decision of award of contract for the Athena Research and Innovation Centre - Subproject 'Development of the surrounding area at Athena building in Xanthi'                    |
| 22 | Notification of award of contract number 210155, 19.02.2025 - Athena Research and Innovation Centre          | Copy of notification of award of contract for the Athena Research and Innovation Centre - Subproject 'Development of the surrounding area at Athena building in Xanthi'                |

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| 23 | Request for proposals number 9108, 16.06.2023 - BSRC Fleming                                                                         | Copy of request for proposals for the BSRC Fleming - Subproject 'Upgrade of existing building and infrastructure'                                              |
| 24 | Decision of award of contract number ΑΔΑ: 9Θ8ΝΟΞΧΔ-ΑΥ2, 19.07.2024 - BSRC Fleming                                                    | Copy of decision of award of contract for the BSRC Fleming - Subproject 'Upgrade of existing building and infrastructure'                                      |
| 25 | Notification of award of contract number 199373, 22.07.2024 - BSRC Fleming                                                           | Copy of notification of award of contract for the BSRC Fleming - Subproject 'Upgrade of existing building and infrastructure'                                  |
| 26 | Request for proposals number ΣΑΤΑ ΤΑ019-2023ΤΑ01900017, ΠΔΕ 2023ΣΕ01320003, 09.11.2023 - Centre for Research and Technology Hellas   | Copy of request for proposals for the Centre for Research and Technology Hellas - Subproject 'CERTH Central Facilities (Thessaloniki)'                         |
| 27 | Decision of award of contract number ΔΓ-00-622/20.02.2024 - Centre for Research and Technology Hellas                                | Copy of decision of award of contract for the Centre for Research and Technology Hellas - Subproject 'CERTH Central Facilities (Thessaloniki)'                 |
| 28 | Notification of award of contract number 204292, 20.02.2024 - Centre for Research and Technology Hellas                              | Copy of notification of award of contract for the Centre for Research and Technology Hellas - Subproject 'CERTH Central Facilities (Thessaloniki)'             |
| 29 | Request for proposals number ΣΑΤΑ ΤΑ019 - 2023ΤΑ01900017, ΠΔΕ 2023ΣΕ01320003, 09.11.2023 - Centre for Research and Technology Hellas | Copy of request for proposals for the Centre for Research and Technology Hellas - Subproject 'Construction of building - AI Nucleus (Technopolis)'             |
| 30 | Decision of award of contract number ΔΓ-00-620/20.02.2024 - Centre for Research and Technology Hellas                                | Copy of decision of award of contract for the Centre for Research and Technology Hellas - Subproject 'Construction of building - AI Nucleus (Technopolis)'     |
| 31 | Notification of award of contract number 200970, 20.02.2024 - Centre for Research and Technology Hellas                              | Copy of notification of award of contract for the Centre for Research and Technology Hellas - Subproject 'Construction of building - AI Nucleus (Technopolis)' |
| 32 | Request for proposals ΣΑΤΑ ΤΑ019 - 2023ΤΑ01900017, ΠΔΕ 2023ΣΕ01320003, 14.11.2023 - Centre for                                       | Copy of request for proposals for the Centre for Research and Technology Hellas - Subproject 'Construction of building - The Factory'                          |

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|    | Research and Technology Hellas                                                                                                       |                                                                                                                                                                                   |
| 33 | Decision of award of contract number ΔΓ-00-621/29.02.2024 - Centre for Research and Technology Hellas                                | Copy of decision of award of contract for the Centre for Research and Technology Hellas - Subproject 'Construction of building - The Factory'                                     |
| 34 | Notification of award of contract number 204293, 29.02.2024 - Centre for Research and Technology Hellas                              | Copy of notification of award of contract for the Centre for Research and Technology Hellas - Subproject 'Construction of building - The Factory'                                 |
| 35 | Request for proposals number ΣΑΤΑ ΤΑ019 - 2023ΤΑ01900017, ΠΔΕ 2023ΣΕ01320003, 10.11.2023 - Centre for Research and Technology Hellas | Copy of request for proposals for the Centre for Research and Technology Hellas - Subproject 'Construction of building - IBO-HIVE'                                                |
| 36 | Decision of award of contract number ΔΓ-00-623/28.02.2024 - Centre for Research and Technology Hellas                                | Copy of decision of award of contract for the Centre for Research and Technology Hellas - Subproject 'Construction of building - IBO-HIVE'                                        |
| 37 | Notification of award of contract number 204289, 28.02.2024 - Centre for Research and Technology Hellas                              | Copy of notification of award of contract for the Centre for Research and Technology Hellas - Subproject 'Construction of building - IBO-HIVE'                                    |
| 38 | Request for proposals number ΣΑΤΑ: ΤΑ019, ΣΑΕ: 013/2, 08.12.2023 - National Hellenic Research Foundation                             | Copy of request for proposals for the National Hellenic Research Foundation - 'Upgrading and remodeling of the building of the National Hellenic Research Foundation'             |
| 39 | Decision of award of contract number ΑΔΑ: ΨΜΩ446ΜΩΝ1-ΞΤΠ, 27.03.2024 - National Hellenic Research Foundation                         | Copy of decision of award of contract for the National Hellenic Research Foundation - 'Upgrading and remodeling of the building of the National Hellenic Research Foundation'     |
| 40 | Notification of award of contract number 204570, 27.03.2024 - National Hellenic Research Foundation                                  | Copy of notification of award of contract for the National Hellenic Research Foundation - 'Upgrading and remodeling of the building of the National Hellenic Research Foundation' |
| 41 | Request for proposals number ΣΑΤΑ: ΤΑ019, ΣΑΕ: 013/2, 14.05.2024 - Biomedical Research                                               | Copy of request for proposals for the Biomedical Research Foundation Academy of Athens - Subproject 'Construction of biosecurity and radio-genomic units'                         |

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|    | Foundation Academy of Athens                                                                                            |                                                                                                                                                                                                  |
| 42 | Decision of award of contract number ΑΔΑ: ΨΛΞΥ46ΜΩΝ1-ΘΩΛ, 06.08.2024 - Biomedical Research Foundation Academy of Athens | Copy of decision of award of contract for the Biomedical Research Foundation Academy of Athens - Subproject 'Construction of biosecurity and radio-genomic units'                                |
| 43 | Notification of award of contract number 207614, 06.08.2024 - Biomedical Research Foundation Academy of Athens          | Copy of notification of award of contract for the Biomedical Research Foundation Academy of Athens - Subproject 'Construction of biosecurity and radio-genomic units'                            |
| 44 | Request for proposals number 1033, 12.01.2024 - National Observatory of Athens                                          | Copy of request for proposals for the National Observatory of Athens - Subproject 'PANGAEA building facilities'                                                                                  |
| 45 | Decision of award of contract number 1306, 08.03.2024 - National Observatory of Athens                                  | Copy of decision of award of contract for the National Observatory of Athens - Subproject 'PANGAEA building facilities'                                                                          |
| 46 | Notification of award of contract number 205217, 11.03.2024 - National Observatory of Athens                            | Copy of notification of award of contract for the National Observatory of Athens - Subproject 'PANGAEA building facilities'                                                                      |
| 47 | Request for proposals number ΣΑΤΑ ΤΑ019, 2023ΤΑ01900003 5174782, 19.10.2023 - Hellenic Centre for Marine Research       | Copy of request for proposals for the Hellenic Centre for Marine Research - Subproject 'Construction of an office / laboratory building in Anavyssos'                                            |
| 48 | Decision of award of contract number 400/2024-114, 06.03.2024 - Hellenic Centre for Marine Research                     | Copy of decision of award of contract for the Hellenic Centre for Marine Research - Subproject 'Construction of an office / laboratory building in Anavyssos'                                    |
| 49 | Notification of award of contract number 204125, 07.03.2024 - Hellenic Centre for Marine Research                       | Copy of notification of award of contract for the Hellenic Centre for Marine Research - Subproject 'Construction of an office / laboratory building in Anavyssos'                                |
| 50 | Request for proposals number ΣΑΤΑ ΤΑ019, 18.10.2023 - Hellenic Centre for Marine Research                               | Copy of request for proposals for the Hellenic Centre for Marine Research - Subproject 'Construction - expansion - upgrading of the Hellenic Centre for Marine Research infrastructure in Crete' |
| 51 | Decision of award of contract number ΑΔΑ: 6Σ1Μ46ΜΩΝ1-4ΦΒ,                                                               | Copy of decision of award of contract for the Hellenic Centre for Marine Research - Subproject 'Construction - expansion -                                                                       |

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|    | 07.02.2024 - Hellenic Centre for Marine Research                                                  | upgrading of the Hellenic Centre for Marine Research infrastructure in Crete'                                                                                                                                                      |
| 52 | Notification of award of contract number 203787, 07.02.2024 - Hellenic Centre for Marine Research | Copy of notification of award of contract for the Hellenic Centre for Marine Research - Subproject 'Construction - expansion - upgrading of the Hellenic Centre for Marine Research infrastructure in Crete'                       |
| 53 | Request for proposals number 19258, 20.12.2023 - Hellenic Pasteur Institute                       | Copy of request for proposals for the Hellenic Pasteur Institute - Subproject 'Construction of two new buildings'                                                                                                                  |
| 54 | Decision of award of contract number ΑΔΑ: ΠΜ6ΔΟΞΧΔ-ΒΝΣ, 21.11.2024 - Hellenic Pasteur Institute   | Copy of decision of award of contract for the Hellenic Pasteur Institute - Subproject 'Construction of two new buildings'                                                                                                          |
| 55 | Notification of award of contract number 203311, 22.11.2024 - Hellenic Pasteur Institute          | Copy of notification of award of contract for the Hellenic Pasteur Institute - Subproject 'Construction of two new buildings'                                                                                                      |
| 56 | List of contracts                                                                                 | Excel file including a list with: (i) the requests for proposals for construction works; (ii) the decisions of award of contracts for construction works; and (iii) the notifications of award of contracts for construction works |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Notification of award of contracts for construction works concerning the following research centres: Foundation for Research and Technology Hellas; Athena Research and Innovation Centre; BSRC Fleming; Centre for Research and Technology Hellas; National Hellenic Research Foundation; Biomedical Research Foundation Academy of Athens; National Observatory of Athens; Hellenic Centre for Marine Research; Hellenic Pasteur Institute**

The notification of award of contracts related to the research centres included in the milestone is demonstrated by evidence 2 through 55. For each of the subprojects concerning the construction works implemented by the aforementioned research centres, Greek authorities submitted: (i) the requests for proposals; (ii) the decisions of award of contracts; and (iii) the notifications of award of contracts. Moreover, Greek authorities submitted an excel file including a list of the documentary evidence (evidence 56).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 248 Contracts award for TH<sup>2</sup>ORAX

**Related Measure:** 4,5.16654 TH<sup>2</sup>ORAX: Trellis Holistic & Hybrid Operational Ruggedized Autonomous eXemplary system

**Qualitative Indicator:** Notification of award of contracts

**Time:** Q2 2024

#### 1. Context:

The TH<sup>2</sup>ORAX investment foresees the development of a “next generation” information system, which is expected to combine different types and forms of collaborative infrastructures to enhance institutions’ decision-making in real time with a view to contributing to border management, fight against crime and terrorism, cybersecurity, critical infrastructure protection and resilience, search and rescue and disaster resilience.

Milestone 248 requires the notification of award of contracts for the TH<sup>2</sup>ORAX project.

Milestone 248 is the first step of the implementation of the investment. It will be followed by milestone 251, part of the 9<sup>th</sup> payment request, which foresees the completion of the project.

#### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                | Short description                                                                                                                                                                                                                                                                                                                                                                                |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                      |                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2 | Formal Declaration of 25 June 2025 for confidentiality signed by the Deputy Head of the Directorate for Research and Innovation Actions Support (Protocol Number: 49554/25-06-2025) | Formal declaration that the tender documents are classified and cannot be digitally uploaded                                                                                                                                                                                                                                                                                                     |
| 3 | Decision by the Ministry of Development of 8 February 2022, ΑΔΑ: Ψ44Ρ46ΜΤΛΡ-ΠΩΕ (Protocol number: 13247/08-02-2022)                                                                 | Decision by the Ministry of Development of regarding the “Designation of the General Secretariat for Research and Innovation (GSRI) and the Hellenic National Defence General Staff (HNDGS – Third Branch) as Implementing and Operating Bodies for the Measures and Projects of the Recovery and Resilience Facility, under the responsibility of the Ministry of Development and Investments.” |
| 4 | Decision by the General Secretariat for Research and Innovation (GSRI) of 28 November 2023, ΑΔΑ: 9ΕΒΨ46ΝΛΣΞ-ΘΘΚ (Protocol Number: 112562/28-11-2023)                                | Decision by the GSRI for the Establishment and Formation of a Committee for the Conduct of an international, electronic, restricted public tender for the project 'THORAX – Scalable Holistic Hybrid Operational Autonomous System,' which has been included in the Recovery and Resilience Facility                                                                                             |
| 5 | Call for Expression of Interest published on 19 October 2023 ADAM: 23PROC013642883 2023-10-25 (Protocol Number: 98245 - 24-10-2023)                                                 | Call for expression of interest for the preselection of candidates within the framework of Phase A of an international, electronic, restricted tender for the                                                                                                                                                                                                                                    |

|   |                                                                                                                                                                                                                                   |                                                                                                                                                                                |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                                                   | selection of the contractor for the project “THORAX – Scalable Holistic Hybrid Operational Autonomous System”                                                                  |
| 6 | Approval of the Minutes of the Evaluation Committee of 5 March 2024 ADA: ΨΘΓΠ46ΝΑΣΞ-ΑΚΟ (Protocol Number: 18920/05-03-2024)                                                                                                       | Approval of the Minutes of the Committee for the Conduct of an International, Electronic, Restricted Public Tender, regarding the short list of bidders (preselection process) |
| 7 | Decision of contract award of 16 September 2024 by the Deputy Minister for Development ADAM:24AWRD015460653 2024-09-20 ADA: ΠΠ3Γ46ΝΑΣΞ-ΙΔ8 (Protocol Number: 63329/08-08-2024, Corrected Reissuance: 63329/08-08-2024/16.09.2024) | Approval of the Minutes of the Evaluation Committee and final award of the tender                                                                                              |
| 8 | Printout from ESIDIS with unique tender ID 248264 notifying participants on the decision of contract award                                                                                                                        | Notification of Contract Award                                                                                                                                                 |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

#### Award of contracts for TH<sup>2</sup>ORAX project.

Greece provided a formal declaration by the Deputy Head of the Directorate for Research and Innovation Actions Support dated 25 June 2025 indicating that, since the tender for the TH<sup>2</sup>ORAX project was conducted through the restricted procedure foreseen under Article 28 of Law 4412/2016 on public procurement, the associated documents are classified and confidential and could not be provided to the Commission (evidence 2).

On this basis, on 11 September 2025 the Commission conducted a virtual on-the-spot check to access and examine these documents. During this virtual on-the-spot check, the following documents were in particular examined by the Commission services: (i) a printout from the National System of Electronic Public Procurement (ESIDIS) with unique tender ID 248264 and (ii) the notice of electronic public tender under the restricted procedure above the threshold within the framework of Phase B: “Award – Invitation to Submit Offers” for the Conclusion of the Contract: “*THORAX – Scalable Holistic Hybrid Operational Autonomous System*” dated 11 April 2024. The virtual on-the-spot check was completed successfully, confirming that the tender specifications were in line with requirements of the measure in the CID Annex (see the analysis further below).

To demonstrate that, following the tender procedure, the contracts were awarded, Greece also provided the decision of 16 September 2024 by the Deputy Minister for Development approving the minutes of the Evaluation Committee and the final award of the tender for the TH<sup>2</sup>ORAX project (evidence 7). Finally, to demonstrate the notification of the award, Greece also provided as a printout from ESIDIS with unique tender ID 248264 showing that on 20 September 2024 participants were notified on the decision of contract award (evidence 8).

**The Ministry of Development and Investments along with the General Secretariat for Research & Innovation (GSRI) shall be responsible for the effective implementation of the evaluation process.**

Greece provided evidence that the General Secretariat of Research and Innovation (GSRI) under the Ministry of Development was entrusted with the responsibility of the effective implementation of the

evaluation process for the TH<sup>2</sup>ORAX project. Specifically, Greece provided a decision by the Ministry of Development dated 8 February 2022 (evidence 3) which designates the General Secretariat for Research and Innovation (GSRI) and the Hellenic National Defence General Staff (HNDGS – Third Branch) as project implementing bodies for the TH<sup>2</sup>ORAX project. On the basis of this decision, the GSRI adopted all legal acts related to the implementation of the evaluation process.

**The contract(s) shall be awarded based on the Best Price Quality Ratio.**

During the virtual on-the-spot check conducted by the Commission on 11 September 2025, the authorities displayed the content of the confidential notice of electronic public tender under the restricted procedure above the threshold within the framework of Phase B: "Award – Invitation to Submit Offers" for the Conclusion of the Contract: *"THORAX – Scalable Holistic Hybrid Operational Autonomous System"*. The award criteria contained on page 1 of the notice clearly indicate that the contracts are meant to be awarded based on: *"...the most economically advantageous tender (MEAT) on the basis of the best price-quality ratio."* In addition, section 2.3.1 on pages 38-41 entitled *"Award Criteria"* presents more in detail the evaluation criteria and the weights used for the purpose of the evaluation process for the technical proposals of the bidders.

Furthermore, in line with the description of the measure, **the system shall be composed of state-of-the-art technologies, such as artificial intelligence**

During the virtual on-the-spot check conducted on 11 September 2025, the authorities displayed the content of the confidential notice of electronic public tender for the TH<sup>2</sup>ORAX project. Section 1.3.1. on page 8 of the notice of public tender, entitled *"Brief description of the physical scope of the project"* indicates artificial intelligence as part of the state-of-the-art technologies composing the TH<sup>2</sup>ORAX system. In addition, Annex I of the notice and specifically Section 2.2.2.4 on page 117, point 6, refers to a "Decision Support Subsystem (DSS)" while Section 2.2.2.5 on page 118, refers to a "Cybersecurity subsystem" as part of the TH<sup>2</sup>ORAX project.

Furthermore, in line with the description of the measure, **and shall be designed to meet the needs of a diverse range of end users on a long-term basis.**

Section 1.3.1 on page 8 of the notice of public tender, entitled *"Brief description of the physical scope of the project"* indicates that *"...The system will be designed to meet the needs of a wide range of end-users on a long-term basis..."*.

In addition, Annex I, Section 1.2, on pages 79-84 of the notice of public tender, entitled *"Stakeholders"*, presents the various users of the TH<sup>2</sup>ORAX system and, in particular:

- the Ministry of National Defence, under which the following bodies are involved:
  - o Hellenic National Defence General Staff (HNDGS)
  - o Hellenic Army General Staff (HAGS)
  - o Hellenic Navy General Staff (HNGS)
  - o Hellenic Air Force General Staff (HAFGS)
  - o Hellenic National Meteorological Service (HNMS)
- the Ministry of Citizen Protection
- the Ministry of Climate Crisis and Civil Protection under which the National Crisis and Hazard Management Mechanism (Nat-CHAMM) will be involved.

**4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 258 Contract award for road safety – all contracts

**Related Measure:** 4,6.16631 Road Safety Upgrade

**Qualitative Indicator:** Notification of award of 100% of contracts

**Time:** Q2 2024

### 1. Context:

The investment comprises improvements in road safety across the country. The investment is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU.

The milestone consists of the award of the remaining contracts for improvement of the road safety on at least 7 780 dangerous locations in total, and the award of contracts for smart led lighting infrastructure for 31 938 poles.

Milestone 258 is the second milestone of the investment, and it follows the completion of milestone 257. It will be followed by milestone 259, related to the completion of the investment. The investment has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                                                                                                         |
|---|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                                                                                                           |
| 2 | List of dangerous locations                                                                                                    | A list of 6525 dangerous locations covered by 135 awarded contracts. The list excluded locations under contracts which had been positively assessed under the previous Milestone 257. The list contains unique identifiers for 6525 locations. On the basis of this list, a randomly selected sample of 60 dangerous locations was drawn. |
| 3 | A randomly selected sample of sixty (60) dangerous locations                                                                   | Selected from the list of dangerous locations (evidence 2)                                                                                                                                                                                                                                                                                |
| 4 | Copies of decisions of contract award for a randomly selected sample of sixty (60) dangerous locations                         | Copies of decisions of contract award issued by the contracting authorities for the approval of the minutes of the evaluation committees and selection of the preferred bidder to carry out the interventions procured                                                                                                                    |
| 5 | Contract award notifications for a randomly selected sample of sixty (60) dangerous locations                                  | Copies of entries of the contract award decisions above (4) in the central electronic registry of public contracts platform                                                                                                                                                                                                               |
| 6 | Copies of Requests for Proposals and technical reports for a randomly selected sample of sixty (60) dangerous locations        | Copies of Requests for Proposals and technical reports which form part of contractual documentation and list the dangerous locations where the interventions to improve road safety were procured.                                                                                                                                        |
| 7 | Law no. 4014 of 21 September 2011 (Government Gazette, Series I, No                                                            | A copy of the national law regarding the categorization of projects and activities that require environmental permits and activities,                                                                                                                                                                                                     |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                 |
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|    | 209) on “Environmental licensing of projects”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | regulation of planning violations in conjunction with the establishment of an environmental balance and other provisions within the remit of the Ministry of the Environment”.  |
| 8  | Ministerial Decision No ΥΠΕΝ/ΔΙΠΑ/17185/1069 of 24 February 2022 (Government Gazette, Series II, No 841) on ‘Amendment and codification of Ministerial Decision 1958/2012 – Classification of single and private projects and activities into categories and subcategories in accordance with Article 1 (209) of Law 4014/21.9.2011 (GG I 2471), as amended and in force’                                                                                                                                                                            | A copy of the Ministerial Decision specifying the works related to each category listed in Law no. 4014 of 21 September 2011 and the licensing required                         |
| 9  | Circular No. ΥΠΕΝ/ΔΙΠΑ/26465/1738 of 17 March 2022(Ref.: ADA: ΨΙΥ94653Π8-ΔΧΤ) of the Ministry of the Environment and Energy on “Clarifications on the environmental authorization of urban regeneration projects”                                                                                                                                                                                                                                                                                                                                    | A copy of the circular which clarifies what type of urban regeneration interventions do not require environmental permit in accordance with the applicable national legislation |
| 10 | Joint Decision of the Director-General for Spatial, Environmental and Rural Affairs of the Decentralised Aegean Administration Policy and the Aegean Forest Policy Inspectorate of the Ministry of the Environment and Energy dated 12 February 2024 “Amendment to Decision approving environmental conditions (DAEC) for the project: ‘Improvement of road safety in the Regional Road of Naples – Pelopi’, in the Regional Unit of Agia Paraskevi and Mandadiou, Municipality of Western Lesvos, Regional Unit of Lesbos, Region of North Aegean’. | Decision Approving Environmental Conditions (DAEC) issued by the Region of North Aegean                                                                                         |
| 11 | Decision no. 89773/1664 for Inclusion in Standard Environmental Commitments issued by the Region of Peloponnese, dated 19 June 2019                                                                                                                                                                                                                                                                                                                                                                                                                  | Decision stating that the project is subject to Standard Environmental Commitments (SEC)                                                                                        |
| 12 | Contract award decision no. 41724 of 29 October 2024 for the award of the 1st executive contract for the                                                                                                                                                                                                                                                                                                                                                                                                                                             | Copy of the contract award decision for the installation of smart led lighting infrastructure for 31 938 poles                                                                  |

|    |                                                                                                                                                                          |                                                                                                                |
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|    | sub-project 'Development of Autonomous Smart Remote Network of LEDs in the Road Axes of the Country' under a Framework Agreement                                         |                                                                                                                |
| 13 | 1st executive contract (reference no. 9341) of 5 March 2025 for the sub-project 'Development of Autonomous Smart Remote Network of LEDs in the Road Axes of the Country' | Copy of the implementation contract for the installation of smart led lighting infrastructure for 31 938 poles |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

#### **Contracts awarded for a) improvement of the road safety on at least 7 780 dangerous locations**

Under the previous milestone 257 twenty-four (24) decisions of contract award issued by regions and municipalities concerning 2411 dangerous locations (thus exceeding the requirement of at least 2300 locations under milestone 257) were satisfactorily assessed. Following the Commission's assessment and payment, the implementation of the measure was subsequently monitored by the Financial Audit Committee (hereinafter referred to as "EDEL"), the Greek Audit Authority for EU funds. The results of EDEL's ex-post audit indicated that, out of 2411 dangerous locations, only 2305 were eligible. These audit findings do not affect the satisfactory fulfilment of milestone 257, as the requirement of at least 2300 locations has nevertheless been exceeded. The contracts analysed under milestone 258 cover 6525 dangerous locations. Taken together with 2305 eligible locations under the previous milestone 257, the overall target of 7780 dangerous locations has been exceeded. The current analysis concerns only contracts awarded for the remaining 6525 dangerous locations out of the total of 7780 under point a) of the milestone.

Following the selection of a random sample of 60 units, Greece submitted: copies of Requests for Proposals and technical reports (evidence 6) which demonstrate that the sampled units are indeed listed under the relevant contractual documents, copies of decisions of contract award issued by the contracting authorities (evidence 4) demonstrating that the contracts had been awarded and concern road safety improvements in dangerous locations, and proofs of entry of the contract award decisions in the central electronic registry of public contracts platform (evidence 5) demonstrating that the contract award decisions were notified to the bidders. The evidence provided for a sample of 60 units confirmed that the requirements of the milestone have been met.

Furthermore, in line with the description of the measure, **the measure is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU, to ensure compliance with the Do No Significant Harm principle is integrated into the project and strictly complied with at the stages of construction, operation and decommissioning of the infrastructure.**

Greece submitted as evidence a copy of the law on environmental licencing of projects, a ministerial decision and a circular specifying the law (evidence 7-9) which demonstrate that the interventions comply with the national legislation as regards the Environmental Impact Assessment. In most cases the respective activities and works have minimum environmental impact, and therefore no environmental permits are required in accordance with the applicable national legislation above, and as further explained in Circular ΥΠΕΝ/ΔΙΠΑ/26465/1738 of 17 March 2022 by the Ministry of the

Environment and Energy (evidence 9). For two units in the sample, the contracts concern a procurement of equipment for road safety and thus environmental licensing is not applicable. For one unit a Standard Environmental Commitment (SEC) (evidence 11) had been issued in line with the national legislation, and for another unit in the sample a Decision Approving Environmental Conditions (DAEC) had been issued by the region in line with national legislation (evidence 10). The evidence provided for a sample of 60 units confirmed that this requirement of the milestone has been met.

Directive 2011/92/EU applies to “the assessment of the environmental effects of those public and private projects which are likely to have significant effects on the environment” (Article 1 of Directive 2011/92/EU). Article 4 of the Directive states that for certain projects, including urban development projects and roads, it is up to individual EU Member States to decide if there will be an EIA on a case by-case basis or by setting specific criteria (such as the location, size or type of project). In line with the provisions of the Directive 2011/92/EU, law no. 4014 of 2011 (evidence 7), as specialized by the Ministerial Decision no. ΥΠΕΝ/ΔΙΠΑ/17185/1069 of 2022 (evidence 8), specifies projects that require environmental permits. Projects and activities that are characterized by local and insignificant environmental impacts do not require an EIA.

#### **Contracts awarded for b) smart led lighting infrastructure for 31 938 poles**

The authorities provided as evidence the decision of contract award issued by the President of the Technical Chamber of Greece (evidence 12), dated 29 October 2024. The contract award decision had been published in the central electronic registry of public contracts proving that the award decisions had been notified to the bidders. The authorities also provided a copy of the executive contract (evidence 13) which concerns the installation of smart led lighting infrastructure for 31 938 poles. The milestone requirement is thus satisfactorily fulfilled.

Furthermore, in line with the description of the measure, **the measure is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU, to ensure compliance with the Do No Significant Harm principle is integrated into the project and strictly complied with at the stages of construction, operation and decommissioning of the infrastructure.**

Directive 2011/92/EU applies to “the assessment of the environmental effects of those public and private projects which are likely to have significant effects on the environment” (Article 1 of Directive 2011/92/EU). Article 4 of the Directive states that for certain projects, including urban development projects and roads, it is up to individual EU Member States to decide if there will be an EIA on a case by-case basis or by setting specific criteria (such as the location, size or type of project). In line with the provisions of the Directive 2011/92/EU, law no. 4014 of 2011 (evidence 7), as specialized by the Ministerial Decision no. ΥΠΕΝ/ΔΙΠΑ/17185/1069 of 2022 (evidence 8), specifies projects that require environmental permits. Projects and activities that are characterized by local and insignificant environmental impacts do not require an EIA.

The works under the contract have minimum environmental impact, and therefore no environmental permits are required in accordance with the applicable national legislation above, and as further explained in Circular ΥΠΕΝ/ΔΙΠΑ/26465/1738 of 17 March 2022 by the Ministry of the Environment and Energy (evidence 9). The DNSH requirement is thus satisfactorily fulfilled.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 268 Hellenic Railways implementation plan

**Related Measure:** 4,6.16982 Organisational reform in the railways sector

**Qualitative Indicator:** Published Implementation Plan for the Hellenic Railways

**Time:** Q2 2024

### 1. Context:

The measure aims at the organisational reform of the Greek railways sector to be made more safe, efficient, integrated, modern and responsive to customer demand, through the following main actions: 1) adoption of a roadmap with the steps for the complete re-organisation of the companies OSE and ERGOSE; 2) recruitment of a specialised Consultant to assist in the implementation of the reform; 3) entry into force of primary and secondary legislation for the reform of the two companies, allowing them to develop, operate and maintain a modern railway network; and 4) implementation of the reform defined in the primary and secondary legislation.

The implementation of the reorganisation may be conducted via fully integrating ERGOSE with OSE.

Milestone 268 requires the publication of an Implementation Plan for the new unified rail infrastructure company (Hellenic Railways), which will be integrating ERGOSE with OSE.

Milestone 268 is the third milestone of the reform, and it follows the completion of milestone 263 and milestone 264. It will be followed by milestone 268a, milestone 268b and milestone 268c, related respectively to the entry into force of amendments to the law governing the railway sector and secondary legislation for a new unified rail infrastructure company with OSE as the core ("Hellenic Railways") that incorporates ERGOSE, the adoption by the Board of Directors of the Hellenic Railways of a multiyear programme with strategic investments and maintenance works, as well as the signature of a contractual agreement with the Greek State, and the completion of the organisational reform in the railways sector. The reform has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2 | Implementation Plan for the new unified rail infrastructure company (Hellenic Railways)                                        | Published Implementation Plan for the Organisational Reform in the railway sector featuring the tasks and the timeline of the transition of the Hellenic Railway Organisation (OSE) to the new, unified rail infrastructure company ("Hellenic Railways")<br><br>the Implementation Plan is published on the site of the Ministry of Infrastructure and Transport in the following web address:<br><a href="http://www.yme.gr/metafores/sidirodromikes-metafores/sidirodromikes-kai-syndyasmenes-metafores/item/13421-sxedio-ylopoiisis-organotikoy-metasximatismoy-ston-sidirodromiko-tomea">www.yme.gr/metafores/sidirodromikes-metafores/sidirodromikes-kai-syndyasmenes-metafores/item/13421-sxedio-ylopoiisis-organotikoy-metasximatismoy-ston-sidirodromiko-tomea</a> |

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|  |  | and<br><a href="https://www.yme.gr/metafores/sidirodromikes-metafores/sidirodromikes-kai-syndyasmenes-metafores/item/download/7287_8ce385e11ec6f08e4ed16bd93022ecd2">https://www.yme.gr/metafores/sidirodromikes-metafores/sidirodromikes-kai-syndyasmenes-metafores/item/download/7287_8ce385e11ec6f08e4ed16bd93022ecd2</a> |
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### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

#### **Publication of an Implementation Plan for the new unified rail infrastructure company (Hellenic Railways)**

The Implementation Plan (evidence 2) has been published on the website of the Ministry of Infrastructure and Transport and is accessible to all. The Implementation Plan describes the tasks and activities for the establishment of the new unified rail infrastructure company "Hellenic Railways" (evidence 2, pages 3-46). For each activity and/or task featured throughout these pages the Implementation Plan establishes the planned duration indicating the start and end dates, the entities in charge of implementation and the entities bearing responsibility, as well as the expected milestones and outcomes.

The milestone is further specified in the Operational Arrangements, which requires that **the implementation plan shall show how the setting up of New OSE would serve to make the Greek rail sector more safe, efficient, integrated, modern and responsive to customer demand.**

The Implementation Plan (evidence 2) features concrete tasks and activities serving to make the Greek rail sector more safe, efficient, integrated, modern and responsive to customer demand. The technical assistance in rail safety and interoperability (evidence 2, pages 22-23), the preparation of a roadmap for the deployment of the European Rail Traffic Management System (ERTMS) (evidence 2, pages 22-23) and the subsequent implementation of ERTMS and interoperability (evidence 2, page 44) enhance safety and efficiency. The merger of OSE with ERGOSE (evidence 2, pages 7-9) in a new entity (Hellenic Railways) and the transfer of the rolling stock management responsibility from GAIAOSE to Hellenic Railways (evidence 2, page 7) result in an integrated Infrastructure Manager entity. The introduction of new technologies through the creation of digital registries for assets, tracks, and maintenance or the development and deployment of a unified automated inspection systems using rolling stock, drones, and ground-based tools, fully integrated with a Computerised Maintenance Management System (CMMS) (evidence 2, page 44) ensure that the new Infrastructure Manager will operate on a modern technologies base. The establishment of a new Freight Transport Unit for coordinating capacity, port connectivity, and logistics corridor planning, the biannual satisfaction and needs survey of key users and stakeholders, the completion of a strategic intervention plan to upgrade 30 stations handling over 60% of total passengers, focusing on commercial space use, passenger services, accessibility, and local connectivity (evidence 2, page 45), are steps towards making the new Infrastructure Manager more responsive to customer (both freight and passenger) demand.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 295 Tourism development: Publication of approval decisions for tourist ports

**Related Measure:** 4,6.16931 Tourism Development

**Qualitative Indicator:** Approval Decisions

**Time:** Q2 2024

### 1. Context:

This investment aims to extend the tourism season in Greece beyond the summer months and promote alternative forms of tourism, contributing to economic resilience, sustainable growth and social and territorial cohesion. The investment comprises two parts: (1) Green Development: development of mountain tourism covering energy efficient renovations of public and private infrastructure and installation of new renewable energy sources' capacity, health and wellness tourism, agro-tourism and gastronomy; and (2) Blue Development: upgrade of tourist ports' infrastructure through energy efficiency measures for existing or new buildings and interventions to improve the infrastructure and services offered in marinas, accessibility to beaches for older people and persons with disabilities, and to promote the development of diving and underwater tourism. Projects must comply with EU environmental law and the Do No Significant Harm Technical Guidance.

Milestone 295 concerns the publication of approval decisions for the selected beneficiaries to upgrade tourist ports' infrastructure and improve, among others, their energy efficiency.

Milestone 295 is the second milestone of the investment, it follows the completion of milestone 292, related to the reform of the regulatory framework for tourist ports and ski resorts and the establishment of a project management office for supervision of investments in tourist ports, and it will be followed by milestone 297, related to the completion of works in tourist ports and other tourism interventions foreseen under the measure. The investment has a final expected date for implementation on 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                            |
|---|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                              |
| 2 | Approval Decision 8020/25.04.2024 – upgrade of tourist port OLYMPIK Marin AE                                                   | Copy of Approval Decision 8020/25.04.2024 of the Minister for Tourism for upgrading the tourist port of OLYMPIK Marin AE                                     |
| 3 | Approval Decision 17269/01.10.2024 (1 <sup>st</sup> amendment of Approval Decision 8020/25.04.2024)                            | Copy of Approval Decision 17269/01.10.2024 of the Minister for Tourism amending elements of the implementation timeline of approval decision 8020/25.04.2024 |
| 4 | Approval Decision 19933/13.11.2024 (2 <sup>nd</sup> amendment of Approval Decision 8020/25.04.2024)                            | Copy of Approval Decision 19933/13.11.2024 of the Minister for Tourism amending elements of the implementation timeline of approval decision 8020/25.04.2024 |
| 5 | Approval Decision 8022/25.04.2024 – upgrade of marina Agiou Kosma                                                              | Copy of Approval Decision 8022/25.04.2024 of the Minister for Tourism for upgrading the marina of Agios Kosmas                                               |

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| 6  | Approval Decision 14712/09.08.2024 (1 <sup>st</sup> amendment of Approval Decision 8022/25.04.2024)  | Copy of Approval Decision 14712/09.08.2024 of the Minister of Tourism amending elements of the implementation timeline of Approval Decision 8022/25.04.2024   |
| 7  | Approval Decision 19930/13.11.2024 (2 <sup>nd</sup> amendment of Approval Decision 8022/25.04.2024)  | Copy of Approval Decision 19930/13.11.2024 of the Minister of Tourism amending elements of the implementation timeline of Approval Decision 8022/25.04.2024   |
| 8  | Approval Decision 8015/25.04.2024 – upgrade of tourist port (marina) Rhodou                          | Copy of Approval Decision 8015/25.04.2024 of the Minister for Tourism for upgrading the marina of Rhodes                                                      |
| 9  | Approval Decision 14711/09.08.2024 (1 <sup>st</sup> amendment of Approval Decision 8015/25.04.2024)  | Copy of Approval Decision 14711/09.08.2024 of the Minister of Tourism amending elements of the implementation timeline of Approval Decision 8015/25.04.2024   |
| 10 | Approval Decision 19929/13.11.2024 (2 <sup>nd</sup> amendment of Approval Decision 8015/25.04.2024)  | Copy of Approval Decision 19929/13.11.2024 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 8015/25.04.2024  |
| 11 | Approval Decision 11120/12.06.2024 – upgrade of tourist port - marina Gouviwn–                       | Copy of Approval Decision 11120/12.06.2024 of the Minister for Tourism for upgrading the tourist port - marina of Gouvies                                     |
| 12 | Approval Decision 11119/12.06.2024 – upgrade of tourist port - marina Lefkadas                       | Copy of Approval Decision 11119/12.06.2024 of the Minister for Tourism for upgrading the tourist port - marina Lefkadas                                       |
| 13 | Approval Decision 18636/23.10.2024 (1 <sup>st</sup> amendment of Approval Decision 11119/12.06.2024) | Copy of Approval Decision 18636/23.10.2024 of the Minister of Tourism amending elements of the implementation timeline of Approval Decision 11119/12.06.2024  |
| 14 | Approval Decision 370/09.01.2025 (2 <sup>nd</sup> amendment of Approval Decision 11119/12.06.2024)   | Copy of Approval Decision 370/09.01.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 11119/12.06.2024   |
| 15 | Approval Decision 11121/12.06.2024 – upgrade of tourist port - marina Zeas                           | Copy of Approval Decision 11121/12.06.2024 of the Minister for Tourism for upgrading the tourist port - marina Zeas                                           |
| 16 | Approval Decision 18637/23.10.2024 (1 <sup>st</sup> amendment of Approval Decision 11121/12.06.2024) | Copy of Approval Decision 18637/23.10.2024 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 11121/12.06.2024 |
| 17 | Approval Decision 338/09.01.2025 (2 <sup>nd</sup> amendment of Approval Decision 11121/12.06.2024)   | Copy of Approval Decision 338/09.01.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 11121/12.06.2024   |
| 18 | Approval Decision 12350/02.07.2024 – upgrade of                                                      | Copy of Approval Decision 12350/02.07.2024 of the Minister for Tourism for upgrading the                                                                      |

|    |                                                                                                      |                                                                                                                                                               |
|----|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | tourist anchorage of Elhos, Neo Klima, Skopelos island                                               | tourist anchorage at the location of Elhos, Neo Klima, Skopelos island                                                                                        |
| 19 | Approval Decision 18638/23.10.2024 (1 <sup>st</sup> amendment of Approval Decision 12350/02.07.2024) | Copy of Approval Decision 18638/23.10.2024 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 12350/02.07.2024 |
| 20 | Approval Decision 340/09.01.2025 (2 <sup>nd</sup> amendment of Approval Decision 12350/02.07.2024)   | Copy of Approval Decision 340/09.01.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 12350/02.07.2024   |
| 21 | Approval Decision 12352/02.07.2024 – upgrade of tourist port - marina Floisvos                       | Copy of Approval Decision 12352/02.07.2024 of the Minister for Tourism for upgrading the tourist port – marina Floisvos                                       |
| 22 | Approval Decision 18639/23.10.2024 (1 <sup>st</sup> amendment of Approval Decision 12352/02.07.2024) | Copy of Approval Decision 18639/23.10.2024 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 12352/02.07.2024 |
| 23 | Approval Decision 342/09.01.2025 (2 <sup>nd</sup> amendment of Approval Decision 12352/02.07.2024)   | Copy of Approval Decision 342/09.01.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 12352/02.07.2024   |
| 24 | Approval Decision 12354/02.07.2024 – upgrade of tourist port Kleopatra Marina Anonimos Etaireia      | Copy of Approval Decision 12354/02.07.2024 of the Minister for Tourism for upgrading the tourist port – Kleopatra Marina Anonimos Etaireia (SA)               |
| 25 | Approval Decision 18640/23.10.2024 (1 <sup>st</sup> amendment of Approval Decision 12354/02.07.2024) | Copy of Approval Decision 18640/23.10.2024 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 12354/02.07.2024 |
| 26 | Approval Decision 348/09.01.2025 (2 <sup>nd</sup> amendment of Approval Decision 12354/02.07.2024)   | Copy of Approval Decision 348/09.01.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 12354/02.07.2024   |
| 27 | Approval Decision 22328/19.12.2024 – construct tourist port (marina) Nafpliou                        | Copy of Approval Decision 22328/19.12.2024 of the Minister for Tourism for constructing tourist port (marina) Nafpliou                                        |
| 28 | Approval Decision 8104/29.04.2025 (1 <sup>st</sup> amendment of Approval Decision 22328/19.12.2024)  | Copy of Approval Decision 8104/29.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 22328/19.12.2024  |
| 29 | Approval Decision 18635/23.10.2024 – upgrade of tourist port of Preveza                              | Copy of Approval Decision 18635/23.10.2024 of the Minister for Tourism for upgrading the tourist port of Preveza                                              |
| 30 | Approval Decision 6976/11.04.2025 (1 <sup>st</sup> amendment of Approval Decision 18635/23.10.2024)  | Copy of Approval Decision 6976/11.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 18635/23.10.2024  |
| 31 | Approval Decision 8103/29.04.2025 (2 <sup>nd</sup> amendment of Approval Decision 18635/23.10.2024)  | Copy of Approval Decision 8103/29.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 18635/23.10.2024  |

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| 32 | Approval Decision 19939/13.11.2024 – upgrade of tourist port Drapanos, Hersonisos, Herakleiou              | Copy of Approval Decision 19939/13.11.2024 of the Minister for Tourism for upgrading the tourist port Drapanos at Hersonisos, Herakleio                            |
| 33 | Approval Decision 20687/26.11.2024 – upgrade of tourist port Vouliagmeni                                   | Copy of Approval Decision 20687/26.11.2024 of the Minister for Tourism for upgrading the tourist port of Vouliagmeni                                               |
| 34 | Approval Decision 8102/29.04.2025 (1 <sup>st</sup> amendment of Approval Decision 20687/26.11.2024)        | Copy of Approval Decision 8102/29.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 20687/26.11.2024       |
| 35 | Approval Decision 13025/25.06.2025 (2 <sup>nd</sup> amendment of Approval Decision 20687/26.11.2024)       | Copy of Approval Decision 13025/25.06.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 20687/26.11.2024      |
| 36 | Approval Decision 20689/26.11.2024 – upgrade of tourist ports – optimum marinas (Agia Pelagia, Argostoli)  | Copy of Approval Decision 20689/26.11.2024 of the Minister for Tourism for upgrading the tourist ports – optimum marinas at Agia Pelagia, Argostoli                |
| 37 | Approval Decision 6977/11.04.2025 (1 <sup>st</sup> amendment of Approval Decision 20689/26.11.2024)        | Copy of Approval Decision 6977/11.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 20689/26.11.2024       |
| 38 | Approval Decision 13029/25.06.2025 (2 <sup>nd</sup> amendment of Approval Decision 20689/26.11.2024)       | Copy of Approval Decision 13029/25.06.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 20689/26.11.2024      |
| 39 | Approval Decision 20690/26.11.2024 – upgrade of tourist port – Karavostasi, Ormos Fodele, Dimos Maleviziou | Copy of Approval Decision 20690/26.11.2024 of the Minister for Tourism for upgrading the tourist port of Karavostasi, Ormos Fodele, Dimos Maleviziou, Crete island |
| 40 | Approval Decision 6979/11.04.2025 (1 <sup>st</sup> amendment of Approval Decision 20690/26.11.2024)        | Copy of Approval Decision 6979/11.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 20690/26.11.2024       |
| 41 | Approval Decision 13030/25.06.2025 (2 <sup>nd</sup> amendment of Approval Decision 20690/26.11.2024)       | Copy of Approval Decision 13030/25.06.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 20690/26.11.2024      |
| 42 | Approval Decision 20688/26.11.2024 – upgrade of tourist port – Potos Thasou                                | Copy of Approval Decision 20688/26.11.2024 of the Minister for Tourism for upgrading the tourist port of Potos, Thasos island                                      |
| 43 | Approval Decision 6980/11.04.2025 (1 <sup>st</sup> amendment of Approval Decision 20688/26.11.2024)        | Copy of Approval Decision 6980/11.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 20688/26.11.2024       |
| 44 | Approval Decision 20820/28.11.2024 – upgrade tourist port – Leros                                          | Copy of Approval Decision 20820/28.11.2024 of the Minister for Tourism for upgrading the tourist port of Leros island                                              |
| 45 | Approval Decision 6984/11.04.2025 (1 <sup>st</sup> amendment                                               | Copy of Approval Decision 6984/11.04.2025 of the Minister for Tourism amending elements of                                                                         |

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|    | of Approval Decision 20820/28.11.2024                                                                 | the implementation timeline of Approval Decision 20820/28.11.2024                                                                                             |
| 46 | Approval Decision 13031/25.06.2025 (2 <sup>nd</sup> amendment of Approval Decision 20820/26.11.2024)  | Copy of Approval Decision 13031/25.06.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 20820/26.11.2024 |
| 47 | Approval Decision 22739/24.12.2024 – upgrade of tourist port – marina Kerkyras                        | Copy of Approval Decision 22739/24.12.2024 of the Minister for Tourism for upgrading the tourist port – marina Kerkyras                                       |
| 48 | Approval Decision 8101/29.04.2025 – (1 <sup>st</sup> amendment of Approval Decision 22739/24.12.2024) | Copy of Approval Decision 8101/29.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 22739/24.12.2024  |
| 49 | Approval Decision 13028/25.06.2025 (2 <sup>nd</sup> amendment of Approval Decision 22739/24.12.2024)  | Copy of Approval Decision 13028/25.06.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 22739/24.12.2024 |
| 50 | Approval Decision 22748/24.12.2024 – upgrade tourist port – Linaria Skyrou                            | Copy of Approval Decision 22748/24.12.2024 of the Minister for Tourism for upgrading the tourist port of Linaria, Skyros island                               |
| 51 | Approval Decision 6985/11.04.2025 (1 <sup>st</sup> amendment of Approval Decision 22748/24.12.2024)   | Copy of Approval Decision 6985/11.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 22748/24.12.2024  |
| 52 | Approval Decision 13014/25.06.2025 (2 <sup>nd</sup> amendment of Approval Decision 22748/24.12.2024)  | Copy of Approval Decision 13014/25.06.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 22748/24.12.2024 |
| 53 | Approval Decision 6808/10.04.2025 – water protection and treatment marina Alimou                      | Copy of Approval Decision 6808/10.04.2025 of the Minister for Tourism for water protection and treatment of marina Alimou                                     |
| 54 | Approval Decision 350/09.01.2025 – upgrade of tourist port Pleura Ellinikwn, Elounda, Crete           | Copy of Approval Decision 350/09.01.2025 of the Minister for Tourism for upgrading the tourist port of Pleura Ellinikwn, Elounda, Crete island                |
| 55 | Approval Decision 6989/11.04.2025 (1 <sup>st</sup> amendment of Approval Decision 350/09.01.2025)     | Copy of Approval Decision 6989/11.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 350/09.01.2025    |
| 56 | Approval Decision 351/09.01.2025 – upgrade of tourist boat shelter of Nea Moudania, Nea Propontida    | Copy of Approval Decision 351/09.01.2025 of the Minister for Tourism for upgrading the tourist boat shelter of Nea Moudania, Nea Propontida                   |
| 57 | Approval Decision 6990/11.04.2025 (1 <sup>st</sup> amendment of Approval Decision 351/09.01.2025)     | Copy of Approval Decision 6990/11.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 351/09.01.2025    |
| 58 | Approval Decision 13015/25.06.2025 (2 <sup>nd</sup>                                                   | Copy of Approval Decision 13015/25.06.2025 of the Minister for Tourism amending elements of                                                                   |

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|    | amendment of Approval Decision 351/09.01.2025)                                                      | the implementation timeline of Approval Decision 351/09.01.2025                                                                                              |
| 59 | Approval Decision 389/09.01.2025 – upgrade of tourist port of Kos island                            | Copy of Approval Decision 389/09.01.2025 of the Minister for Tourism for upgrading the tourist port of Kos island                                            |
| 60 | Approval Decision 6991/11.04.2025 (1 <sup>st</sup> amendment of Approval Decision 389/09.01.2025)   | Copy of Approval Decision 6991/11.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 389/09.01.2025   |
| 61 | Approval Decision 13018/25.06.2025 (2 <sup>nd</sup> amendment of Approval Decision 389/09.01.2025)  | Copy of Approval Decision 13018/25.06.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 389/09.01.2025  |
| 62 | Approval Decision 4472/13.03.2025 – upgrade of tourist port of Thesi Pedi, Symi island              | Copy of Approval Decision 4472/13.03.2025 of the Minister for Tourism for upgrading the tourist port of Thesi Pedi, Symi island                              |
| 63 | Approval Decision 361/09.01.2025 – upgrade of tourist boat shelter Ormos Atherinou, Meganisi island | Copy of Approval Decision 361/09.01.2025 of the Minister for Tourism for upgrading the tourist boat shelter of Ormos Atherinou, Meganisi island              |
| 64 | Approval Decision 8243/30.04.2025 (1 <sup>st</sup> amendment of Approval Decision 361/09.01.2025)   | Copy of Approval Decision 8243/30.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 361/09.01.2025   |
| 65 | Approval Decision 7088/14.04.2025 – upgrade of the tourist shelter of Astakos                       | Copy of Approval Decision 7088/14.04.2025 of the Minister for Tourism for upgrading the tourist shelter of Astakos                                           |
| 66 | Approval Decision 365/09.01.2025– upgrade of the tourist port of Agios Nikolaos, Crete island       | Copy of Approval Decision 365/09.01.2025 of the Minister for Tourism for upgrading the tourist port of Agios Nikolaos, Crete island                          |
| 67 | Approval Decision 8100/29.04.2025 (1 <sup>st</sup> amendment of Approval Decision 365/09.01.2025)   | Copy of Approval Decision 8100/29.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 365/09.01.2025   |
| 68 | Approval Decision 4473/13.03.2025 – upgrade of marina Mesolongiou                                   | Copy of Approval Decision 4473/13.03.2025 of the Minister for Tourism for upgrading the marina of Mesolongi                                                  |
| 69 | Approval Decision 13020/25.06.2025 (1 <sup>st</sup> amendment of Approval Decision 4473/13.03.2025) | Copy of Approval Decision 13020/25.06.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 4473/13.03.2025 |
| 70 | Approval Decision 707/16.01.2025 – upgrade of the tourist port of Patradise mega yacht marina       | Copy of Approval Decision 707/16.01.2025 of the Minister for Tourism for upgrading the tourist port of Patradise mega yacht marina                           |
| 71 | Approval Decision 8099/29.04.2025 (1 <sup>st</sup> amendment of Approval Decision 707/16.01.2025)   | Copy of Approval Decision 8099/29.04.2025 of the Minister for Tourism amending elements of the implementation timeline of Approval Decision 707/16.01.2025   |

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| 72 | Approval Decision 700/16.01.2025 – upgrade of tourist boat shelter of Poros island                                                                                                                                                                               | Copy of Approval Decision 700/16.01.2025 of the Minister for Tourism for upgrading the tourist boat shelter of Poros island                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 73 | Approval Decision 8098/29.04.2025 (1 <sup>st</sup> amendment of Approval Decision 700/16.01.2025)                                                                                                                                                                | Copy of Approval Decision 8098/29.04.2025 of the Minister for Tourism amending Approval Decision 700/16.01.2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 74 | Call 19636/25.10.2023,<br><br>Call 24116/27.12.2023 (1 <sup>st</sup> amendment),<br><br>Call 1775/31.01.2024 (2 <sup>nd</sup> amendment),<br><br>Call 18746/23.10.2024 (3 <sup>rd</sup> amendment), and<br><br>Call 22182/18.12.2024 (4 <sup>th</sup> amendment) | Copy of call 19636/25.10.2023 of the Minister of Tourism for the upgrade of tourist ports<br><br>Copy of call 24116/27.12.2023 – 1 <sup>st</sup> amendment of call 19636/25.10.2023 of the Minister of Tourism for the upgrade of tourist ports<br><br>Copy of call 1775/31.01.2024 – 2 <sup>nd</sup> amendment of call 19636/25.10.2023 of the Minister of Tourism for the upgrade of tourist ports<br><br>Copy of call 18746/23.10.2024 – 3 <sup>rd</sup> amendment of call 19636/25.10.2023 of the Minister of Tourism for the upgrade of tourist ports<br><br>Copy of call 22182/18.12.2024 – 4 <sup>th</sup> amendment of call 19636/25.10.2023 of the Minister of Tourism for the upgrade of tourist ports |
| 75 | Self-declarations by investors regarding compliance of the investment project with the DNSH principle                                                                                                                                                            | A self-declaration for each of the 30 approved projects was submitted by each respective investor regarding compliance of the investment with the DNSH principle, in line with the requirements of Annex VIII of the call for proposals                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

#### **Publication of Approval Decisions for the selected beneficiaries to upgrade tourist ports' infrastructure and improve, among others, their energy efficiency.**

The Greek authorities submitted the relevant approval Decisions (evidence 2 to 73) for the 30 ports that were selected following the relevant calls (evidence 74, call 19636/25.10.2023 as amended by calls 24116/27.12.2023, 1775/31.01.2024, 18746/23.10.2024 and 22182/18.12.2024) to upgrade and improve their infrastructure (existing or new buildings). All approval Decisions (evidence 2 to 73) were issued by the Minister of Tourism.

Call 19636/25.10.2023 (evidence 74, Section 8.2 “Categories of eligible expenditure”, page 20-22) specifies the type of eligible expenditure under the call as follows: (i) upgrading the infrastructure of existing tourist ports to address advanced market needs and maintain the international competitiveness of the relevant tourism product and of new tourist ports as long as they meet maturity standards specified in the call's implementation guide; (ii) energy/green upgrading of infrastructure, including the incorporation/certification for green tourist ports on the basis of international standards;

(iii) digitization actions; and (iv) construction/upgrading of existing facilities to make them accessible to all visitors.

Approval decisions (evidence 2-73; section 3 of each respective decision) indicate the approved expenditure under call 19636/25.10.2023 for upgrading tourist ports infrastructure and improving, among others, their energy efficiency.

Furthermore, in line with the description of the measure, **the investment comprises two parts: (2) Blue Development: upgrade of tourist ports' infrastructure through energy efficiency measures for existing or new buildings and interventions to improve the infrastructure and services offered in marinas.**

Call 19636/25.10.2023 (evidence 74, "Introduction", page 5) specifies that eligible actions aim to the upgrade of tourist ports' (shelters, anchorages and marinas, according with Law N.2160/1993, as amended and currently in operation), infrastructure offering athletic or multifunctional entertainment services in line with the new Green and Smart standards. Therefore, the upgrade of ports infrastructure is expected to improve the services offered in marinas.

Moreover, call 19636/25.10.2023 (evidence 74, Section 12.1 "Eligibility Criteria", page 33) includes a specific eligibility criterion 4 "Green and Blue Development" requiring that investments under this call should include at least one of the following actions:

- Investments in building installations to achieve a higher energy efficiency coefficient
- Investments in mechanical equipment with reduced energy consumption
- Investments in electrified vehicle networks
- Investments in renewable energy resources (used exclusively for own consumption)
- Water-saving measures through desalination/osmosis systems etc.
- Investments to improve the environment and greenery by planting

Based on call 19636/25.10.2023 (evidence 74), the Ministry evaluated the proposals received and issued 30 approval decisions (evidence 2-73). Each approval decision contains approved interventions eligible for financing depending on the port.

The approval decisions include, among other interventions to upgrade tourist ports' infrastructure, energy efficiency measures for new and existing buildings such as installation of photovoltaics, installation of electric vehicle charging stations and constructions with thermal insulations.

Moreover, the approval decisions include, among other interventions to upgrade tourist ports' infrastructure, works to improve services offered in marinas such as electricity and water supply towers for vessels with remote monitoring and consumption, and construction of playgrounds and outdoor gymnastic complexes.

Therefore, the upgrade of ports infrastructure is expected to improve energy efficiency and services offered in marinas.

Furthermore, in line with the description of the measure, **in order to ensure that the measure complies with the Do No Significant Harm Technical Guidance (2021/C58/01), the eligibility criteria contained in terms of reference for calls for projects shall exclude the following list of activities: (i) activities related to fossil fuels, including downstream use; (ii) activities under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks; (iii) activities related to waste landfills, incinerators and mechanical biological treatment plants; and (iv) activities where the long-term disposal of waste may cause harm to the environment. The terms of reference shall additionally require that only activities that comply with relevant EU and national environmental legislation may be selected.**

Regarding the DNSH requirement set out in the description of the measure in the annex of the Council Implementing Decision, call 19636/25.10.2023 (evidence 74, Section 7, page 13-14) excludes the following activities from the scope of the call: (i) activities related to fossil fuels, including downstream use<sup>2</sup>; (ii) activities under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks<sup>3</sup>; (iii) activities related to waste landfills, incinerators<sup>4</sup> and mechanical biological treatment plants<sup>5</sup>; and (iv) activities where the long-term disposal of waste may cause harm to the environment. Moreover, it stipulates that only activities that comply with the relevant EU and national environmental legislation may be selected according to the eligibility criteria. Call 19636/25.10.2023 (evidence 74, Annex VIII, page 95-99) also requires that the legal or natural person responsible for the upgrade of tourist ports provides a self-declaration for complying with the DNSH principle. The Greek authorities submitted the self-declarations which were provided by each respective investor for all 30 approved projects (evidence 75), attesting to the exclusion of the abovementioned activities from the scope of the investment plans. Lastly, all approval decisions (evidence 2-73, Annex I, Section 1.2) require that the beneficiary complies with the DNSH principle.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

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<sup>2</sup> Except projects under this measure in power and/or heat generation, as well as related transmission and distribution infrastructure, using natural gas, that are compliant with the conditions set out in Annex III of the 'Do no significant harm' Technical Guidance (2021/C58/01).

<sup>3</sup> Where the activity supported achieves projected greenhouse gas emissions that are not significantly lower than the relevant benchmarks an explanation of the reasons why this is not possible should be provided. Benchmarks established for free allocation for activities falling within the scope of the Emissions Trading System, as set out in the Commission Implementing Regulation (EU) 2021/447.

<sup>4</sup> This exclusion does not apply to actions under this measure in plants exclusively dedicated to treating non-recyclable hazardous waste, and to existing plants, where the actions under this measure are for the purpose of increasing energy efficiency, capturing exhaust gases for storage or use or recovering materials from incineration ashes, provided such actions under this measure do not result in an increase of the plants' waste processing capacity or in an extension of the lifetime of the plants; for which evidence is provided at plant level.

<sup>5</sup> This exclusion does not apply to actions under this measure in existing mechanical biological treatment plants, where the actions under this measure are for the purpose of increasing energy efficiency or retrofitting to recycling operations of separated waste to compost bio-waste and anaerobic digestion of bio-waste, provided such actions under this measure do not result in an increase of the plants' waste processing capacity or in an extension of the lifetime of the plants; for which evidence is provided at plant level.

**Number and name of the Milestone:** 304 Industrial Parks - legislative reform (secondary legislation)

**Related Measure:** 4,6.16634 New Industrial Parks

**Qualitative Indicator:** Entry into force of all required legislation

**Time:** Q2 2024

### 1. Context:

The investment comprises the provision of financial assistance for the establishment, expansion and upgrade of the infrastructure of industrial parks and the transformation of areas with high industrial concentration to green and digitalized industrial parks, in compliance with the Do No Significant Harm Technical Guidance (2021/C58/01). The measure also includes a reform of the regulatory framework for industrial parks, including addressing legal uncertainties, resolving governance issues, and providing effective incentives for the resolution of informal industrial concentrations.

Milestone 304 requires the entry into force of all necessary secondary legislation to operationalise the new framework to improve the regulatory framework for industrial business parks, including addressing legal uncertainties, resolving governance issues, and providing effective incentives for the resolution of informal industrial concentrations.

Milestone 304 is the third milestone of the investment, and it follows the completion of milestone 301, related to the launch of the calls for proposals for the investment strand of the measure i.e. the provision of financial assistance, and milestone 302, related to the enactment of primary legislation to reform the regulatory framework for industrial parks. It will be followed by milestone 307, related to the completion of construction of all investment projects selected under the calls for proposals. The investment has a final expected date for implementation in Q4/2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                            | Short description                                                                                                                                                                                                                                             |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                  |                                                                                                                                                                                                                                                               |
| 2 | Joint Ministerial Decision no. 53508/2025 of i) the Deputy Minister of Development and ii) the Minister of Environment and Energy<br><br>Official Journal B' 3591/10.07.2025                                                    | JMD 53508/2025 introducing the criteria and specifications for the classification of a business park as an ecological park, entered into force on 10 July 2025 (date of publication in the Official Journal).                                                 |
| 3 | Joint Ministerial Decision no. 53603/2025 of i) the Minister and Deputy Minister of Environment and Energy, ii) the Minister of Finance, and iii) the Deputy Minister of Development<br><br>Official Journal B' 3613/10.07.2025 | JMD 53603/2025 regulating the type of application referred to in Article 7 of law 4982/2022, as well as the necessary documentation for the licensing of the business park, entered into force on 10 July 2025 (date of publication in the Official Journal). |

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| 4  | <p>Joint Ministerial Decision no. 46117/2025 of i) the Deputy Minister of Development and ii) the Minister and Deputy Minister of Environment and Energy</p> <p>Official Journal B' 3273/26.06.2025</p>                                                 | <p>JMD 46117/2025 regulating the method of organization and the minimum infrastructure of the Business Rehabilitation Parks, the type and specifications of the studies of paragraph 1 of Article 20 of law 4982/2022 and any other relevant issue for the development and operation of the business rehabilitation parks, entered into force on 26 June 2025 (date of publication in the Official Journal).</p>                                                                                                                  |
| 5  | <p>Joint Ministerial Decision no. 46587/2025 issued by i) the Deputy Minister of Development and ii) the Minister of Finance</p> <p>Official Journal B' 3190/24.06.2025</p>                                                                             | <p>JMD 46587/2025 introducing the procedure for granting the incentives of Articles 28 and 30 of law 4982/2022, entered into force on 24 June 2025 (date of publication in the Official Journal).</p>                                                                                                                                                                                                                                                                                                                             |
| 6  | <p>Joint Ministerial Decision no. 47469/2025 issued by i) the Deputy Minister of Development, ii) the Minister and Deputy Minister of Environment and Energy and iii) the Minister of Digital Governance</p> <p>Official Journal B' 3437/04.07.2025</p> | <p>JMD 47469/2025 regulating the specific issues for the establishment of the registry of inert industrial buildings, the access of building owners to it, the manner of their declaration pursuant to Article 34 of law 4982/2022, and any technical or other relevant issue, entered into force on 4 July 2025 (date of publication in the Official Journal).</p>                                                                                                                                                               |
| 7  | <p>Joint Ministerial Decision no. 44736/2025 issued by i) the Deputy Minister of Development, and ii) the Minister of Digital Governance,</p> <p>Official Journal B' 3147/23.06.2025</p>                                                                | <p>JMD 44736/2025 introducing the specific issues for the expansion and operation of the Integrated Information System for the Exercise of Activities and for their Audit and Control, the interconnection of the database of paragraph 4 of Article 34 of law 4982/2022, the establishment of the electronic platform of paragraph 5 of the same Article, the mode of operation of the database and any technical or other relevant issue, entered into force on 23 June 2025 (date of publication in the Official Journal).</p> |
| 8  | <p>Ministerial Decision no. 19095/2025 issued by the Deputy Minister of Development,</p> <p>Official Journal B' 1206/12.3.2025</p>                                                                                                                      | <p>MD 19095/2025 determining the type and content of the activity compatibility certificate for the installation of a business in a business park, entered into force on 12 March 2025 (date of publication in the Official Journal).</p>                                                                                                                                                                                                                                                                                         |
| 9  | <p>Ministerial Decision no. 25386/2025 issued by the Deputy Minister of Development,</p> <p>Official Journal B' 2213/08.05.2025</p>                                                                                                                     | <p>MD 25386/2025 providing specifications of the procedure of the audit and control of business parks, and the imposition of sanctions in case of violations of the legal framework regarding the operation of the business park, entered into force on 8 May 2025 (date of publication in the Official Journal).</p>                                                                                                                                                                                                             |
| 10 | <p>Joint Ministerial Decision no. 55732/2025 issued by the Deputy</p>                                                                                                                                                                                   | <p>JMD 55732/2025 determining the compensation for the members of the audit committees for carrying out the audits, entered into force on 17</p>                                                                                                                                                                                                                                                                                                                                                                                  |

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|    | Ministers of i) Development and ii) Finance<br><br>Official Journal YODD' 874/17.07.2025                                                                                                       | July 2025 (date of publication in the Official Journal).                                                                                                                                                                                                                                                                             |
| 11 | Ministerial Decision no. 29577/2025 issued by the Deputy Minister of Development,<br><br>Official Journal B' 2025/28.04.2025                                                                   | MD 29577/2025 providing the basic principles and evaluation criteria of a business plan for the development of a business park, entered into force on 28 April 2025 (date of publication in the Official Journal).                                                                                                                   |
| 12 | Ministerial Decision no. 16942/2023 issued by the Minister of Development,<br><br>Official Journal B' 1093/28.02.2023                                                                          | MD 16942/2023 providing the procedure and determination of the documentation for subjecting Organized Areas for Manufacturing and Business Activities governed by laws 4458/1965, 2545/1997 and 3982/2011, to the provisions of law 4982/2022, entered into force on 28 February 2023 (date of publication in the Official Journal). |
| 13 | Joint Ministerial Decision no. 18211/2023 issued by i) the Minister of Development and ii) the Minister and Deputy Minister of Environment & Energy<br><br>Official Journal B' 1147/28.02.2023 | JMD 18211/2023 providing the procedure for the definition, zoning, organization, required documentation, building conditions, as well as the way of operation and management of large single-unit business parks, entered into force on 28 February 2023 (date of publication in the Official Journal).                              |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Entry into force of all necessary secondary legislation to operationalise the new framework to improve the regulatory framework for industrial business parks, including addressing legal uncertainties, resolving governance issues, and providing effective incentives for the resolution of informal industrial concentrations.**

The new primary legislative framework, which addresses legal uncertainties, resolves governance issues, and provides effective incentives for the resolution of informal industrial concentrations, was introduced with the adoption of law 4982/2022, entered into force on 15 October 2022, and was assessed in the context of earlier milestone 302.

Greece adopted all secondary legislation that is needed to operationalise the provisions of the abovementioned new framework for industrial business parks. Specifically, Greece adopted the following secondary legislation acts deriving from the enabling provisions of Article 46 of law 4982/2022 (hereinafter referred to as "Law"), and submitted the respective pieces of evidence:

The Joint Ministerial Decision no. 53508/2025, Official Journal B' 3591/10.07.2025 (entered into force on its publication date, as per Article 7 of the Decision), as per Article 46, paragraph 1 of the Law (evidence 2). The said Decision, which operationalises the provisions of Article 4, paragraph 2, of the Law, provides for a clear definition and criteria for the classification of a

business park as an “ecological park”, based on a number of indicators, including energy efficiency, use of materials and water, circularity and impact on biodiversity.

- The Joint Ministerial Decision no. 53603/2025, Official Journal B’ 3613/10.07.2025 (entered into force on its publication date, as per Article 16 of the Decision), as per Article 46, paragraph 2 of the Law (evidence 3). The Decision specifies the type of application needed to establish a business park as described in Article 7 of the Law, as well as the necessary documentation and other matters related to the licensing of the business park, such as the content of the feasibility, financial viability and technical studies, the minimum infrastructure works required for the operation of the business park, the required fees, the procedure and criteria for evaluating the application, the specifications, the type and content of the urban planning and general technical studies and the documentation that accompany them.
- The Joint Ministerial Decision no. 46117/2025, Official Journal B’ 3273/26.06.2025 (entered into force on its publication date, as per Article 7 of the Decision), as per Article 46, paragraph 10 of the Law (evidence 4). The Decision regulates the organisation and the minimum infrastructure required for the business rehabilitation parks, the type and specifications of the studies required under Article 20, paragraph 1, of the Law, and other related matters for the development and operation of the business rehabilitation park in areas that have been classified as informal industrial concentrations. The said Decision further regulates matters related to Article 20, paragraph 1, of the Law, which provides for the possibility to develop a business rehabilitation park either through a call for expressions of interest by the Ministry of Development, or the submission of an application by an interested Business Park Development and Management Company.
- The Joint Ministerial Decision no. 46587/2025, Official Journal B’ 3190/24.06.2025 (entered into force on its publication date, as per Article 10 of the Decision), as per Article 46, paragraph 12 of the Law (evidence 5). The Decision introduces the procedure for granting the incentives provided for in Articles 28 and 30 of Law. Such incentives are applicable to all types of parks, including for the informal industrial concentrations which are converted to business rehabilitation parks. More specifically, Article 28 provides for the incentives regarding the establishment of a business park, such as tax incentives. Article 30 provides for the incentives related to the establishment and operation of the relevant activities conducted within the business parks.
- The Joint Ministerial Decision no. 47469/2025, Official Journal B’ 3437/04.07.2025 (entered into force on its publication date as per Article 12 of the Decision), as per Article 46, paragraph 16 of the Law (evidence 6). The Decision, regulates: a) the specific conditions for the development, organisation and operation of the registry of inert industrial buildings foreseen under Article 34, paragraph 3, of the Law which captures information about industrial facilities that have ceased operation for at least five years from the start of their operation; b) issues related to the interconnection of the registry with other information systems of the public administration; c) the responsibilities of the involved public services; and d) the information that these services are obliged to published therein, as well as the conditions or restrictions of access to the relevant information to users.
- The Joint Ministerial Decision no. 44736/2025, Official Journal B’ 3147/23.06.2025 (entered into force on its publication date as per Article 13 of the Decision), as per Article 46, paragraph 17 of the Law (evidence 7). The Decision introduces the specific issues for the expansion and operation of the Integrated Information System for the Exercise of Activities and for their Audit and Control foreseen under Article 34, paragraphs 1 and 2, of the Law to: a) accommodate the

licensing process for business parks; b) provide for the interconnection of this system with the database of the Geographical Information System for the land uses and building conditions related to manufacturing and relevant business activities conducted in Greek territory foreseen under of Article 34, paragraph 4, of the Law; and c) regulate the establishment of the electronic platform for stakeholders consultation at regional level foreseen under paragraph 5 of the same Article, and the mode of operation of the database.

- The Ministerial Decision no. 19095/2025, Official Journal B' 1206/12.3.2025 (entered into force on its publication date, as per Article 8 of the Decision), as per Article 46, paragraph 13 of the Law (evidence 8). The Decision determines: a) the type and content of the compatibility certificate of a business for its establishment in a business park, as provided under Article 29, paragraph 1, of the Law; b) the relevant authority issuing the certificate; c) the conditions under which the certificate cannot be issued; and d) the relevant administrative sanctions. Specifically, three different types of certificates are covered, namely for the establishment of a business within the park, for the modernization/expansion of an existing business within the park, and for the relocation of an existing business within the business park.

The Ministerial Decision no. 25386/2025, Official Journal B' 2213/08.05.2025 (entered into force on its publication date as per Article 14 of the Decision), as per Article 46, paragraph 15a, of the Law (evidence 9). The Decision: a) designates the relevant Department of the General Secretariat of Industry of the Ministry of Development as the competent authority for the supervision of the development and operation of the business parks; b) provides the specifications of the procedure for audit and control of business parks; and c) the imposition of sanctions in case of violations of the legal framework regarding the operation of the business park.

- The Ministerial Decision no. 55732/2025, Official Journal YODD' 874/17.07.2025 (entered into force on its publication date as per Article 3 of the Decision), as per Article 46, paragraph 15b, of the Law (evidence 10). The Decision ensures the implementation of the provisions of the abovementioned Ministerial Decision no. 25386/2025 (i.e. evidence 9), and determines the compensation for the members of the audit committees for carrying out the audits.
- The Ministerial Decision no. 29577/2025, Official Journal B' 2025/28.04.2025 (entered into force on its publication date, as per Article 10 of the Decision), as per Article 46, paragraph 18 of the Law (evidence 11). The Decision provides the principles and evaluation criteria for the elaboration of a business plan for the development of business parks across Greece's territory on the basis of specific criteria. Furthermore, a detailed methodology for the evaluation of the criteria is described in this Decision.
- The Ministerial Decision no. 16942/2023, Official Journal B' 1093/28.02.2023 (entered into force on its publication date, as per Article 3 of the Decision), as per Article 46, paragraph 19 of the Law (evidence 12). The Decision operationalises Article 47, paragraph 9, of the Law, and provides for the documentation needed and procedure to be followed for subjecting the Organized Areas of Manufacturing and Business Activities in Greece, governed by older legal statutes (namely laws 4458/1965, 2545/1997 and 3982/2011) to the provisions of the Law i.e. foreseeing the conversion of their legal status to that of a business park. More specifically, the said areas must be subjected to the provisions of the Law within five years from the date on which the Law entered into force. This Decision aims to establish a single framework for businesses parks across Greece and to gradually replace within five years' time the three above-mentioned laws which were in force simultaneously, with each applying to different areas used for industrial activity, depending on the time of issuance of the approval of the

establishment of the Organised Area of Manufacturing and Business Activities. That is, the Decision, taken together with the relevant primary Law provisions, aim to eliminate the multiplicity of legal statuses pertinent for different types of areas in Greece designated for industrial use, and the variation in the rules that regulate their governance.

- The Joint Ministerial Decision no. 18211/2023, Official Journal B' 1147/28.02.2023 (entered into force on its publication date, as per Article 8 of the Decision), as per Article 46, paragraph 9 of the Law (evidence 13). The Decision provides for the details regarding: a) the establishment and operation of "large single-unit" business parks foreseen under Article 19 of the Law, along with the relevant spatial and urban conditions that need to be fulfilled; b) the procedure for the definition and zoning of large single-unit business parks; c) the necessary documentation, d) the internal organisation of large single-unit business parks; and e) their way of operation and management, thus contributing to legal clarity on this matter.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 317 Establishment of the quality policy and new regulatory framework for Quality infrastructure

**Related Measure:** 4,7.16543 Actions for the simplification of the business environment and its upgrading in quality and safety

**Qualitative Indicator:** Adopt a national strategy on quality infrastructure in Greece), and adopt necessary enabling regulation on standardization, metrology, accreditation and conformity assessment through necessary legislative acts (provide Official Journal reference); and adopt legislative amendments to law 3325/2005 (Part B) concerning the establishment, extension and modernisation of manufacturing activities in the Attica Region

**Time:** Q2 2024

### 1. Context:

The reform aims to create an attractive business environment conducive to investment, to facilitate firm entry and job creation, and to ensure effective market surveillance. The reform comprises of a set of actions to simplify procedures and requirements relating to business activity, while enhancing regulatory certainty and quality, namely by extending the simplification of investment licensing procedures to additional economic activities, reviewing the legislative framework for the operation of manufacturing activity in Attica region, and codifying fragmented licensing legislation. The reform also comprises of actions to improve the market surveillance framework, namely by reviewing quality policy on standardisation, accreditation and conformity, strengthening market surveillance structures and responsible authorities, and extend the surveillance framework to new inspection areas.

Milestone 317 requires (a) the development of a modern regulatory, organizational and operational framework for Quality Infrastructure in Greece, in line with Regulation 765/2008 concerning accreditation of conformity assessment bodies; and (b) entry into force of legislation to reform the regulatory framework concerning the installation of manufacturing activities in Attica with a view to eliminating excessively high restrictions that are non-proportional to policy objectives. The scope of (b) will cover the establishment of new industrial units and the modernisation of existing ones operating in Attica, as well as relocation and extension of existing installations in Attica.

Milestone 317 is the first step of the implementation of the reform. It will be followed by milestone 319, related to the entry into force of legislation to reform and take necessary actions to further improve the regulatory framework for the licensing and effective surveillance of businesses. The reform has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                           | Short description                                                                                                                                                                                                                                                    |
|---|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled |                                                                                                                                                                                                                                                                      |
| 2 | Law 5218_2025<br>Official Journal A' 125/14.07.2025                                                                            | Law no 5218/2025, on standardization, metrology, accreditation and conformity assessment, entered into force on 14 July 2025 (Articles 35-56), and on installation, operation and modernisation of manufacturing activities in the Region of Attica (Articles 57-64) |

|   |                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                          |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | Ministerial Decision no 55409/2025, issued by the Minister and Deputy Minister of Development<br><br>Published on DIAYGEIA portal 55409/15.07.2025 (ADA number: 60PA46NΛΞΞ-HOZ) | MD 55409/2025 regarding the adoption of a national strategy on quality infrastructure in Greece, entered into force on 15 July 2025                                                                                                                                                                                      |
| 4 | National Strategy on Quality Infrastructure in Greece                                                                                                                           | The copy of the full text of the national strategy as well as the abovementioned Ministerial Decision are published in the website <a href="https://www.ggb.gr/">https://www.ggb.gr/</a> with link ( <a href="https://www.ggb.gr/el/node/2314">https://www.ggb.gr/el/node/2314</a> ), where the strategy can be accessed |
| 5 | Ministerial Cabinet Act 18_2025<br><br>Official Journal A' 129/17.07.2025                                                                                                       | Ministerial Cabinet Act 18/2025 on the establishment of a Government Quality Committee, acting for the formulation, monitoring and evaluation of the national quality policy and supervising the operation of the governance mechanism of the Quality Infrastructures, entered into force on 17 July 2025 (Article 9)    |

### 3. Analysis:

The justification and substantiating evidence provided by the Greece authorities cover all constitutive elements of the milestone.

**(a) Develop a modern regulatory, organizational and operational framework for Quality Infrastructure in Greece, in line with Regulation 765/2008 concerning accreditation of conformity assessment bodies.** Furthermore, in line with the qualitative indicator, [...] **adopt necessary enabling regulation on standardization, metrology, accreditation and conformity assessment through necessary legislative acts (provide Official Journal reference)**, and in line with the description of the measure, **review quality policy on standardisation, accreditation and conformity.**

Greece demonstrated the fulfilment of this requirement through the adoption of law 5218/2025 (Part C, articles 35-56), regarding standardization, metrology, accreditation and conformity assessment, which was published on 14 July 2025 in Official Journal A' 125/ 14.07.2025 (evidence 2) (hereafter referred to as the «Law»). It entered into force with its publication in accordance with article 80 of that Law.

In particular, through the legal provisions, a National Quality Policy is established in Greece (article 39) in order to assist in the development of the national quality infrastructure system, based on modern regulatory standards, to ensure harmonization of the National Quality Infrastructures with national legislation and international and European requirements. The new Law aims to enhance the quality and safety of products, environmental and social well-being, and to promote a level-playing field among market players. From an operational point of view, the Law provides for a governance mechanism to ensure the effective implementation of the National Quality Policy (article 40) and the establishment of an intergovernmental policy mechanism to coordinate governmental actions and oversee effective implementation (article 41). It also provides for the establishment of a national digital registry of certifications and audits, helping the modernization of the framework regarding the Quality Infrastructures in Greece (article 42).

The Law also provides for organizational aspects. For instance, articles 43-44 contribute to a modern organizational framework by converting the “National Standardization Organisation” from a unit of “National System of Quality Infrastructures” to a Public limited company (PLC- société anonyme), with an autonomous legal personality. Access to the required human resources is also provided for, so that European specifications and requirements can be met.

Articles 48-49 of the Law include provisions regarding the National Institute of Metrology, covering operational and organizational issues, as well as issues of competence. Furthermore, they provide for the establishment of a National Metrology Board, within the National System of Quality Infrastructures, competent to give opinions on matters related to scientific metrology. Articles 52-53 and 55 of the Law provide for the conversion of the legal entity “National Accreditation System” from a private law legal entity to a Public limited company (PLC- société anonyme) under the name “National Accreditation System S.A.” with a separate legal personality (articles 52-53). Also, a National Accreditation Board has been established, in order to assist the abovementioned company (article 55).

The provisions on accreditation of the new framework are in line with Regulation (EC) 765/2008 concerning accreditation of conformity assessment bodies. The provisions establish a single national accreditation body and ensure the objectivity and impartiality of its activities as required by Regulation (EC) 765/2008. The new framework abides to principles of accreditation and regulates the functioning of accreditation in-line with Regulation (EC) 765/2008.

Further, Greece adopted the following secondary legislation acts to operationalize the provisions of law 5218/2025:

- The Ministerial Cabinet Act 18/2025 on the establishment of a Government Quality Committee (entered into force on 17 July 2025, as per Article 9 of the Act) (evidence 5). The said Act operationalises the provisions of Article 41 of Law 5218/2025. This Committee is responsible for the formulation, monitoring and evaluation of the national quality policy and will supervise the operation of the governance mechanism of the Quality Infrastructures.
- The Ministerial Decision 55409/2025 to adopt a national strategy on quality infrastructure in Greece (entered into force on its date of publication on 15 July 2025), as provided for in Article 51, paragraph 1, of Law 5218/2025 (evidence 3).

In line with the qualitative indicator, **adopt a national strategy on quality infrastructure in Greece**

Greece issued the abovementioned Ministerial Decision 55409/2025 to adopt a national strategy on quality infrastructure in Greece. The text of the strategy is attached as an annex to the Decision, and also uploaded on the website of the General Secretariat of Industry of the Ministry of Development, as foreseen under Article 51, paragraph 1, of Law 5218/2025 (link provided under evidence 4). The strategy analyses aspects such as current situation in Greece, comparative analysis of the national system with other EU and EEA Member States in relation to standardisation, metrology and accreditation, the vision, objectives and principles of National Quality Policy in Greece, and its governance system.

**(b) entry into force of legislation to reform the regulatory framework concerning the installation of manufacturing activities in Attica [..].** Furthermore, in line with the description of the measure, **review the legislative framework for the operation of manufacturing activity in Attica region**

Greece demonstrated the fulfilment of this requirement for the installation and operation of manufacturing activities in the region of Attica through the adoption of law 5218/2025 (Government Gazette A' 125/14.07.2025), and more specifically in Part D thereof, Articles 57-64 (evidence 2)

(hereafter referred to as the «Law»). The Law was published on 14 July 2025 and it entered into force on its publication in accordance with Article 80 of that law.

**with a view to eliminating excessively high restrictions that are non-proportional to policy objectives.**

Due to the concentration of a significant portion of Greece's industrial base in Attica, despite it being a highly urbanized and residential region the installation and operation of manufacturing activities, especially those falling under environmental category A2 ( i.e. the category in which projects and activities that may cause significant environmental impacts are classified), follows a more specific and stricter general framework than that applicable in the rest of the country.

The Law clarifies and removes legal contradictions in the institutional framework governing the establishment, modernization and expansion of manufacturing activities in the Attica region (law 3325/2005 (Part B)). The Law also reduces excessively high obstacles to the development and modernization of manufacturing and logistics activities in Attica whilst adhering to policy objectives with respect to social and environmental protection, primarily allowing for additional possibilities for installation and modernisation of environmental category A2 activities when they are located within compatible land uses or within business parks. In particular, the following provisions are introduced, which contribute to a more proportional and balanced framework to policy objectives:

- Article 59 of the Law (which amends Article 14, paragraphs 1 and 2 of law 3325/2005) foresees the mandatory implementation of an environmental management system for manufacturing and logistics activities of environmental category A, which serves the objective of environmental sustainability.
- Article 60 of the Law (which amends Article 16 of law 3325/2005), allows manufacturing activities of A2 environmental category activities to modernise their facilities when these are located within compatible land uses or within business parks. The same applies to activities within business parks that fall into category B and to those that remain in category A2, which was not the case under the previous institutional framework.
- Article 61 of the Law (which amends Article 17 of law 3325/2005) allows the establishment of manufacturing activities belonging to category A2 in East and West Attica where industrial use of land is foreseen, provided that these activities have been included in the provisions of law 4864/2021, related to strategic investments (A' 237). The said Article also facilitates the installation of category A2 units located within business parks, with the same rules that apply throughout Greece. Lastly, the said Article provides for the possibility to install infrastructures of environmental waste storage and processing within Attica.
- Article 62 of the Law (which amends Article 19 of law 3325/2005) facilitates the relocation of manufacturing facilities within Attica by extending the possibility of relocation to wholesale trade zones.
- Article 64 of the Law repeals the restrictive provisions of Article 14, paragraph 5 of law 3325/2005 (A' 68) (related to the environmental upgrading of facilities within the Attica region), of Article 15 of law 3325/2005 (related to the determination of environmental upgrading zones), and of Article 23 of law 3325/2005 (related to the possibility of extending the restrictions to other areas outside the Attica region).

**The scope of (b) shall cover the establishment of new industrial units and the modernisation of existing ones operating in Attica, as well as relocation and extension of existing installations in Attica. Furthermore, in line with the qualitative indicator, adopt legislative amendments to law 3325/2005 (Part B) concerning the establishment, extension and modernisation of manufacturing activities in the Attica Region**

The provisions of the new Law amend the earlier framework under law 3325/2005 (Part B concerning the establishment, extension and modernisation of manufacturing activities in the Attica Region). In particular:

- Article 60 of the Law amends Article 16 of law 3325/2005, introducing clarity on the framework for the modernization and extension of existing manufacturing facilities within Attica. The said article also harmonises the provisions of the Law with other national legislation on environmental classification of business activities (namely by abolishing the concept of nuisance), as well as by replacing the criteria of installed capacity with the criteria of environmental classification (in terms of raw material or in terms of the product produced).
- Article 61 of the Law amends Article 17 of law 3325/2005, introducing clarity on the installation of new industrial units within Attica, for cases where such units are established within business parks. Further, the said article expands the possibility for the installation of new manufacturing activities or logistics within agricultural land or in the unplanned area, under certain conditions.
- Article 62 of the Law amends Article 19 of law 3325/2005, providing for the relocation of existing manufacturing activities within Attica.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 318 Improvement of business environment - ease doing business

**Related Measure:** 4,7.16591 Ease of doing business

**Qualitative Indicator:** For actions that require legislation: Publication of legislation in Official Journal (Official Journal reference)

For interoperability functions, platforms and registries: Operationalisation of systems (attested by a report)

Delivery of equipment for equipment (attested by report and proof of purchase)

Completion of campaigns and issuance of guidelines (attested by issued guidelines/circulars)

**Time:** Q2 2024

### 1. Context:

The reform aims to improve the business environment and to ease the administrative and regulatory burden on businesses, namely in the areas of getting credit, getting electricity, registering property, and getting a construction permit, by reducing procedures, time and the cost and ensuring a stable and predictable legislative framework. Specifically, it comprises of a series of interventions to reduce the complexity of processes, the cost, and time involved in each of the abovementioned areas, as well as training of public sector staff involved in such processes and outreach activities to key stakeholders.

Milestone 318 concerns the completion of the reform to reduce complexity of procedures, time and cost in four sub-areas: getting credit, obtaining an electricity connection, registering property, and getting a construction permit.

Milestone 318 is the only milestone of this reform. The reform has a final expected date for implementation of 30 June 2024.

### 2. Evidence provided:

|                                      | Name of the evidence                                                                                                                                                                                                                                                                                                                         | Short description                                                                                                                                                                                                                      |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                    | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                                               |                                                                                                                                                                                                                                        |
| 2                                    | Report by the Ministry of Digital Governance                                                                                                                                                                                                                                                                                                 | Report by the Ministry of Digital Governance describing full completion of the reforms: Getting Credit and Registering Property. The report is dated 4 July 2025.                                                                      |
| <b>Requirement 1: Getting Credit</b> |                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                        |
| <i>Requirement 1.1: Legislation</i>  |                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                        |
| 3                                    | Law 5123/2024 (Official Journal A'/109/19.07.2024)<br><br>Entry into force: Parts A and B of this law entered into force on the date of the publication of the Decision foreseen under Article 24, paragraph 1, of the law i.e. on the 30 June 2025. Part C entered into force on 19 July 2024, with the exception of Article 27 of the law, | The law concerns the modernization of the institutional framework for secure transactions and establishment of a Unified Electronic Register of secure transactions on movable property, claims and other rights and other provisions. |

|                                                         |                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                       |
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|                                                         | which entered into force on 16 September 2024 (as foreseen under Article 31 of Law 5123/2024).                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                       |
| 4                                                       | <p>Joint Ministerial Decision by the Minister of Justice and the Minister of Digital Governance 41802 ΕΞ 2024/16.12.2024 (Official Journal Β' 7024/20.12.2024)</p> <p>Entry into force: date of publication, i.e. 16 December 2025 (as provided in the preamble)</p> | Amendment of the entry into force of the Law 5123/2024 regarding "Modernization of the institutional framework for secure transactions and establishment of a Unified Electronic Register of secure transactions on movable property, claims and other rights and other provisions" (Α' 109). The Decision postpones the entry into force of Part Β of law 5123/2024 to 30 June 2025. |
| 5                                                       | <p>Decision 354/5/16.05.2025 of Board of Directors of Hellenic Cadastre (Official Journal Β' 2882/10.06.2025)</p> <p>Entry into force: date of publication, i.e. 10 June 2025, as per article 5</p>                                                                  | The Decision concerns the procedure for the submission of deeds for registration, the supporting documents to be submitted and the data to be recorded when submitting the deeds, their amendments and changes, including their elimination, as well as the procedure for issuing certificates and extracts from the books.                                                           |
| 6                                                       | <p>Decision 362/13/26.06.2025 of Board of Directors of Hellenic Cadastre (Official Journal Β' 3333/30.06.2025)</p> <p>Entry into force: date of publication, i.e. 30 June 2025</p>                                                                                   | The Decision of concerns the determination of the time of the commencement of the operation of the Electronic Register of Secure Transactions                                                                                                                                                                                                                                         |
| <b>Requirement 1.2: Register of Secure Transactions</b> |                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                       |
| 7                                                       | Implementation contract (ADAM: 25SYMV016804578 2025.05.13)                                                                                                                                                                                                           | Contract signed between the contractor and the Director General of the Hellenic Cadastre for the implementation of the Register of Secure Transactions. Signed 13 May 2025.                                                                                                                                                                                                           |
| 8                                                       | Deliverable by the contractor of pilot of the Registry                                                                                                                                                                                                               | Deliverable Π.2.1 delivered by the contractor of pilot application of the Registry and operation of the platform running in a productive environment. Dated 12 May 2025.                                                                                                                                                                                                              |
| 9                                                       | Acceptance Protocol (2527846/26.06.2025)                                                                                                                                                                                                                             | Acceptance Protocol signed by the members of the Receiving Committee on behalf of the contracting authority for the pilot application and trial period of the platform running on a productive environment. Dated 26 June 2025.                                                                                                                                                       |
| <b>Requirement 2: Getting Construction Permit</b>       |                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                       |
| 10                                                      | Report by the Ministry of Environment and Energy (Protocol Number: ΥΠΕΝ/ΥΠΓΡ/78740/5655)                                                                                                                                                                             | Report from the Ministry of Environment and Energy on the fulfilment of milestone 318 for projects. Dated 15 July 2025.                                                                                                                                                                                                                                                               |
| 11                                                      | Report by the Ministry of Climate Change and Civil Protection                                                                                                                                                                                                        | Report from the Ministry of Climate Change and Civil Protection demonstrating full completion of the reform to reduce complexity of procedures, time and cost in getting a construction permit and all their specific subprojects and                                                                                                                                                 |

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|-------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | actions, justifying how the implemented actions have led to achieving the objective of the reform as per CID Annex. Dated 15 July 2025.                                                                                                                                                                                      |
| <i>Requirement 2.1.a: Interconnection of e-adeies system with the Fire Departments of the country</i>             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                              |
| 12                                                                                                                | Confirmatory Act 32244/20.12.2021 signed by the President of the Technical Chamber of Greece (ADA: ΨΓΔ346Ψ842-B7Φ)                                                                                                                                                                                                                                                                                                                                                   | Confirmatory Act by the President of the Technical Chamber of Greece confirming adjustment of the operation of the information system "e-adeies" of Law 4495/2017 for the issuance of approvals and certificates from the Fire Department. Dated 20 December 2021.                                                           |
| 13                                                                                                                | Ministerial Decision issued by the Deputy Minister of Environment and Energy ΥΠΕΝ/ΔΑΟΚΑ/93311/3679 (Journal B' 4874/21.10.2021)<br><br>Entry into force: date of publication, i.e. 21 October 2021, as per article 3                                                                                                                                                                                                                                                 | The Decision concerns the issuance of approvals and certificates from the Fire Department through the "e-adeies" system (Interconnection of e-adeies system with the Fire Departments of the country.) Dated 21 October 2021.                                                                                                |
| 14                                                                                                                | Ministerial Decision issued by Deputy Ministry of Development ΥΠΕΝ/ΔΑΟΚΑ/47319/1946 (Official Journal B' 2090/20.05.2021)<br><br>Entry into force: date of publication, i.e. 20 May 2021, as per article 3                                                                                                                                                                                                                                                           | The Decision concerns the issuance of approvals and certificates from the Fire Department through the "e-adeies" system (Interconnection of e-adeies system with the Fire Departments of the country). Dated 20 May 2021.                                                                                                    |
| 15                                                                                                                | Ministerial Decision 69019 issued by the Deputy Minister of Climate Change and Civil Protection (Official Journal B' 5519/29.11.2021 - Approval of Fire Regulation No. 13/2021 (Official Journal B' 5519/29.11.2021)<br><br>Entry into force: date of start of operation of system, entry into force on date set as per the Confirmatory Act signed by the President of the Technical Chamber of Greece (under evidence 12), as per article 17 i.e. 20 December 2021 | The Decision concerns the determination of the procedure for submitting the required supporting documents, inspection, and issuance of administrative fire protection acts for businesses – facilities, in application of Article 167 of Law 4662/2020. Dated 29 November 2021.                                              |
| <i>Requirement 2.1.b: Integration of e-adeies with EFKA</i>                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                              |
| 16                                                                                                                | Confirmatory Act 19517/06.05.2025 issued by the President of the Technical Chamber of Greece (ADA: ΨΧ7Α46Ψ842-Ω2Ζ)                                                                                                                                                                                                                                                                                                                                                   | The Act concerns the confirmation of the interoperability of the information system "e-adeies", with the Integrated Information System of 'e-EFKA' for the transmission of data regarding permits of the type 'Small-Scale Construction Work Approvals (EEDMK) (Integration of e-adeies system with EFKA). Dated 6 May 2025. |
| <i>Requirement 2.1.c: Integration of e-adeies with HEDNO (Hellenic Electricity Distribution Network Operator)</i> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                              |

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|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 17                                                                                         | Confirmatory Act issued by the President of the Technical Chamber of Greece (ADA: 98TA46Ψ842-IEX)                                                                                                                                                               | The Act concerns the–issuance of the certificate of commencement of the connection to public utility networks via the "e-adeies" information system (Integration of e-adeies with HEDNO (Hellenic Electricity Distribution Network Operator). Dated 20 July 2022.                                               |
| 18                                                                                         | Joint Ministerial Decision issued by Minister of Environment and Energy and Minister of State ΥΠΕΝ/ΔΑΟΚΑ/123669/4743/23.12.2021 (Official Journal B' 6548/31.12.2021)<br><br>Entry into force: date of publication, i.e. on 31 December 2021, as per article 10 | The Decision concerns the information required for the issuance and verification of the certificate of connection to the Electricity Distribution Network during the electrification process (Integration of e-adeies with DEDDHE (Hellenic Electricity Distribution Network Operator). Dated 31 December 2021. |
| <i>Requirement 2.1.d: Integration of e-adeies with Natural Gas &amp; Forestry Services</i> |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                 |
| 19                                                                                         | Confirmatory Act 45334/21.11.2024 issued by the President of the Technical Chamber of Greece (ADA: ΨΩΩ46Ψ842-ΛPN)                                                                                                                                               | The Act concerns the adjustment of the operation of the information system "e-adeies" of Law 4495/2017 for the electronic certification of Gas Fuel Studies (Integration of e-adeies with Natural Gas & Forestry Services). Dated 21 November 2024.                                                             |
| 20                                                                                         | Ministerial Decision issued by the Minister and the Deputy Minister of Environment and Energy ΥΠΕΝ/ΓΓΧΣΑΠ/110210/47/1 1.9.2024 (Official Journal B' 5980/29.10.2024)<br><br>Entry into force: data of publication, i.e. 29 October 2024, as per Article 4       | The Decision concerns the establishment of electronic services related to the issuance of approvals and certificates by entities through the "e-adeies" system (Integration of e-adeies with Natural Gas & Forestry Services). Dated 29 October 2024.                                                           |
| 21                                                                                         | Confirmatory Act 24576/02.06.2025, issued by the President of the Technical Chamber of Greece (ADA: 6Φ0546Ψ842-501)                                                                                                                                             | The Act –concerns the adjustment of the operation of the information system "e-adeies" for the electronic issuance of certificates by Forestry Services. Dated 2 June 2025.                                                                                                                                     |
| 22                                                                                         | Law 4782/2021 (Official Journal A'/36/09.03.2021), Article 215<br><br>Entry into force: date of publication, i.e. 9 March 2021, as per Article 253                                                                                                              | The said article describes the procedure for submitting approvals for the issuance of building permits. Dated 9 March 2021.                                                                                                                                                                                     |
| <i>Requirement 2.2: Implement outreach campaigns with private sector stakeholders</i>      |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                 |
| 23                                                                                         | Request for Proposals by the Ministry of Environment and Energy, Unique Publication ID                                                                                                                                                                          | Call for expression of interest signed by the Secretary General for Spatial Planning and Urban Environment via shortlist (below-threshold tender procedure) through the Hellenic Electronic Public Procurement System (ESHDIS), for the                                                                         |

|                                                             |                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|                                                             | ADAM: 25PROC016340922<br>2025.02.19                                                                                                                                      | Assignment of the project "Campaigns to approach stakeholders in the private sector (engineers and construction companies)" of the Measure 16591 – Ease of doing business.<br>Dated 19 February 2025.                                                                                                                                                                                                                                                               |
| 24                                                          | Deliverables submitted by the contractor                                                                                                                                 | Deliverables Π1, Π2 and Π3 of the service with objective the subproject 14" "Campaigns to approach stakeholders in the private sector (engineers and construction companies)" of the Measure 16591 – Ease of doing business". Dated March 2025.                                                                                                                                                                                                                     |
| 25                                                          | Final Acceptance Protocol of the Deliverables Π1, Π2 and Π3 with protocol number<br>ΥΠΕΝ/ΔΜΕΑΑΠ/59167/373/29-05-2025                                                     | Final Acceptance Protocol signed by the Secretary General for Spatial Planning and Urban Environment of the Deliverables Π1, Π2 and Π3 with protocol number<br>ΥΠΕΝ/ΔΜΕΑΑΠ/59167/373/29-05-2025 of the service with objective the subproject 14" "Campaigns to approach stakeholders in the private sector (engineers and construction companies)" of the Measure 16591 – Ease of doing business".<br>Dated 29 May 2025.                                            |
| <b>a. Requirement 2.3: Equipping and training of staff</b>  |                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 26                                                          | Request for Proposals by Technical Chamber of Greece, Unique Publication ID (ADAM)<br>24PROC014832171 2024.05.28                                                         | Call for expression of interest signed by the Head of the Department for Protocol and Customer Service of the Technical Chamber of Greece via National System of Electronic Public Procurement (ESIDIS) for the selection of a contractor for the "Supply of electronic equipment within the framework of the implementation of the "Equipment for Building Services (YDOM) users' of the Measure '16591 - Faster issuance of building permits". Dated 28 May 2024. |
| 27                                                          | Contract for the supply of electronic equipment (Unique Publication ID (ADAM)<br>24SYMV015787767 2024.11.18)                                                             | Contract signed between the President of the Technical Chamber of Greece and the contractor for the supply of electronic equipment within the framework of the implementation of the project 'Equipment for Building Services (YDOM) users' of the Measure"16591 – Faster issuance of building permits" (Equipment for Building Services (YDOM) users) . Dated 15 November 2024.                                                                                    |
| 28                                                          | Decision A32/Σ4/2025 by the Governing Committee of the Technical Chamber of Greece<br>Protocol Number: ΤΥΟΔΠΕ/164/6-2-2025, ADA: 911146Ψ842-Ψ01                          | The Decision provides a detailed list that defines the allocation of the newly acquired equipment to the planning services. Dated 2 June 2025.                                                                                                                                                                                                                                                                                                                      |
| 29                                                          | Final Acceptance Protocol (12085/2025.03.18) of the contract, signed by the head of the General Directorate of Works Development and Scientific and Professional Matters | Final Acceptance Protocol (12085/2025.03.18) of the contract 'Supply of electronic equipment within the framework of the implementation of Subproject 15A: Equipment for Building Services (YDOM) users of Action 16591 - Faster issuance of building permits. Dated 18 March 2025.                                                                                                                                                                                 |
| 30                                                          | Link as evidence                                                                                                                                                         | Recording of the online training for individual engineers on 31 March 2025<br>Link: <a href="https://www.youtube.com/watch?v=x-8M4KJ05pg">https://www.youtube.com/watch?v=x-8M4KJ05pg</a>                                                                                                                                                                                                                                                                           |
| 31                                                          | Link as evidence                                                                                                                                                         | Recording of online training for Building Services (YDOM) users on January April 2025<br>Link: <a href="https://www.youtube.com/watch?v=CjVhWrIjxoc">https://www.youtube.com/watch?v=CjVhWrIjxoc</a>                                                                                                                                                                                                                                                                |
| <b>b. Requirement 2.4: Guidelines made available online</b> |                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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| 32                                                    | Request for Proposals by the Ministry of Environment and Energy, with unique publication ID (ADAM) 24PROC014716441 2024-05-02. Protocol Number: ΥΠΕΝ/ΓΡΓΓΧΣΑΠ/48878/2690 with date 02/05/2024 | Call for expression of interest signed by the Secretary General for Spatial Planning and Urban Environment via shortlist (below-threshold tender procedure) through the Hellenic Electronic Public Procurement System (ESHDIS), for the Assignment of the project 'Guidelines and Requirements for Building Permits Across Greece' of the Measure 16591. Dated 2 May 2025. |
| 33                                                    | Contract of with unique publication ID (ADAM) 24SYMV015050668 2024-07-02                                                                                                                      | Contract signed between the Secretary General for Spatial Planning and Urban Environment and the contractor for Subproject 16: "Guidelines and Requirements for Building Permits Across Greece". Dated 2 July 2024.                                                                                                                                                        |
| 34                                                    | Deliverable Π1, provided by contractor                                                                                                                                                        | Deliverable Π1: Definition of requirements & case study analysis of the project 'Guidelines and Requirements for Building Permits Across Greece' of the Measure 16591. Dated 2 September 2024.                                                                                                                                                                             |
| 35                                                    | Deliverable Π2, provided by contractor                                                                                                                                                        | Deliverable Π2: Development of a building permit requirements checklist of the project 'Guidelines and Requirements for Building Permits Across Greece' of the Measure 16591. Dated 2 September 2024.                                                                                                                                                                      |
| 36                                                    | Deliverables Π3 & Π4, provided by contractor                                                                                                                                                  | Deliverables Π3 & Π4: Communication of guidelines for building permits to the public and development of a website of the project 'Guidelines and Requirements for Building Permits Across Greece' of the Measure 16591. Dated 2 December 2024.                                                                                                                             |
| 37                                                    | Approval decision of the Acceptance protocol for Deliverables Π1 and Π2 (ADA: Ρ7ΜΚ4653Π8-2ΝΞ)                                                                                                 | Approval decision signed by the Secretary General for Spatial Planning and Urban Environment of the Acceptance protocol for Deliverables Π1 and Π2 of the service related to the project 'Guidelines and Requirements for Building Permits Across Greece' of the Measure 16591. Dated 23 January 2025.                                                                     |
| 38                                                    | Approval decision of the Acceptance protocol for Deliverables Π3 and Π4 (ADA: ΕΒΥΞ4653Π8-ΔΑΚ)                                                                                                 | Approval decision signed by the Secretary General for Spatial Planning and Urban Environment of the Acceptance protocol for Deliverables Π3 and Π4 of the service related to the project 'Guidelines and Requirements for Building Permits Across Greece' of the Measure 16591. Dated 2 May 2025.                                                                          |
| <i>Requirement 2.5: Fee schedule available online</i> |                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                            |
| 39                                                    | Link as evidence                                                                                                                                                                              | Regarding the fee schedule available online: <a href="https://permit-costs.gr/">https://permit-costs.gr/</a>                                                                                                                                                                                                                                                               |
| 40                                                    | Request for proposals by Ministry of Environment and Energy, unique publication ID (ADAM) 24PROC014791367 2024-05-21)                                                                         | Call for expression of interest signed by the Secretary General for Spatial Planning and Urban Environment via shortlist (below-threshold tender procedure) through the Hellenic Electronic Public Procurement System (ESHDIS), for the Assignment of the project "Creation of an Online Application for the Cost of Issuing a Building Permit". Dated 21 May 2024.        |
| 41                                                    | Contract with unique publication ID<br>ADAM: 24SYMV015135882 2024-07-16                                                                                                                       | Contract signed between the Secretary General for Spatial Planning and Urban Environment and the contractor for the project "Creation of an Online Application for the Cost of Issuing a Building Permit". Dated 16 July 2024.                                                                                                                                             |

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| 42                                                                                   | Deliverables Π1 & Π2, provided by the contractor                                                                                                                                                                                                                                               | Deliverables Π1 & Π2: Development of an algorithm & content related to the cost of issuing a building permit of the project "Creation of an Online Application for the Cost of Issuing a Building Permit". Dated 16 September 2024.                                                                                                                            |
| 43                                                                                   | Deliverable Π3, provided by the contractor                                                                                                                                                                                                                                                     | Deliverable Π3: Development of a website for calculating building permit issuance cost of the project "Creation of an Online Application for the Cost of Issuing a Building Permit". Dated 16 December 2024.                                                                                                                                                   |
| 44                                                                                   | Approval decision of Acceptance Protocol for Deliverables Π1 and Π2 (ADA: P4ΨΣ4653Π8-ΓΡΦ)                                                                                                                                                                                                      | Approval decision signed by the Secretary General for Spatial Planning and Urban Environment of Acceptance Protocol for Deliverables Π1 and Π2 of the service related to the project "Creation of an Online Application for the Cost of Issuing a Building Permit"                                                                                             |
| 45                                                                                   | Approval decision of Acceptance Protocol for Deliverable Π3 (ADA: Ψ0Ε14653Π8-ΥΩΩ)                                                                                                                                                                                                              | Approval decision signed by the Secretary General for Spatial Planning and Urban Environment of Acceptance Protocol for Deliverable Π3 for the service related to the project "Creation of an Online Application for the Cost of Issuing a Building Permit".                                                                                                   |
| <i>Requirement 2.6: Instate digital inspection functions for the Fire Department</i> |                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                |
| 46                                                                                   | Decision 66913 οικ. Φ.708.1-29.12.2023 by the Chief of the Fire Department (Official Journal B'/7783/31.12.2023)<br><br>Entry into force: date of its publication, i.e. 31 December 2023, as per Article 2                                                                                     | The Decision concerns the Reports/Complaints Management System (RCMS) for violations of economic operators and installations under the regulatory fire protection provisions of the Fire Department's jurisdiction. Dated 31 December 2023.                                                                                                                    |
| 47                                                                                   | Joint Ministerial Decision 8484 οικ. Φ.708.2-20.03.2024 between the Deputy Minister of Development and the Deputy Minister of Climate Change and Civil Protection (Official Journal B'/1902/28.03.2024)<br><br>Entry into force: date of its publication, i.e. 28 March 2024, as per Article 3 | The Decision concerns the Risk Assessment and Classification of Economic activities/ facilities into risk levels – Methodology for Planning, Programming, and Frequency of Inspections within the Framework of Supervising Economic Activities/Installations under the Fire Protection Regulations of the Fire Department's jurisdiction. Dated 28 March 2024. |
| 48                                                                                   | Decision 53905 οικ. Φ.708.3 29.10.2024 by the Chief of the Fire Department Official Journal B'/5967/29.10.2024<br><br>Entry into force: 1 January 2025, as per Article 7                                                                                                                       | The Decision concerns the inspection checklists for conducting inspections of Economic Operators and installations subject to the regulatory fire protection provisions under the jurisdiction of the Fire Department. Dated 29 October 2024.                                                                                                                  |
| 49                                                                                   | Decision 65917 οικ. Φ.708.4 13.12.2024 by the Chief of the Fire Department (Official Journal B'/7069/23.12.2024)                                                                                                                                                                               | The Decision concerns the Compliance Action Model (CAM) in Cases of violations resulting from inspections of Economic Operators and installations subject to the fire protection regulations under the jurisdiction of the Fire Department. Dated 23 December 2024.                                                                                            |

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|                                           | Entry into force: 1 January 2025, as per Article 5                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 50                                        | <p>Joint Ministerial Decision 10236 οικ. Φ.708.5-19.03.2025 by the Deputy Minister of Development and the Deputy Minister of Climate Change and Civil Protection (Official Journal B'/1686/07.04.2025)</p> <p>Entry into force: date of its publication, i.e. 7 April 2025, as per Article 13</p> | The Decision concerns the definition and the procedure for the imposition of administrative measures and sanctions on economic entities and facilities for violations of fire protection regulations under the jurisdiction of the Fire Corps. Dated 7 April 2025.                                                                                                                                                                                                                                                                                                                        |
| 51                                        | Decision 17863 οικ. Φ.701.1-08.04.2025 by the Director of the Legal Services of the Fire Department                                                                                                                                                                                               | The Decision is published on the official website of Fire Service and provides the guide regarding informing the economic entities and facilities about the new regulations concerning supervision actions and the mediation between supervising authorities and businesses, by introducing/establishing a learning process through which businesses acquire the necessary skills to meet compliance requirements in their daily practices. Dated 8 April 2025. The Decision is not published in the Official Gazette, but uploaded on the Fire Service website as per Circular 54/A.Π.Σ) |
| 52                                        | Request for Proposals by Fire Service (ADAM 24PROC014282427 2024-02-19)                                                                                                                                                                                                                           | Call for expression for interest signed by the Chief of Staff, and the Lieutenant General of the Fire Service inviting the economic entities "ΠΛΑΙΣΙΟ COMPUTERS A.E.B.E." and "Dixons South Europe A.E.B.E." to submit offers for the supply of 32" PC Monitors, 27" FHD PC Monitors and TABLET. Dated 19 February 2024.                                                                                                                                                                                                                                                                  |
| 53                                        | Contract (ADAM: 24SYMV015461351 2024-09-20)                                                                                                                                                                                                                                                       | Contract (signed between the Chief of Staff, and the Lieutenant General of the Fire Service and the contractor) of 20 September 2024 between the Ministry of Climate Crisis and Civil Protection and the economic operator "DIXONS SOUTH - EAST EUROPE ΑΝΩΝΥΜΗ ΕΜΠΟΡΙΚΗ ΚΑΙ ΒΙΟΜΗΧΑΝΙΚΗ ΕΤΑΙΡΕΙΑ ΗΛΕΚΤΡΙΚΩΝ ΠΛΗΡΟΦΟΡΙΚΗΣ ΤΗΛΕΠΙΚΟΙΝΩΝΙΩΝ ΚΑΙ ΑΣΦΑΛΙΣΤΙΚΩΝ ΔΙΑΜΕΣΟΛΑΒΗΤΩΝ". Dated 20 September 2024.                                                                                                                                                                                       |
| 54                                        | Acceptance Protocol (ADAM: 24SYMV015461351)                                                                                                                                                                                                                                                       | Acceptance Protocol issued by the President and the Members of the Receiving Committee on behalf of the contracting authority regarding the 2617/2024 contract for the supply of IT equipment to the Fire Service. Dated 24 October 2024.                                                                                                                                                                                                                                                                                                                                                 |
| <b>Requirement 3: Getting Electricity</b> |                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 55                                        | Certification of Completion issued by the Director of Customer Service of the Hellenic Electricity Distribution Network Operator S.A. (HEDNO).                                                                                                                                                    | Certification of completion of the IT application upgrade for the declaration of square meters by the Municipalities                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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| 56                                         | End User Manual                                                                                                                                                                                                                                                                                                                                                                                                                | End User Manual prepared by HEDNO for the Application of Property Fees & Information of Municipalities. Issued on 15/11/2024.                                                                                                                                                                                                                                                 |
| <b>Requirement 4: Registering Property</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                               |
| 57                                         | Link as evidence                                                                                                                                                                                                                                                                                                                                                                                                               | Regarding the e-platform that enables purchasers to complete all requirements for transferring property online:<br><a href="https://akinita.gov.gr/">https://akinita.gov.gr/</a>                                                                                                                                                                                              |
| 58                                         | Law 5076/2023 (Official Journal A'/207/13.12.2023)<br><br>Entry into force: date of its publication, i.e. 13 December 2023, as per Article 35                                                                                                                                                                                                                                                                                  | The Law concerns the acceleration of the completion procedures of the Hellenic Cadastre: Handling of pending issues in property transfers and strengthening the operation of the Hellenic Cadastre - Simplification and acceleration of property transfer procedures (including the submission of a registered deed via an electronic property file). Dated 13 December 2023. |
| 59                                         | Joint Ministerial Decision issued by Minister of Finance, Minister of Labour and Social Insurance, Minister of Environment and Energy, Minister of Digital Governance, Minister of State, and the Governor of the Independent Authority for Public Revenue 1617/06.03.2023 (Official Journal B' 1396/09.03.2023)<br><br>Entry into force of the pilot operation: date of its publication, i.e. 9 March 2023, as per Article 10 | The Decision concerns the Pilot Operation of the "Electronic Real Estate File" platform for carrying out real estate transactions. Dated 9 March 2023.                                                                                                                                                                                                                        |
| 60                                         | Joint Ministerial Decision issued by Minister of Finance, Minister of Labour and Social Insurance, Minister of Environment and Energy, Minister of Digital Governance, and the Governor of the Independent Authority for Public Revenue 109 /ΕΞ 2024/03.01.2024 (Official Journal B' 2/03.01.2024)<br><br>Entry into force of operation in a productive environment: 1 January 2024, as per Article 9                          | The Decision concerns the determination of the operation of the "Electronic Property File" platform and the execution of real estate transactions in replacement of the Joint Ministerial Decision no. 1617 (B 1396/09.03.2023). Dated 3 January 2024.                                                                                                                        |
| 61                                         | Report 2527686/25.06.2025 of Hellenic Cadastre for creation of Platform.                                                                                                                                                                                                                                                                                                                                                       | Report signed by the Director General of the Hellenic Cadastre regarding the initial creation of a beta platform with its own resources (in house) and additionally the integration of                                                                                                                                                                                        |

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|    |                                                                                    | further functions through a contract resulting from a public tender. Dated 25 June 2025.                                                                                                                                |
| 62 | Contract for Registering Property (24SYMV015456915)                                | Contract signed between Information Society S.A. and the contractor for additional functionality of the platform enabling the completion of all requirements for transferring property online. Dated 20 September 2024. |
| 63 | Acceptance Decision Phase 1 (23982/21.10.2024)                                     | Acceptance Decision by the Chief Executive Officer of Information Society S.A. of Phase 1 of the Project's Deliverables. Dated 21 October 2024.                                                                         |
| 64 | Acceptance Decision Phase 2 (5740/19.03.2025)                                      | Acceptance Decision by the Chief Executive Officer of Information Society S.A. of Phase 2 of the Project's Deliverables. Dated 19 March 2025.                                                                           |
| 65 | Acceptance Decision Phase 3 and final acceptance of the project (15948/03.07.2025) | Acceptance Decision by the Chief Executive Officer of Information Society S.A. of Phase 3 and final acceptance of the project. Dated 3 July 2025.                                                                       |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Complete the reform to reduce complexity of procedures, time and cost in four sub-areas: getting credit, obtaining an electricity connection, registering property, and getting a construction permit**  
**Specifically, the reform will include the following subprojects and actions:**

#### 1. Getting credit

##### - Establish modern and reliable regulatory framework on securities in movable assets

Greece has adopted the Law 5123/2024 to establish a modern and reliable regulatory framework on securities in movable assets (evidence 3), as amended by Decision 41802 ΕΞ 2024/16.12.2024 (evidence 4). Parts A and B of this law entered into force on the date of the publication of the Decision foreseen under Article 24, paragraph 1, of the law i.e. on 30 June 2025 (evidence 6 below), and part C of the law entered into force on 19 July 2024, with the exception of Article 27 of the law, which entered into force on 16 September 2024 (as foreseen under Article 31 of Law 5123/2024). Article 1 states that the purpose of the law "is to create a comprehensive, coherent, and modern legal framework around the security of the collateral, in order to adapt it to the new technological and legal situation on the basis of European and international good practice, in order to address problems identified in the area of the provision of credit and financing through the provision of insurance on movable property, claims and other rights."

Greece has also provided the Decision of the Board of Directors of the Hellenic Cadastre (evidence 5). Article 1 of this decision outlines the process for submitting an application for registration of acts in the Electronic Register. The Decision entered into force on its date of publication, which is on 10 June 2025, as per article 5 of the Decision. Decision 362/13/26.06.2025 of the Board of Directors of the Hellenic Cadastre (evidence 6) sets the time of the commencement of the full operation of the Electronic Register of Secure Transactions as 30 June 2025. The Decision entered into force on its date of publication, which is on 30 June 2025.

##### - Establish a register of secure transactions

Greece has provided the contract for the implementation of the registry (evidence 7), which details the contractual obligations and functional requirements for the contractor to develop an electronic registry

under the Hellenic Cadastre that will host all the relevant information concerning the securities in movable assets, as well as the pledges or assignments of claims or other rights. It also details the content and purpose of the registry, which is to support the functioning of a securities transaction system with the aim to ensure the transparency, security and reliability of the information hosted (pages 3-48).

The registry is currently running on the productive environment. This is confirmed with the contract with VODAFONE PANAFON (evidence 7) for “Implementation – Completion – Installation – Development – Implementation – Integration Services Installation – deployments’ of the project ‘Creation of an electronic register of pledges”. It is further confirmed with the Acceptance Protocol (evidence 9) which in Article 2 acknowledges receipt of deliverable “Pilot Application – Test Operation of the Digital Security Information System installed in a productive environment’ by VODAFONE PANAFON ANONYMI Hellenic Telecommunications Company’ (evidence 8).

The Commission services conducted an on-the-spot check on 15 July 2025 to verify that the register of secured transactions is established and operational. This check was completed successfully, confirming that the register is operational and used by accredited users, following the issuance of the Decision listed above (evidence 6) setting the commencement of operation as of 30 June 2025.

## **2. Getting Construction Permit**

### **- Achieve operational interoperability between e-adeies system for construction permits with other public systems**

This project concerns the interoperability between e-adeies system i.e. the electronic system for issuing construction permits with other public systems. It was achieved through the development of several interoperability functionalities with other systems, or by directly embedding certain functionalities for the issuance of permits and approvals by other public systems, directly into the e-adeies system, as described below.

#### *Interconnection of e-adeies system with the Fire Departments of the country.*

The Greek authorities have provided the Ministerial Decision 4874/2021 by the Minister of Environment and Energy (evidence 13). In line with Article 1, the issuance of approvals and certificates by the Fire Services is carried out through the electronic system e-adeies. The Decision entered into force on the date of its publication 21 October 2021.

The Greek authorities have also provided Ministerial Decision 5519/2021 by the Minister for Climate Crisis and Civil Protection (evidence 15), which defines the process for submitting the necessary documentation, the controls and the issuance of administrative acts concerning fire protection via the ‘e-adeies’ information system, following an application by an authorised engineer. The said decision therefore ensures that the functionality of the fire service system becomes directly embedded in the e-adeies system. The decision entered into force on the date of entry into force of the information system which was 20 December 2021 (evidence 15).

#### *Integration of e-adeies with EFKA*

Greece has provided the Confirmatory Act by the President of the Technical Chamber of Greece (evidence 16) which on page 2 confirms that the interoperability between the ‘e-adeies’ information system with the ‘e-EFKA’ integrated information system, as of 6 May 2025.

#### *Integration of e-adeies with HEDNO (Hellenic Electricity Distribution Network Operator).*

Greece has provided the Confirmatory Act by the President of the Technical Chamber of Greece (evidence 17), which on page 1 confirms the commencement of issuing certifications of connection to the electricity transmission network via the ‘e-adeies’ system, as of 20 July 2022.

This is further confirmed in the Joint Ministerial Decision 4743/2021 (evidence 18) between the Minister of Environment and Energy and Minister of State regarding the issuance and verification of the certificate of connection to the electricity distribution network. This Decision provides the details for the procedure for the electronic submission and issuing of the certificate of connection to the electricity transmission networks which is to be carried out through the e-adeies information system. The Ministerial Decision entered into force upon publication, which was 31 December 2021. Therefore, the functionalities of issuing approvals are directly embedded in the e-adeies system.

#### *Integration of e-adeies with Natural Gas Services*

Greece has provided the Confirmatory Act 45334/2024 by the President of the Technical Chamber of Greece (evidence 19) which confirms the integration of the functionalities for the gas distribution companies in e-adeies system from 13 September 2024."

This is further proven by Ministerial Decision 5980/2024 by the Minister and Deputy Minister of Environment and Energy (evidence 20) which provides for the submission of applications, controls, and issuance of approvals through the e-adeies information system. The Decision entered into force on the date of its publication, which was 29 October 2024. Therefore, the functionalities of issuing approvals related to Natural Gas Services are directly embedded in the e-adeies system.

#### *Integration of e-adeies with Forestry Services*

Greece has provided Confirmatory Act 24576/2025 (evidence 21) by President of the Technical Chamber of Greece which confirms on page 1 that the issuance of forest service certificates is to take place through the 'e-adeies' system, as of 2 June 2025."

The Commission services conducted an on-the-spot check on 15 July 2025 to verify that the e-adeies system for construction permits is interoperable with other public systems, or that some functionalities of other public service systems have been directly embedded in the e-adeies system, which ensures a seamless flow of information between the concerned public services and the execution of the relevant approval processes electronically. This check was completed successfully, confirming that interoperability and data exchange between the e-adeies system and the systems of the Fire Department, EFKA (social security services), HEDNO (Hellenic Electricity Distribution Network) Operator, Natural Gas and Forestry Services is established.

### **- Implement outreach campaigns with private sector stakeholders**

Greece has provided the call for expression of interest (evidence 23) for the project "Campaigns to approach stakeholders in the private sector (engineers and construction companies)" concerning the processes for issuing construction permits. The call outlines the requirements and the elements of the outreach campaign that the contractor needs to deliver to public sector stakeholders (page 50), i.e. 1. Digital Media Plan for the Internet, 2. Management of social media accounts, 3. Social media outreach. Greece has also provided the deliverable submitted by the contractor (evidence 24), which describes the actions delivered under each of the said elements of the campaign and the results up to the time of submission of the deliverable (e.g. number of video views).

Finally, Greece has provided the Acceptance Protocol (evidence 25), page 6, acknowledging final acceptance of the abovementioned deliverable by the contractor, which confirms the completion of implementation of the outreach campaign to private sector stakeholders.

### **- Equipping and training of staff**

Greece has provided the contract (evidence 27) for the "Supply of electronic equipment within the framework of the implementation of the project 'Equipment for Building Services users'" (evidence 16). The contract lists the contractual obligations, along with the equipment to be delivered to staff involved

in the issuance of construction permits through the e-adeies system i.e. work stations (computers and computer screens) and display screens (page 2 of the contract).

Greece has also provided the Final Acceptance Protocol (evidence 29), which on page 1 acknowledges the receipt of "the contract for the supply of electronic equipment in the framework for the implementation of Subproject 3 entitled 'Subproject 15 A: YDOM User Equipment' of project 16591- Last version of building permits", demonstrating that the contractor has delivered the abovementioned equipment. Finally, Greece provided the the Decision of the Governing Committee of the Technical Chamber of Greece (evidence 28), which sets out the allocation of this equipment to users of the e-adeies system (page 2 onwards), demonstrating how this equipment has been distributed to the Building Services across the country, in order to ensure sufficient IT capacity for users to execute the necessary functions through the e-adeies system.

#### **- Guidelines made available online**

Greece has provided the webpage where the guidelines have been published online (evidence 39). The Commission Services have accessed the link provided by the authorities on 28 July 2025 and verified the that the guidelines are available online.

As supplementary evidence, Greece has provided the contract (evidence 33) which describes the obligations of the contractor that was chosen to deliver the online guidelines for the issuance of construction permits, and their specifications (Annex 1 of the contract). Greece also provided the relevant deliverables Π3 and Π4 by the contractor (evidence 36) which describe the actions delivered for the preparation of the said guidelines, and the creation of a relevant webpage on which they would be uploaded and made available to the general public. Greece has further provided the Acceptance Protocol (evidence 38) which acknowledges the receipt of deliverables for the abovementioned deliverables Π3 and Π4, demonstrating that the contractor delivered the relevant guidelines and dedicated webpage.

#### **- Fee schedule available online**

Greece has provided the webpage for the fee schedule which is available online (evidence 39). The Commission Services have accessed the link on 28 July 2025 and verified the that the fee scheduled is available online.

As supplementary evidence, Greece has also provided the contract for the project (evidence 41) for the "Creation of an Online Application for the Cost of Issuing a Building Permit". The contract details the contractual obligations and the specifications for developing a relevant internet service for making available to the public the cost of issuing a construction permit. Greece also provided the Deliverable Π3 submitted by the contractor (evidence 43), which describes the actions undertaken for the development of an internet application, open to the public, to calculate the cost of issuing building permits and the way in which this platform has been designed (page 4 of the contract). Greece has also provided the Acceptance Protocol for the said deliverable (evidence 45), which confirms that the contractors has completed the project "Creation of an Online Application for the Cost of Issuing a Building Permit", making available online the fees to be paid for issuing a construction permit.

#### **- Instate digital inspection functions for the Fire Department**

Greece has adopted the following legislation to establish the various inspection functions of the Fire Department to be conducted digitally:

- Decision 66913 (evidence 46) by the Chief of the Fire Department, to establish a digitalised Reports/Complaints Management System. In line with this Decision, complains can be submitted, amongst others, electronically, whilst the Fire Department is obliged to capture and process the content of the complaint digitally (e.g. even in the case of written or oral complains). Entry into force upon its publication on 31 December 2023.
- Decision 53905 (evidence 48) by the Chief of the Fire Department, to establish an inspection checklist to be used by fire department inspectors when conducting inspections. According to article 2.4, the data on the inspection checklist is to be captured digitally. Entry into force on 1 January 2025.
- Decision 65917 (evidence 49) by the Chief of the Fire Department, to establish a Compliance Action Model in cases of violations resulting from inspections of economic operators and installations. According to the Decision (article 3), the corrective actions imposed to economic operators are captured in the internal digital applications of the Fire Service Department. Entry into force on 1 January 2025.
- Decision 10236 (evidence 50) by the Deputy Ministers of Development, to establish the administrative measures and sanctions to be imposed on economic entities and installations for violations of fire protection regulations. According to the Decision (article 6, paragraph 3) an electronic file is maintained by the Fire Service regarding the compliance history of each economic operator. Entry into force upon its publication on 7 April 2025.
- Decision 17863 (evidence 51) by the Director of the Legal Service of the Fire Department, to inform the economic entities and facilities about the new regulations concerning supervision actions and the mediation between supervising authorities and businesses. Entry into force upon its publication on 8 April 2025. The guide is also published on the website of the Fire Department.

Greece has also provided a detailed list of new equipment that allows digital functions of inspections, as outlined in legislation above, and enables electronic access to the fire safety records through the use of digital applications. The equipment is listed in the Acceptance Protocol (evidence 54) page 2. This Acceptance Protocol and items listed therein is in line with the contract provided and the items listed therein on page 4 (evidence 53).

### **3. Getting Electricity**

#### **- Simplify/reduce the requirements for application to HEDNO (Hellenic Electricity Distribution Network Operator) and unify the system for declaring square meters to Municipalities**

Greece upgraded the Property Fees & Information of Municipalities system in order to reduce the requirements for application to HEDNO. Greece also provided the link to the system. The Commission services conducted an on-the-spot check on 15 July 2025 to verify that the simplified requirements for application to HEDNO are established, and the unified system for declaring square meters to municipalities is operational. This check was completed successfully, confirming that the system, which now integrates all services and exchanges between HEDNO and municipalities i.e. unifying previously fragmented services, is operational and used by accredited users. Further, it was also confirmed that the requirements for registering property data by an interested individual to HEDNO to obtain a grid connection have been reduced, as certifications issued by the municipality are now transferred online to HEDNO through this system, instead of having to be re-submitted in paper format by the interested individual.

Greece has also provided the user manual for the application of property fees and information of municipalities (evidence 56), and the certification of completion, provided by HEDNO (evidence 55), which confirms that the upgrade of the application of real estate information fees for municipalities was completed in September 2024 (page 1).

#### **4. Registering property**

##### **- Create e-platform enabling purchasers to complete all requirements for transferring property online**

Greece has provided the link to the e-platform that enables purchasers to complete all requirements for transferring property online (evidence 57). The Commission services conducted an on-the-spot check on 15 July 2025 to verify that e-platform is established and operational. This check was completed successfully, confirming that the e-platform allows the completion of all requirements for transferring property online.

Greece has also provided the Joint Ministerial Decision (evidence 59) regarding the operation of the "Electronic Property File" platform and the execution of real estate transactions. Article 1 describes that the subject matter of the Decision is 'how the electronic platform 'Electronic Property File 'referred to in Article 29 of Law 4821/2021 is to operate, with a view to supporting notaries and parties to the conclusion of contracts for the establishment, transfer, alteration or abolition of a right in rem in immovable property'. Article 2 describes how the electronic platform is accessed, and Article 3 describes how users can create a transfer request. This is in line with the pilot operation as described in the Joint Ministerial Decision (evidence 58) regarding the Pilot Operation of the "Electronic Real Estate File" platform. Greece has also provided the Acceptance Decision for 'Electronic Estate Transfer File'.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 335 Personal doctor reform - entry into force of legislation

**Related Measure:** 3,3.16984 Personal doctor reform

**Qualitative Indicator:** Entry into force of legislation setting out the key elements of the enrolment of rural doctors to the personal doctor system, opening similar positions in urban, suburban and rural areas and on the incentive mechanism

**Time:** Q1 2024

#### 1. Context:

The reform aims at increasing the number of personal doctors enrolled in the personal doctor system in order to achieve full population coverage and complete the population registration. The reform shall enable to enlarge the pool of available personal doctors by signing up all current rural doctors as personal doctors and by the creation of new similar positions in all urban, suburban and rural areas where there is still a gap of personal doctors. An incentive mechanism shall be introduced for doctors to become residents in General/Family Medicine or Internal Medicine. The gatekeeping-based system shall be activated.

Milestone 335 requires the enter into force of legislation setting out the key elements of the enrolment of rural doctors to the personal doctor system, the creation of new similar positions in urban, suburban and rural areas, where there is still a lack of personal doctors, and of the incentive mechanism to become residents in General/Family Medicine or Internal Medicine.

Milestone 335 is the first milestone of the reform. It will be followed by milestone 336, related to the registration with a personal doctor for all eligible citizens. The implementation of the reform shall be completed by 30 June 2025.

#### 2. Evidence provided:

|   | Name of the evidence                                                                                                             | Short description                                                                                                                                                                                                                                                                                                                                                            |
|---|----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled   |                                                                                                                                                                                                                                                                                                                                                                              |
| 2 | Law 5157/2024, published in the Official Journal A, No. 187/15.12.2024.<br><br>Entry into force: 15 November 2024                | Primary legislation on "Reform of the institution of the Personal Doctor – Establishment of University Health Centres – Disability Pension due to common disease and other provisions"                                                                                                                                                                                       |
| 3 | Ministerial Decision 65342/2024, published in Official Journal B, No. 6984/19.12.2024.<br><br>Entry into force: 19 December 2024 | Secondary legislation on "Method, procedure and determination of criteria for covering vacant and vacated positions of obligated and non-obligated Personal Doctors of Article 8 of Law 5157/2024 "Reform of the institution of the Personal Doctor - Establishment of University Health Centres - Disability pension due to common disease and other provisions" (A' 187)." |
|   | Ministerial Decision 66214/2024, published in Official Journal B, No. 7104/24.12.2024                                            | Secondary legislation on "Determination of the content, time and method of providing medical personnel services by specialized doctors, as well as the conditions, amount, time and                                                                                                                                                                                          |

|  |                                    |                                                                                                                                                                                                                                                                       |
|--|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | Entry into force: 24 December 2024 | procedure for payment of the financial incentive of paragraph 2 of Article 10 of Law 5157/2024 "Reform of the institution of Personal Doctor - Establishment of University Health Centres - Disability pension due to common disease and other provisions" (A' 187)." |
|--|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Entry into force of legislation setting out the key elements of the enrolment of rural doctors to the personal doctor system.** Furthermore, in line with the description of the measure, **the reform shall enable to enlarge the pool of available personal doctors by signing up all current rural doctors as personal doctors.**

The Law 5157/2024 on “Reform of the institution of the Personal Doctor – Establishment of University Health Centres – Pension of Disability from a common disease and other provisions” (Official Journal A 187/15.11.2024) (evidence no. 2) was published on 15 November 2024 and according to Article 51 of this Law, it entered into force on the day of its publication.

Article 8, specifically paragraph 1, sets out the provisions for the enrolment of the existing rural doctors of the primary healthcare system to the personal doctor system.

**the creation of new similar positions in urban, suburban and rural areas, where there is still a lack of personal doctors,** Article 8, specifically paragraph 2 sets out the provisions for the creation and filling of personal doctor positions in public primary health care facilities throughout the country (and therefore in all types of settings, including urban, suburban, and rural areas where there may be a lack of personal doctors).

Article 8, specifically paragraph 8, also provides for the exemption of the restrictions related to the annual recruitment schedule. This way such positions can be immediately established addressing emerging needs for personal doctors throughout the territory.

Article 9, specifically paragraph 4, sets out the provisions for the process of filling the personal doctor positions. Amongst other details, it outlines that the process is to be carried out by the Regional Health Administrations (DYPe) and that **vacancies are to be published in a notice issued by the Director of the relevant DYPe and approved by the Minister for Health.**

The process for filling out the positions is further confirmed in secondary legislation through the Article 2 of Ministerial Decision 66214/2024, published in Official Journal B, No. 7104 on 19 December 2024 (evidence 3), and as per Article 12 thereof, entered into force on that date.

**and of the incentive mechanism for doctors to become residents in General/Family Medicine or Internal Medicine.** Furthermore, in line with the description of the measure, **an incentive mechanism shall be introduced for doctors to become residents in General/Family Medicine or Internal Medicine.**

Article 10, specifically paragraph 2, sets out the provisions for the incentive mechanism for doctors to become residents in General/Family Medicine or Internal Medicine. First, it includes provisions for a financial incentive of up to € 40,000 for doctors who apply in 2025 and complete training in the specialties of General/Family Medicine or Internal Medicine. Two thirds (2/3) of the bonus will be paid at the start of the training, and one third (1/3) on receipt of the title of specific specialisations.

This incentive is further confirmed in secondary legislation through Articles 4 and 5 of the Ministerial Decision 66214/2024, published in Official Journal B, No. 7104 on 24 December 2024 and as per Article 7 thereof, entered into force on the date of its publication (evidence 4).

Secondly, Article 10, specifically paragraph 4, also includes provisions for the lifting of any payment withholding measures for doctors who transition to training a specialty programme in General/Family Medicine or Internal Medicine. Therefore, doctors who change specialty and choose the specialties General/Family Medicine and Internal Medicine, will continue to be remunerated.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 339 Strengthen the operational autonomy of the Independent Authority for Public Revenue (IAPR)

**Related Measure:** 4.1.16985 Modifications to Greece's tax policy framework

**Qualitative Indicator:** Revised legal framework to clarify competencies of IAPR and the Ministry of Digital Governance.

IAPR decision defining new key performance indicators for IAPR.

Signature of the Service Level Agreement, including the obligation for an annual implementation report, beginning the following year.

**Time:** Q2 2024

### 1. Context:

The reform aims to combat tax evasion and improve incentives, through promoting electronic payments and improving the structure of taxes on self-employed, as well as to enhance the operational autonomy of the tax administration. In particular this reform shall: (i) reform the taxation of the self-employed and stamp duty; (ii) combat tax evasion through widening the mandatory acceptance of electronic payments; (iii) establish new reporting requirements on data transmitted to the tax administration and enable the use of this data for VAT and Income Tax purposes; and (iv) strengthen the operational autonomy, resilience and level of customer services of the Independent Authority for Public Revenue (IAPR).

Milestone 339 requires the entry into force of the enabling legislation and signing of a comprehensive service-level agreement that confirms the responsibilities and resource allocation between IAPR and the Ministry of Digital Governance concerning computing and storage software licenses, web services, and database management. The reform should also include IAPR's decision defining new key performance indicators, including on audit effectiveness for IAPR; and introducing annual customers' satisfaction survey(s).

Milestone 339 is the third milestone of the reform, and it follows the completion of milestone 338. It will be followed by milestone 340, related to the new myDATA reporting requirements allowing for the use of myDATA for income tax purposes. The reform has a final expected date for implementation in Q2/2024.

### 2. Evidence provided:

|   | Name of the evidence.                                                                                                                                                                                                                     | Short description                                                                                                                                                                                                                                                                                                                                         |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                            |                                                                                                                                                                                                                                                                                                                                                           |
| 2 | Law No. 5222 of 28 July 2025, published in the Official Journal A' No. 134 of 28 July 2025, titled "National Customs Code and other provisions – Pension provisions",<br><br><i>Article 272 – Operational autonomy of the Independent</i> | Article 272 of Law 5222 (Official Journal A' 134) redefines the relationship and obligations between the IAPR and the Ministry of Digital Governance, expanding IAPR's operational authority to design procure and operate digital infrastructure to support its information systems and enabling the signing of a comprehensive service-level agreement. |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                        |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <p><i>Authority for Public Revenue (hereinafter referred to as "IAPR") regarding the procurement of central IT equipment, system software, and cloud computing services, in accordance with the procedures described in the applicable Service Level Agreement (hereinafter referred to as "SLA"),</i></p> <p>amends Articles 2, 37, and 41 of Law No. 4389/2016, published in the Official Journal A' No. 94 of 27 May 2016</p> |                                                                                                                                                                                                        |
| 3 | <p>Service Level Agreement (SLA), signed on 28/07/2025, between the General Secretariat for Information Systems of Digital Governance of the Ministry of Digital Governance, the IAPR, and the Ministry of National Economy and Finance, for the provision of hosting services on the G-Cloud, interoperability services, and other services.</p>                                                                                | <p>Service Level Agreement between IAPR and the Ministry of Digital Governance to define the services to be provided, the expected level of performance, and the responsibilities of both parties.</p> |
| 4 | <p>Decision of the Governor of IAPR, No. A 1084136/2024, published in the Official Journal, Section B, No. 4646/08.08.2024, titled "Definition of new key performance indicators of AADE and establishment of an annual satisfaction survey of IAPR's customers."</p>                                                                                                                                                            | <p>Governor's Decision introducing new KPIs and annual customers' satisfaction survey</p>                                                                                                              |

### 3. Analysis:

The justification and substantiating evidence provided by the Greece authorities cover all constitutive elements of the milestone.

**Entry into force of the enabling legislation and signing of a comprehensive service-level agreement that confirm the responsibilities and resource allocation between IAPR and the Ministry of Digital Governance concerning computing and storage software licenses, web services, and database management. The service-level agreement shall include a provision for both Authorities to cooperatively produce an annual implementation report, beginning the following year.** Furthermore, in accordance with the description of the measure, **the reform shall strengthen the operational autonomy, resilience and level of customer services of the Independent Authority for Public Revenue (IAPR).**

Article 272 of Law 5222 (Official Journal A' 134/28-07-2025) amends the provisions of Law 4389/2016, in particular articles 2, 37, and 41, to reinforce and clarify the institutional framework governing the relationship, obligations and coordination mechanisms between the Independent Authority for Public Revenue (hereinafter referred to as "IAPR") and the Ministry of Digital Governance. The amendment to Articles 2 and 37 of Law 4389/2016 establishes the legal framework granting the IAPR the authority to procure, operate, and manage its own digital infrastructures, system software, and databases used by its information systems. In particular, in accordance with Article 37 regarding data and systems management, "the procurement of central IT equipment, system software required for its use, and cloud computing services may be carried out by the competent service of the Authority". Concurrently, the General Secretariat for Information Systems and Digital Governance of the Ministry of Digital Governance have the responsibility for installing, maintaining, and configuring computing infrastructures and the software licenses, in accordance with the obligations set out in Article 37. Law 5222/2025 entered into force upon its publication in the Official Government Gazette, as per article 275 of the Law.

To operationalise this division of responsibilities and resource allocation, a comprehensive Service Level Agreement (SLA) was signed on 28/07/2025 between the General Secretariat for Information Systems of Digital Governance of the Ministry of Digital Governance, the IAPR, and the Ministry of National Economy and Finance, to establish the rights and obligations of the involved parties. In particular, as described in the preamble, the SLA aims to confirm the responsibilities and the allocation of resources between the IAPR and the Ministry of Digital Governance regarding the hosting of information systems and applications, equipment and software licenses, web services and database management. Article 1 (p.7) of the SLA sets out the scope of the services, while Article 2 (p.8) details the mutual obligations regarding infrastructure, system software, database management and licenses. Additionally, article 9 of the SLA outlines the coordination and monitoring mechanisms, including the requirement that the contracting parties jointly produce an annual implementation report regarding the implementation of this Agreement, within the first quarter of the following year, starting with the 2026 annual report. Finally, the relevant technical systems and services are listed in Annexes 1-5 of the SLA.

**IAPR decision defining new key performance indicators, including on audit effectiveness, for IAPR; and (ii) introduce annual customers' satisfaction survey(s).**

As regards the decision defining new key performance indicators (KPIs) including on audit effectiveness, the Greek authorities issued Governor's decision 1084136/2024, signed by the Governor by the IAPR and published in Official Gazette B' 4646/08.08.2024 and entered into force on the day of its publication. The decision introduces twenty-one KPIs, of which eleven are specifically targeted at audit effectiveness (pages 2-3) - namely, among others, indicators on the VAT gap, audit collections versus cost, frequency of appeals against audit decisions, and audit findings ratios in both tax and customs controls. Provision 6 of the abovementioned decision formally introduces among IAPR's core performance indicators the annual improvement of taxpayer's satisfaction levels, establishing the conduct of an annual satisfaction survey as an official tool for monitoring this indicator.

**4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 340 Combat tax evasion through using myDATA for income tax purposes

**Related Measure:** 4.1.16985 Modifications to Greece's tax policy framework

**Qualitative Indicator:** Revised legal framework adopted to set new myDATA reporting requirements, and allowing use of myDATA for income tax purposes.

**Time:** Q2 2024

### 1. Context:

The objective of the reform is to address tax evasion and improve incentives by promoting electronic payments and restructuring taxes for the self-employed, while also enhancing the operational autonomy of the tax administration. To that end, the reform shall: (i) revise the taxation system for the self-employed and update stamp duty regulations; (ii) combat tax evasion by expanding the mandatory use of electronic payments; (iii) introduce new reporting requirements for data shared with the tax administration, allowing its use for VAT and Income Tax purposes; and (iv) strengthen the operational autonomy, resilience, and customer service capabilities of the Independent Authority for Public Revenue (IAPR).

Milestone 340 requires the entry into force of primary and secondary legislation allowing the use of myDATA reporting by businesses (including self-employed) for income tax return purposes.

Milestone 340 is the fourth and last milestone of the reform and it is accompanied by milestone 339 in this payment request which relates to strengthening the operational autonomy of the Independent Authority for Public Revenue (IAPR). It follows the completion of (a) milestone 337 which relates most notably to expanding the mandatory use of electronic payments and introducing new reporting requirements for data shared with the tax administration, allowing its use for VAT returns and (b) milestone 338 which relates to the restructuring of self-employed taxation and the replacement of the stamp duty with a digital tax.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                   | Short description                                                                                                                                                                                                                                                                                       |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Law No. 5104, published in the Official Journal, Section A, No. 58/19.04.2024, "Tax Procedure Code and other provisions."                                                                                                                                                                                                                                                                              | Primary legislation on the establishment of mandatory electronic transmission of information (Article 16) and on authorizing the adoption of the necessary secondary legislation (Articles 83 (15 &16) and 84 (4)), date of entry into force of its relevant provisions (Article 117 (1)) 19 April 2024 |
| 2 | Ministerial Decision of the Deputy Minister of Finance, No. 1045, published in the Official Journal, Section B, No. 1191/12.03.2025, "Start of implementation and operating procedure for the provisions of paragraph 2 of Article 16 of Law 5104/2024 (Government Gazette A' 58) regarding the completion and submission of the Statement of Financial Data from Business Activity (Form E3), and the | Secondary legislation establishing the procedure for submitting tax-related data by businesses, applicable from tax year 2024 onwards and rules ensuring consistency between income and expense data.                                                                                                   |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                      |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | determination of business results based on the data transmitted by the obligated entities of paragraph 1 of Article 16 of Law 5104/2024 (A' 58) to the digital platform myDATA."                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                      |
| 3 | Decision of the Governor of IAPR, No. 1021, published in the Official Journal, Section B, No. 519/12.02.2024, "Format and content of the Statement of Financial Data from Business Activity' – Form E3."                                                                                                                                                                                                                                             | Secondary legislation defining the structure and required fields of the "Statement of Financial Data from Business Activity", and how data should align with information transmitted to the myDATA digital platform.                                                 |
| 4 | Joint decision of Deputy Minister of Finance and the Governor of IAPR, No. 1138, published in the Official Journal, Section B, No. 2470/22.06.2020, "Determination of the scope of application, timing, and procedure for the electronic transmission of data to the Independent Authority for Public Revenue, as well as any other necessary matter for the implementation of the provisions of Article 15A of Law 4174/2013 (Tax Procedure Code)." | Secondary legislation introducing a comprehensive framework for the digital reporting obligations of businesses, specifying the technical and procedural requirements for the electronic transmission of tax and accounting data to IAPR through the myDATA platform |
| 5 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                      |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Entry into force of primary and secondary legislation enabling the use of myDATA reporting on businesses (incl. self-employed) for income tax returns.** Furthermore, in accordance with the description of the measure, **the reform shall establish new reporting requirements on data transmitted to the tax administration and enable the use of this data for Income Tax purposes.**

The provisions of Article 16 (1) of the newly codified Tax Administration Code (law 5104/2024, OJ A, 58/19.04.2024) (evidence 1) establishes the obligation for all entities keeping accounting books in accordance with Law 4308/2014 (Greek Accounting Standards) to submit a summary of issued tax documents to the myDATA platform. Furthermore, Article 16 (2) of the Tax Administration Code stipulates that the taxable value of transactions and income considered by the Tax Administration for determining Value Added Tax (VAT) and income tax for each entity must not be lower than the value reflected in the documents submitted electronically to the myDATA platform. Moreover, tax deductions and deductible expenses will not be recognized unless the supporting documents on which they are based have also been electronically submitted to the myDATA platform.

Article 83 (15) (16) of the Tax Administration Code enables the issuance of secondary legislation to define key elements of Article 16 implementation, including the timeline for mandatory electronic submission, scope, exceptions, obligations of entities, acceptable deviations concerning the value of taxable transactions and revenues considered by the Tax Administration as well as any other necessary details. Moreover, the provisions of Article 84 (4) of the Tax Administration Code specifies that decisions issued under laws 4174/2013 (OJ A, 170/26.07.2013) and 4987/2022 (OJ 4, 206/04.11.2022) shall remain in effect. It should be underlined that laws 4174/2013, 4987/2022 and 5104/2024 are all Tax Procedure Codes that entered into force consequently (Law 4987/2022 ratified the Law 4174/2013 relating to tax procedure in accordance with Article 76 (6) (7) of the Constitution, while Law 5104/2024 replaced law 4987/2022 as the Tax Procedure Code).

Based on the aforementioned legal framework, the secondary legislation for the implementation of Article 16 of the Tax Administration Code is the following:

- the Decision of the Deputy Minister of Finance (1045/2025, OJ B 1191/12.03.2025) (evidence 2) setting out the implementation details for paragraph 2 of Article 16 of Law 5104/2024 regarding the submission of the "Statement of Financial Data from Business Activity" (Form E3). It establishes how income and expenses declared in Form E3 must align with data transmitted by businesses to the digital platform myDATA.
- The decision of the Governor of Independent Authority of Public Revenues (IAPR) (1021/2025, OJ B 519/12.02.2025) (evidence 3) defining the official format and content of the "Statement of Financial Data from Business Activity" (Form E3) for the tax year 2024 onwards. The key novelty is that the IAPR will pre-fill parts of the form using data transmitted via the myDATA platform. These amounts may be modified by the taxpayer, but only within the limits set by Decision 1045/2025 under Article 16(2) and Article 83(16) of Law 5104/2024. The decision explicitly states that only data which has been electronically transmitted to IAPR will be accepted for income and deductible expenses.
- The joint decision of Deputy Minister of Finance and the Governor of IAPR (1138/2020, OJ B 2470/22.06.2020) (evidence 4) establishing the framework for the electronic transmission of business transaction data to the IAPR via the myDATA platform. It applies to all businesses, including self-employed professionals, and aims to support the automated pre-filling of income tax returns.

The reporting obligations also apply to self-employed based on the combined provisions of Article 2(1) of Ministerial Decision 1045/2025, Article 16(1) of Law 5104/2024, and Article 1 of Law 4308/2014 (Greek Accounting Standards) where self-employed are explicitly included under case (c) of paragraph 2.

#### **4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Target:** 342 Cadastral mapping - 95% completion

**Related Measure:** 4.2.16986 Completion of the national cadastre

**Quantitative Indicator:** % of total property rights uploaded for public display, as per the provisions of Law 2308/1995 as amended by article 6 of Law 4821/2021

**Baseline:** 85

**Target:** 95

**Time:** Q2 2024

### 1. Context:

The reform includes two work streams to complete the national cadastre with the objective to improve Greece's business environment through enhancing the efficiency of property transactions and strengthening legal certainty with respect to property rights. Specifically, the first work stream of the reform is to complete cadastral mapping across Greece, namely through the uploading for public display of the property rights that are under collection or being processed. The second work stream of the reform entails the full transition from the old system of registering property via the old structure of mortgage offices, to the new agency 'Hellenic Cadastre'.

Target 342 pertains to the first work stream under the reform and captures the progress achieved in relation to the cadastral mapping of property rights in Greece. Specifically, it requires that 95% of Greece's property rights have reached the stage of public display, through the uploading of these rights as per the provisions of Law 2308/1995, as amended by Law 4821/2021. The baseline is 85%.

Target 342 is the second step of the implementation of the reform, and it follows the completion of target 341, which required that 85% of Greece's property rights have reached the stage of public display. Target 342 is accompanied by milestone 343 in this payment request, which concerns the completion of the transition to the new organisational structure of the Hellenic Cadastre. Target 342 will be followed by target 344, which requires the completion of cadastral mapping in Greece, with all property rights across the country's territory having reached the stage of public display. The reform has a final expected date for implementation of 30 June 2025.

### 2. Evidence provided:

|   | Name of the evidence.                                                                                                                 | Short description                                                                                                                                                                                                                                                                                                                                                                                                     |
|---|---------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled        |                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2 | Table provided by the Hellenic Cadastre with the percentage of Greece's property rights that have reached the stage of public display | The table contains the total number of property rights in Greece and the status of the cadastral mapping for the whole country with references to the cadastral contracts. Specifically, it includes i) the property titles that have advanced beyond the stage of uploading for public display and are already finalized as part of the cadastre which has been concluded and is in operation, and ii) the number of |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                             |
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|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | property rights that have reached the stage of public display.                                                                                                                                                                                                                                                                                                                                              |
| 3 | <p>Decisions of the Board of Directors of the Hellenic Cadastre approving the uploading for public display of property rights in the respective areas adopted since the assessment of previous milestone (M341) under the 5<sup>th</sup> payment request:</p> <ol style="list-style-type: none"> <li>1. Decision number 318/15/21.11.2024 (contract KT5-23 – Western Attica/ islands of Attica), signed by the President of the Board on 26 November 2024</li> <li>2. Decision number 320/8/28.11.2024 (contract KT5-25 – Samos/Chios/Ikaria), signed by the President of the Board on 3 December 2024</li> <li>3. Decision number 332/10/30.01.2025 (contract KT5-14 - Evia), signed by the President of the Board on 30 January 2025</li> <li>4. Decision number 340/6/13.03.2025 (contract KTIMA_VLS – Lasithi (Vrouchas, Loumas, Schinias)), signed by the President of the Board on 14 March 2025</li> <li>5. Decision number 356/2/28.05.2025 (contract KTIMA_PROT – Palaio Faliro/ Kallithea), signed by the President of the Board on 28 May 2025</li> <li>6. Decision number 365/5/11.07.2025 (contract KT5-16 – Zakynthos/Kefallonia/ Ithaki), signed by the President of the Board on 11 July 2025</li> </ol> | The Decisions concern the ongoing cadastral contracts which cover property rights that have newly entered the phase of public display, and specify the date of uploading of property rights in each respective area.                                                                                                                                                                                        |
| 4 | Table provided by the Hellenic Cadastre with the cadastral contracts in progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The table contains the state of play on property rights collection. Specifically, for each respective cadastral contract it lists the date of uploading of property rights for public display (referenced by the respective Decision number of the Board of Directors), the ending date for the public display process, and the number of estimated property rights for each respective cadastral contract. |
| 5 | Link to uploads of property rights for public display <a href="https://maps.ktimatologio.gr/">https://maps.ktimatologio.gr/</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Interactive map per municipality providing information on the status of                                                                                                                                                                                                                                                                                                                                     |

|   |                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                                               | cadastral mapping for every property plot.                                                                                                                                                                                                                                                                                                                                                                                                         |
| 6 | Decision of the President of the Board of Directors of the Hellenic Cadastre (Official Journal B' 239/16.01.2024, amended by Official Journal B' 6448/25.11.2024) regarding the opening of the cadastral office in Dodecanese | The Decisions set the date for the opening and operation of the cadastral office in the Dodecanese on 1 January 2025 and for the closing of the mortgage office in the respective area. The Decisions also provide for the integration of this new cadastral office in the "new agency 'Hellenic Cadastre' and the integration of the property rights of the said cadastral office (1.15% of the total property rights) in the operating cadastre. |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target.

**95% of Greece's property rights reached the stage of public display, as per the provisions of Law 2308/1995 as amended by Article 6 of Law 4821/2021.** Furthermore, in line with the description of the measure, the reform concerns the **uploading for public display of the property rights that are under collection or processing.**

The Council Implementing Decision requires that 95% of Greece's property rights reached the stage of public display, starting from a baseline of 85%. 85% was required by previous milestone 341, which was assessed under the 5<sup>th</sup> payment request. Under the 5<sup>th</sup> payment request, Greece demonstrated that a total of 84.84% of Greece's property rights have been mapped out, corresponding to 33,195,081 property titles out of a total of 39,126,027 (i.e. either rights that have been uploaded and are under public display, or rights that have passed beyond the stage of public display and are already part of the operating cadastre).

In the current payment request, Greece completed the collection and processing of property rights covered under six additional cadastral contracts, and uploaded these rights for public display for the review of the affected property owners, in line with the provisions of Article 4 of Law 2308/1995, subsequently as amended by Article 6 of Law 4821/2021. The said property rights constitute an additional 5.79%, corresponding to 2,265,231 property rights out of a total of 39,126,027.

Furthermore, Greece also demonstrated that an additional 1.15% of property rights specifically located in the Dodecanese area, are also now part of the operating cadastre (corresponding to 449,427 property rights out of a total of 39,126,027). These rights have been transferred to the new entity 'Hellenic Cadastre' with the opening and operation of the Dodecanese cadastral office on 1 January 2025.

Therefore, taking in the above into account, this amounts to a total of 91.78% of property rights being mapped out, corresponding to 35,909,739 property titles out of a total of 39,126,027 (i.e. either uploaded and available for public display, or rights that are already beyond that stage and are part of the operating cadastre). Whilst this constitutes a minimal numerical deviation of 3.39% from the requirement of the Council Implementing Decision, the overall objective of this target is considered

met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

Specifically, the authorities provided the following to attest to the satisfactory completion of the target:

- Table with the aggregate status of the cadastral mapping for the whole country (evidence 2).
- Decisions of the Board of Directors of the Hellenic Cadastre (evidence 3) for the uploading for public display of the property rights as of November 2024 (i.e. after the submission of the evidence for the previously assessed milestone 341 under the 5<sup>th</sup> payment request) in the areas covered by the respective six contracts. These contracts are also listed in the table provided under evidence 4. The Decisions specify the date of uploading of the property rights in each of these, as follows:
  1. Western Attica/ islands of Attica (under contract KT5-23), with date of uploading on 16 December 2024
  2. Samos/Chios/Ikaria (under contract KT5-25), with date of uploading on 19 December 2024
  3. Evia (under contract KT5-14), with date of uploading on 10 February 2025
  4. Lasithi (Vrouchas, Loumas, Schinias) (under contract KTIMA\_VLS), with date of uploading on 27 March 2025
  5. Palaio Faliro/ Kallithea (under contract KTIMA\_PROT), with date of uploading on 11 June 2025
  6. Zakynthos/Kefallonia/ Ithaki (under contract KT5-16), with date of uploading on 21 July 2025
- Decision published in Official Journal with which the responsibility for the property rights belonging to the Dodecanese is transferred to the new agency 'Hellenic Cadastre' through the opening and operation of the Dodecanese cadastral office (evidence 6).
- Link to the online interactive map (evidence 5). This is the platform on which the relevant information concerning the mapped property rights is uploaded, and is publicly accessible to concerned citizens for their review. It displays the status of the cadastre, down to the level of each property plot. It demonstrates the state of play, as described in the evidence 2-4 provided, and in particular, confirms the uploading of property rights for public display, for the areas mentioned under evidence. The Commission services accessed the link provided by the authorities on 24 July 2025 to verify that the property rights corresponding to the respective areas are under public display. This check was completed successfully, confirming that the said property rights are under public display, as per the provisions of Law 2308/1995, as amended by Article 6 of Law 4821/2021.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 343 Transition to the new organisational structure of the Hellenic cadastre – Full completion

**Related Measure:** 4.2.16986 Completion of the national cadastre

**Qualitative Indicator:** Official decisions of the Board of Directors of the Hellenic Cadastre for the opening and operationalisation of the cadastral offices and branches across the entire Greek territory, and closing of the old mortgage offices.

**Time:** Q2 2024

### 1. Context:

The reform includes two work streams to complete the national cadastre with the objective to improve Greece's business environment through enhancing the efficiency of property transactions and strengthening legal certainty with respect to property rights. Specifically, the first work stream of the reform is to complete cadastral mapping across Greece, namely through the uploading for public display of the property rights that are under collection or being processed. The second work stream of the reform entails the full transition from the old system of registering property via the old structure of mortgage offices, to the new agency 'Hellenic Cadastre'.

Milestone 343 concerns the second work stream of the reform and requires the adoption of the official decisions of the Board of Directors of the Hellenic Cadastre, so that the transition to the new organisational structure of the Hellenic Cadastre is completed. Specifically, i) the remaining cadastral offices for the regions of Thessaloniki, Crete and the Dodecanese are open and operational; ii) the remaining 18 branches are open and operational; and iii) the remaining 223 old mortgage offices are closed.

Milestone 343 is the third milestone of the reform, dealing with the transition from the old system of registering property to the new agency 'Hellenic Cadastre', and it follows the completion of target 341, which required that 85% of Greece's property rights have reached the stage of public display. Milestone 343 is accompanied by target 342 in this payment request, which requires that 95% of Greece's property rights have reached the stage of public display. Milestone 343 will be followed by target 344, which requires the completion of cadastral mapping in Greece, with all property rights across the country's territory having reached the stage of public display. The reform has a final expected date for implementation of 30 June 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                             | Short description                                                                                                                                                                                      |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                   |                                                                                                                                                                                                        |
| 2 | Decision of the President of the Board of Directors of the Hellenic Cadastre (Official Journal B' 1253/21.02.2024) regarding the opening of the cadastral office in Thessaloniki | The published Decision sets the date for the opening and operation of the cadastral office in Thessaloniki on 1 March 2024, and provides for the closing of the mortgage office in the respective area |
| 3 | Decision of the President of the Board of Directors of the Hellenic Cadastre (Official Journal B'                                                                                | The Decision sets the date for the opening and operation of the cadastral office in Crete on 1                                                                                                         |

|   |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                    |
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|   | 2644/02.05.2024) regarding the opening of the cadastral office in Crete                                                                                                        | July 2024, and provides for the closing of the mortgage office in the respective area                                                                                                                                                                                                                              |
| 4 | Decision of the President of the Board of Directors of the Hellenic Cadastre (Official Journal B' 6448/25.11.2024) regarding the opening of the cadastral office in Dodecanese | The Decision sets the date for the opening and operation of the cadastral office in the Dodecanese on 1 January 2025, and provides for the closing of the mortgage office in the respective area                                                                                                                   |
| 5 | Link to the website of the national cadastre and screenshots providing details on the cadastral offices of Thessaloniki, Crete and the Dodecanese                              | The information includes the address, contact telephone number, person responsible, and working hours applicable to the respective offices                                                                                                                                                                         |
| 6 | New organigram of the peripheral offices and branches                                                                                                                          | Analytical organogram of the new organisation structure of the Hellenic Cadastre across Greece, providing contact details, address and name of person responsible for each cadastral office and branch                                                                                                             |
| 7 | List of cadastral offices and branches of the Hellenic Cadastre and respective list of Decisions for their opening, published in the Official Journal                          | The table lists the publication numbers in the Official Journal of all the Decisions for the opening and operation of 17 cadastral offices and 75 branches, including the three cadastral offices and 18 branches opened after 1 November 2023, and their respective date of opening and operation                 |
| 8 | List of mortgage offices and list of the respective Decisions of the Board of Directors of the Hellenic Cadastre for their closure, published in the Official Journal          | The table lists the publication numbers in the Official Journal of all the Decisions for the closing of 388 mortgage offices, including the 223 closed after 31 October 2023, and their date of closure                                                                                                            |
| 9 | Link to the website of the national cadastre and screenshot of the webpage providing the links to all the published Decisions for the transition to the new structure          | The website provides the links for each of the published Decisions, concerning the closure of the 388 mortgage offices and the opening of the respective 17 cadastral offices and 75 branches under the new organizational structure, as required by the provisions of of Article 1, paragraph 7, of Law 4512/2018 |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Following the adoption of the official decisions of the Board of Directors of the Hellenic Cadastre, the transition to the new organisational structure of the Hellenic Cadastre is completed. Specifically, i) the remaining cadastral offices for the regions of Thessaloniki, Crete and the Dodecanese are open and operational. Furthermore, in line with the description of the measure, By 1 November 2023, 14 regional cadastral offices [...] were open and operational. Through the reform, all 17 regional cadastral offices [...] shall be opened and made operational, in line with Law 4512/2018.**

Greece demonstrated that the remaining three out of 17 cadastral offices needed to complete the organisational structure of the Hellenic Cadastre, as provided under Article 15 of Law 4512/2018, are open and operational. Namely, these concern the cadastral offices for the regions of Thessaloniki, Crete, and the Dodecanese, which were opened and made operational following the adoption of the respective Decisions of the Board of Directors of the Hellenic Cadastre, published in the Official Journal (evidence 2-4). In addition, Greece provided links to the national cadastre website and screenshots of information made publicly available regarding access to and location of each of the respective cadastral office (address, person responsible, working hours, etc.), attesting to the fact that they are operational (evidence 5). The Commission services accessed the link provided by the authorities on 21 July 2025 to verify that these details are available and accessible to the public. This check was completed successfully, confirming that the cadastral offices are open and operational. Greece also provided the organigram of the new agency, indicating among others, all 17 cadastral offices across Greece as provided under Article 5 of Law 4512/2018, including their details, namely person responsible, contact number and address for each (evidence 6).

**ii) the remaining 18 branches are open and operational.** Furthermore, in line with the description of the measure, **By 1 November 2023, [...] 57 branches were open and operational. Through the reform, all [...] 75 branches in Greece shall be opened and made operational, in line with Law 4512/2018.**

Greece demonstrated that the remaining 18 out of 75 cadastral branches needed to complete the organisational structure of the Hellenic Cadastre, as provided under article 15 of Law 4512/2018, were opened and made operational following the adoption of the respective Decisions of the Board of Directors of the Hellenic Cadastre, published in the Official Journal. Greece provided the publication number in the Official Journal for each of the Decisions for the opening and operation of cadastral branches and their date of opening, including the 18 opened after 1 November 2023 (evidence 7), and the link and screenshot to the relevant webpage of the Hellenic Cadastre (evidence 9) which provides the links to each of these published Decisions. The Commission services accessed the link provided by the authorities on 21 July 2025 to verify that the Decisions concerning the opening of the cadastral branches under the new organizational structure are adopted and published. This check was completed successfully, confirming that the Decisions for the opening of these cadastral branches are published and uploaded online. The publication of the said Decisions on the official site of the Hellenic Cadastre was done in accordance with the provisions of Article 1, paragraph 7, of Law 4512/2018. Greece also provided the organigram of the new agency, indicating among others, all 75 cadastral branches across Greece as provided under Article 15 of Law 4512/2018, including their details, namely person responsible, contact number and address for each (evidence 6).

**iii) the remaining 223 old mortgage offices are closed.** Furthermore, in line with the description of the measure, **the reform shall lead to the full transition from the old system of registering property via the old structure of mortgage offices, to the new agency 'Hellenic Cadastre'. By 31 October 2023, 165 old mortgage offices were closed. Through the reform, [...] all 388 old mortgage offices shall be closed.**

Greece demonstrated that the remaining 223 out of 388 old mortgage offices have been closed, following the adoption of the respective Decisions of the Board of Directors of the Hellenic Cadastre, published in the Official Journal, hence abolishing the old system of registering property via the old structure of mortgage offices. Greece provided the publication number in the Official Journal each respective Decision and their date of closing, including for the 223 closed after 31 October 2023 (evidence 8). Greece also provided the link and screenshot to the relevant webpage of the Hellenic Cadastre (evidence 9) which provides the links to each of the published Decisions for the closing of the 388 old mortgage offices. The Commission services accessed the link provided by the authorities on 21 July 2025 to verify that the Decisions concerning the closing of the mortgage offices are adopted

and published. This check was completed successfully, confirming that the Decisions for the the closing of these mortgage offices are published and uploaded online. The publication of the said Decisions on the official site of the Hellenic Cadastre was done in accordance with the provisions of Article 1, paragraph 7, of Law 4512/2018.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 351 Legislative framework for renewable hydrogen and sustainable biomethane

**Related Measure:** 16987 Licensing framework for renewable hydrogen and sustainable biomethane

**Qualitative Indicator:** Entry into force of the legislation

**Time:** Q2 2024

### 1. Context:

The objective of the reform is to put in place the required legislation for an effective deployment of renewable hydrogen and sustainable biomethane in Greece by removing potential barriers and establishing processes for the development of the renewable gases sector and markets. The reform shall foresee the adoption of a legislative framework aiming at promoting the production and consumption of renewable hydrogen and sustainable biomethane.

Milestone 351 requires the entry into force of the legislation (primary and secondary) for the support to renewable hydrogen and sustainable biomethane.

Milestone 351 is the only milestone of this reform, related to the entry into force of the legislation. The reform has a final expected date for implementation in Q2/2024.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                               | Short description                                                                                                                                                                                                                                                     |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                       |
| 2 | Law 5215/20255215/2025 of the Ministry of Environment and Energy on the “Framework for the promotion of biomethane production, rules on the organisation of the market in hydrogen production and geo-restricted hydrogen networks – partial incorporation of directive (eu) 2024/1788 and other provisions on environmental protection” (GG A’ 116/04.07.2025)<br>Entry into force on 4 July 2025 | Legislation for an effective deployment of renewable hydrogen and sustainable biomethane through establishing processes for the development of the markets                                                                                                            |
| 3 | Ministerial Decision YPEN/DAPEEK/86000/2136 «Regulation for the Installation and Operation of Biomethane Production Units» (GG B’ 4170/31.07.2025)<br>Entry into force on 31 July 2025                                                                                                                                                                                                             | The Regulation governs the Installation and Operation of Biomethane Production Plants, inter alia, the application form, supporting documents and other relevant information required for the issuance of Installation and Operation Permits.                         |
| 4 | Decision No E-183/2025 “Amendment of the Natural Gas System Management Code for the integration of provisions concerning Biomethane, in accordance with                                                                                                                                                                                                                                            | Decision of the National Regulatory Authority for Energy, Waste and Water, adopted upon the proposal by the National Natural Gas System (NNGS) Operator, regarding the Management Code of the network in order to determine specific procedural and technical matters |

|   |                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                            |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | paragraph 3 of Article 20 of Law 5215/2025" (GG B' 4125/29.07.2025)<br>Entry into force 29 July 2025                                                                                                                                                                                         | concerning the connection of the biomethane plants to the NNGS.                                                                                                                                                                                                                                                                                            |
| 5 | Decision No E-184/2025 Amendment of the Natural Gas Distribution Network Management Code for the integration of provisions concerning Biomethane, in accordance with paragraph 3 of Article 20 of Law 5215/2025 (GG B' 4135/30.07.2025)<br>Entry into force 30 July 2025                     | Decision of the National Regulatory Authority for Energy, Waste and Water, adopted upon the proposal by the Natural Gas Distribution Networks (NGDN) Operators regarding the Management Code of the network in order to determine specific procedural and technical matters concerning the connection of the biomethane plants to the NGDN.                |
| 6 | Decision No E-185/2025<br>Amendment of the Measurement Regulation of the Natural Gas Distribution Network for the integration of provisions concerning Biomethane, in accordance with paragraph 3 of Article 20 of Law 5215/2025 (GG B' 4137/30.07.2025)<br>Entry into force on 30 July 2025 | Decision of the National Regulatory Authority for Energy, Waste and Water, adopted upon the proposal from the NGDN Operator, regarding the Metering Code of the natural gas distribution network to determine specific technical matters concerning the standardization of the Measurement and Control Units installed within biomethane production units. |
| 7 | Decision No E-186/2025<br>Determination of the required information and documentation to be submitted by hydrogen producers for the fulfillment of the conditions for the recognition of the produced hydrogen as renewable (GG B' 4124/29.07.2025)<br>Entry into force on 29 July 2025      | Decision of the National Regulatory Authority for Energy, Waste and Water, regarding the content of the information required as well as the time and the manner of its submission by renewable hydrogen producers in compliance with Commission Delegated Regulation (EU) 2023/1184.                                                                       |

### 3. Analysis:

The justification and substantiating evidence provided by the Greece authorities cover all constitutive elements of the milestone.

#### **Entry into force of the legislation (primary and secondary) for the support to renewable hydrogen and sustainable biomethane.**

Law 5215/2025 of the Ministry of Environment and Energy on the *"Framework for the promotion of biomethane production, rules on the organisation of the market in hydrogen production and geo-restricted hydrogen networks – partial incorporation of directive (EU) 2024/1788 and other provisions on environmental protection"*, constitutes the primary legislation and entered into force on 4 July 2025, as stated in article 66 (evidence 2)

The secondary legislation comprises five decisions:

- Ministerial Decision on the issuance of the Regulation for the Installation and Operation of Biomethane Production Units, which entered into force on 31 July 2025, as provided in Article 22 (evidence 3).

- Decision of the National Regulatory Authority for Energy, Waste and Water concerning the Natural Gas system management code, which entered into force on the date of publication in the Governmental Gazette, 29 July 2025<sup>6</sup> (evidence 4).
- Decision of the National Regulatory Authority for Energy, Waste and Water regarding the management code of the network related to the connection of biomethane plants, which entered into force on the date of publication in the Governmental Gazette 30 July 2025 (evidence 5).  
Decision of the National Regulatory Authority for Energy, Waste and Water regarding the Metering Code of the natural gas distribution network, which entered into force on the date of publication in the Governmental Gazette, 30 July 2025 (evidence 6).  
Decision of the National Regulatory Authority for Energy, Waste and Water, regarding the content of the information required as well as the time and the manner of its submission by renewable hydrogen producers, which entered into force on the date of publication in the Governmental Gazette, 29 July 2025 (evidence 7).

**The legislation shall include: the promotion of production and consumption of renewable hydrogen and sustainable biomethane.** Furthermore, in line with the description of the measure, **the reform shall foresee the adoption of a legislative framework aiming at promoting the production and consumption of renewable hydrogen and sustainable biomethane.**

For the sake of clarity, the analysis will be broken down into sub-points to demonstrate a detailed and targeted assessment of the legislation to showcase that all elements of the milestone description are covered.

- *the promotion of production of renewable hydrogen*

Article 40(1) of Law 5215/2025 (evidence 2) provides for the promotion of production by providing the right of renewable hydrogen units holding a Producer Certificate to apply for support schemes in the form of investment or operational aid, subject to prior EU Commission approval. Regarding hydrogen production units that have already received EU Commission approval, allows them to also apply for individual aid.

Article 40 (2) provides for production units that have already received EU Commission approval to be able to apply for individual aid, further promoting the production of renewable hydrogen.

- *the promotion of consumption of renewable hydrogen*

Article 34(4) of Law 5215/2025 (evidence 2) promotes the consumption of renewable hydrogen by allowing the establishment and operation of hydrogen refuelling stations within the hydrogen production units, thus enabling the direct use of the hydrogen produced as road transport fuel.

Chapter F, articles 41-46 of Law 5215/2025 (evidence 2) further promotes the consumption of hydrogen by including specific rules for the development of hydrogen valleys as Geographically Confined Hydrogen Networks, which are expected to enable the development of synergies among the

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<sup>6</sup> According to Articles 18(1) and (2) of Greek Law No. 2690/1999 (Ratification of the Administrative Procedure Code and other regulations), a regulatory administrative act is considered complete (i.e., it enters into force) upon its publication in the Government Gazette, unless a special method of publication is provided for. The same logic applies to the other Decisions under this milestone.

hydrogen producers and off-takers involved, thus promoting the use of hydrogen for the decarbonization of a wide range of industries.

- *the promotion of production of sustainable biomethane*

Article 17 of Law 5215/2025 (evidence 2) promotes the production of sustainable biomethane by including a support scheme granted through investment or operational aid, and the general terms for granting such aid for biomethane units.

Article 18 of Law 5215/2025 (evidence 2) incentivises the promotion of biomethane production through exemptions from entry charges to the National Natural Gas Transmission System or the Distribution Network, encouraging upgrading biogas power units into biomethane units through operational support and use of released grid capacity for installing a photovoltaic system with net billing on-site or adjacent land.

- *the promotion of consumption of sustainable biomethane*

Article 16 of Law 5215/2025 (evidence 2) contributes to the promotion of consumption of sustainable biomethane by defining the conditions under which the produced biomethane can be made available in the market by Natural Gas Suppliers, particularly in the form of bio-CNG or bio-LNG as an alternative road and maritime transport fuel. It also defines the exceptional cases where the competent operator may refuse to accept the biomethane produced.

**including the specification of the licencing and permitting procedures, provisions on spatial planning, the definition of the technical specifications for transmission, storage and injection into the grid.** Furthermore, in line with the description of the measure, **this shall cover the specification of the licencing and permitting procedures, including provisions on spatial planning, the definition of the technical specifications for transmission, storage and injection into the grid.**

For the sake of clarity, the analysis will be broken down into sub-points to demonstrate a detailed and targeted assessment of the legislation to showcase that all elements of the milestone description are covered.

- *For biomethane:*

Article 6 of Law 5215/2025 (evidence 2) establishes the **specification of the licencing and permitting procedures** by stipulating the steps to be taken for obtaining (a) the Environmental Permit, (b) the Installation Licence, and (c) the Operation Licence.

Article 10 – 14 of Law 5215/2025 (evidence 2) sets the different **licences** needed to set up a biomethane unit.

Article 20(2) of Law 5215/2025 (evidence 2) establishes the issuance of the Biomethane Units Installation and Operation Licences Regulation. This was issued through the Ministerial Decision YPEN/DAPEEK/86000/2136 (evidence 3) which covers (a) the supporting documents and general information submitted by the interested parties for the issuance or modification or transfer of the Installation and Operation License of a biomethane unit (Part 1 and 3 of the Annex), as well as the procedure to be followed (Chapters B' (Articles 3 to 6) and C' (Articles 7 to 12)), (b) the application form for the issuance of Installation and Operation Licenses (part 1 of the Annex), (c) the general terms and other content elements of the Installation and Operation Licenses (Articles 6 and 12), (d) the conditions

and general procedure for the extension of the validity of the Installation and Operation Licenses (articles 4 and 9), as well as for their modification (Articles 5 and 11), revocation, or suspension of validity (Article 19), (e) the criteria for the assessment of fines and of administrative penalties (Article 15), and (f) any specific issue related to the installation and operation of biomethane units (Articles 13 to 17), including the specific terms reflected in their licenses and approvals (Articles 6 and 12).

Article 20(3) establishes the amendment of the Operation Codes of the National Natural Gas System (*hereafter referred to as “NNGS”*) and Natural Gas Distribution Networks (*hereafter referred to as “NGDN”*) operators, following a proposal by the operators. With regard to the NNGS, the NNGS Operation Code was amended by virtue of Decision E-183/2025 (evidence 4), while with regard to the NGDN, the NGDN Operation Code was amended by virtue of Decision E-184/2025 (evidence 5) and the Metering Code of the natural gas distribution network was amended by virtue of Decision E-185/2025 (evidence 6). Both the NNGS and the NGDN Operation Codes have been revised to overall **address the injection of biomethane from biomethane production units**. The Metering Code of the natural gas distribution network has been revised to include Annex II, which sets the Technical Measurement Requirements for the Measurement and Control Units.

Article 21(1) of Law 5215/2025 (evidence 2) covers the **spatial planning** for biomethane units, which are to be developed subject to the dedicated general, industrial and renewable energy sources spatial planning legislation already in force.

Article 21(4) of Law 5215/2025 (evidence 2) covers **the definition of the technical specifications for transmission** by establishing the analogous application to biomethane of the current legal framework applicable to natural gas, including the use of the natural gas transmission network.

Article 3(o) of Law 5215/2025 (evidence 2) covers the **storage** of biomethane by establishing that biomethane production unit includes all the necessary infrastructure for the receipt, processing and storage of raw materials, as well as the biomethane production infrastructure, including, among others, facilities intended for **biomethane storage**, compression or liquefaction, but excluding those facilities that are part of the Measurement and Control Unit.

Article 7 of Law 5215/2025 (evidence 2) establishes that a **unit injecting biomethane** into the grid is required to apply for connection terms to the competent natural gas transmission system or distribution network operator, as per the applicable operation code provisions.

- *For renewable hydrogen:*

Article 26 of Law 5215/2025 (evidence 2) regulates the **licencing and permitting procedures for hydrogen** by establishing the maximum duration of the licencing and approval procedures and the granting of connection terms by the competent Operators of the National Natural Gas System, the natural gas distribution network operators, the Independent Power Transmission Operator, or the Hellenic Electricity Distribution Network Operator.

Article 27 of Law 5215/2025 (evidence 2) establishes **Phase A of the licencing process**, which concerns the issuance of a Hydrogen Producer Certificate by the Energy Sector of the Regulatory Authority for Waste, Energy and Water.

Article 30 of Law 5215/2025 (evidence 2) establishes **Phase B of the licencing process** following the issuance of the Hydrogen Producer Certificate, according to which the applicant shall proceed with obtaining (a) the Environmental Permit, (b) an Installation Approval, and (c) an Operation Approval.

Article 48 of Law 5215/2025 (evidence 2) covers the **spatial planning** for hydrogen units, which are to be developed subject to the dedicated general, industrial and renewable energy sources spatial planning legislation already in force.

Article 25(k) of Law 5215/2025 (evidence 2) establishes **the definition of the technical specifications for transmission**. This article also allows the transmission of hydrogen through the existing natural gas infrastructure.

Article 25(q) of Law 5215/2025 (evidence 2) defines “hydrogen **storage facility**” as an installation used for the storage of high-purity hydrogen, including i) the part of the hydrogen terminal used for storage, excluding the part used for production operations and installations intended exclusively for the performance of the tasks of hydrogen network operators; and ii) large, in particular underground, hydrogen storage facilities, with the exception of smaller, easily reproducible hydrogen storage facilities.

Article 31 of Law 5215/2025 (evidence 2) covers the **definition of the technical specifications for injection into the grid** by establishing that for hydrogen units intending to inject into the grid, the applicant must apply for connection terms to the competent Operator, as per the applicable operation code provisions.

Article 33 of Law 5215/2025 (evidence 2) addresses specific issues regarding the **connection of hydrogen units to the grid** and the installation of metering devices, covering design, construction, cost allocation, and the obligation of the producers to provide access and space to the Operator.

#### **the clarification of the roles of the various stakeholders, as well as public authorities involved**

For the sake of clarity, the analysis will be broken down into sub-points to demonstrate a detailed and targeted assessment of the legislation to showcase that all elements of the milestone description are covered.

- *For Biomethane:*

The law clarifies the roles of the various stakeholders as follows. The **National Natural Gas Transmission System Operator (DESFA)** or the **Distribution Network Operator**, issue the connection terms (Article 7 of Law 5215/2025) and the Trial Operation Completion Certificate (Article 13 of Law 5215/2025).

The competence of the issuance, amendment and reissuance of the Installation Licence (Articles 10, 11 and 12 of Law 5215/2025) and the issuance and amendment of the Operation Licence (Articles 13 and 14 of Law 5215/2025) of production units, is allocated either a) to **the Renewable Energy Sources and Alternative Fuels Directorate of the Ministry of the Environment and Energy**, for units rated as A1 for the purposes of their environmental assessment, or b) to the **Technical Inspections Directorate of the local Devolved Administration**, for units rated as A2 and B for the purposes of their environmental assessment.

the **Operator of Renewable Energy Sources and Guarantees of Origin** is in charge of the issuance of Guarantees of Origin for sustainable biomethane (Article 19 of Law 5215/2025).

The **Renewable Energy Sources and Alternative Fuels Directorate of the Ministry of the Environment and Energy**, supported by the Centre for Renewable Energy Sources and Saving, oversees the compliance with the sustainability certification rules (Article 5 of Law 5215/2025).

- *For renewable hydrogen:*

The law clarified the roles of the various stakeholders as follows. **The Energy Sector of the Regulatory Authority for Waste, Energy and Water** is involved regarding the issuance, amendment and transfer of the Hydrogen Producer Certificates (Article 27, in conjunction with Article 49(1) of Law 5215/2025).

The **National Natural Gas Transmission System Operator or the Distribution Network Operator**, are responsible for the issuance of connection terms (Article 31 of Law 5215/2025), the issuance of the Trial Operation Completion Certificate (Article 34(3) of Law 5215/2025) and the Full Operation Certificate (Article 35(2) of Law 5215/2025).

**The Ministry of Development and Investments** is responsible regarding the Installation Approval and Operation Approval issuance (Article 34 of Law 5215/2025) and the **Regulatory Authority for Waste, Energy and Water**, regarding the issuance of Geographically Confined Hydrogen Network Licences (Article 41 of Law 5215/2025), and Operation Licences (Article 43 of Law 5215/2025).

The Operator of Renewable Energy Sources and Guarantees of Origin is charge of the issuance of Guarantees of Origin for renewable hydrogen is the (Article 39(2) of Law 5215/2025).

**The Renewable Energy Sources and Alternative Fuels Directorate of the Ministry of Environment and Energy**, supported by the Centre for Renewable Energy Sources and Saving, oversees the compliance with the sustainability certification rules (Article 39(3) of Law 5215/2025).

The **regulatory oversight framework of the Energy Sector** is established to ensure compliance with the law, particularly in ensuring access to natural gas and hydrogen networks (Article 36 of Law 5215/2025).

**while ensuring a mechanism to certify that the hydrogen produced would be renewable and the biomethane sustainable, in line with the recent provisions from the RED II Delegated Acts.**

Article 37 establishes the rules allowing hydrogen producers to use renewable electricity from the grid to account it as fully renewable, ensuring the produced gas qualifies as renewable hydrogen. To this regard, Secondary legislation Decision E-186/2025 (evidence 7) sets a) the information to be provided, b) the information submission timeline, c) the submission of the information provided as electronic files, and d) the responsibility of renewable hydrogen producers to collect, compose and process the evidence required, while the competent grid operators are obliged to provide all the required data within their authority, following relevant requests from hydrogen producers.

Article 38 requires renewable hydrogen producers to provide information to the Regulatory Authority for Waste, Energy and Water, the Guarantee of Origin Issuing Body, and the Guarantee of Origin Verification Body, to prove their compliance with Regulation (EU) 2023/1184 of 10 February 2023 supplementing Directive (EU) 2018/2001 of the European Parliament and of the Council by establishing a Union methodology setting out detailed rules for the production of renewable liquid and gaseous transport fuels of non-biological origin

Article 4 ensures via the definition of the origin of raw materials for biomethane production alignment with RED II and its delegated acts. The same provision sets the conditions for processing and disposal of the digested residue from biomethane units, and additionally provides for covering the thermal needs of biomethane production units by utilizing part of the produced biomethane.

Article 5 ensures the verification of compliance with sustainability and greenhouse gas emissions reduction criteria in line with RED II and its delegated acts.

Article 19 establishes the framework for biomethane origin certification via Guarantees of Origin, while regulating, at the same time, the issuance, management, and operation of these guarantees in line with RED II and its delegated acts.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 356 Entry into force of legislative framework

**Related Measure:** 5,1.16990 Grid and storage capacity - fostering of storage investments

**Qualitative Indicator:** Primary and secondary legislation

**Time:** Q2 2024

#### 1. Context:

The objective of this reform is to promote investments in energy storage solutions, both as standalone units and storage combined with renewable energy sources. The programme aims to set up the framework that will ultimately support at least 900 MW of standalone battery storage projects through the combination of the reform with investment aid.

Milestone 356 requires the entry into force of primary and secondary legislation setting out the enabling framework for the installation of storage units to existing or new RES power plants, which shall provide priority in licensing procedures and grid access to these plants.

Milestone 356 is the first step of the implementation of the reform. It will be followed by milestone 357, related to the entry into force of the support scheme.

The reform has a final expected date for implementation in Q2/2025.

#### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Short description                                                                                                                |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                  |
| 2 | Law 4951/2022 ' <i>Modernization of the licensing procedure of Renewable Energy Sources Phase B, Licensing of electricity production and storage, framework for the development of Pilot Offshore Photovoltaic Plants and specific provisions for energy and environmental protection</i> ' and entered into force on 4 July 2022 date of publication in the Official Journal (Government Gazette A' 129/04.07.2022) based on Article 173                                                                  | Article 89<br>Defines the priority framework for granting Final Connection Offers to RES and storage stations                    |
| 3 | Ministerial Decision YPEN/GDE/84014/7123 ' <i>Establishment of a priority framework for the granting of final Connection Offers for RES and CHP plants and storage facilities by the Network Operator and the System Operator, including areas designated as congested networks, by way of derogation from any other general or specific provision, in accordance with Article 89 of Law 4951/2022.</i> ' and entered into force on 12 August 2022 date of publication in the Official Journal (Government | Ministerial Decision (MD) establishes the priority framework for issuance of Final Connection Offers to RES and storage stations |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                           |
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|   | Gazette B' 4333/12.08.2022) based on Article 17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                           |
| 4 | Ministerial Decision YPEN/DAPEEK/7063/374 <i>'Amendment of decision no. YΠEN/ΓΔΕ/84014/7123/12.08.2022 of the Minister of Environment and Energy, entitled 'Establishment of a priority framework for the granting of final Connection Offers for RES and CHP plants and storage facilities by the Network Operator and the System Operator, including areas designated as congested networks, by way of derogation from any other general or specific provision, in accordance with Article 89 of Law 4951/2022' (Government Gazette B' 4333).'</i> and entered into force on 20 January 2023 date of publication in the Official Journal (Government Gazette B' 275/20.01.2023) based on Article 17                                     | Ministerial Decision (MD) amending the priority framework for issuance of Final Connection Offers to RES and storage stations             |
| 5 | Ministerial Decision YPEN/DAPEEK/88889/2592 <i>'Determination of the total installed capacity of RES plants under paragraph 8 of Article 30 of Law 5095/2024, the minimum acceptable duration of bilateral contracts under point (b) of sub-paragraph A of paragraph 8 of Article 30 of Law 5095/2024, the production ratio per RES plant technology, the curtailments to be applied in special cases, and the order of priority for examining requests for the granting of Final Connection Offers for RES projects, in accordance with paragraph 12 of Article 30 of Law 5095/2024.'</i> and entered into force on 27 August 2024 date of publication in the Official Journal (Government Gazette B 4918/27.08.2024) based on Article 9 | Ministerial Decision (MD) Installed capacity, curtailments, and priority rules for grid access for RES projects with bilateral agreements |
| 6 | Law 5151/2024 <i>'Settings for the modernization of waste management, the improvement of the energy saving framework, the development of energy projects, and addressing of urban planning issues'</i> and entered into force on 04 November 2024 date of publication in the Official Journal (Government Gazette A' 173/04.11.2024) based on Article 93                                                                                                                                                                                                                                                                                                                                                                                  | Article 40<br>Addition of storage units to existing and new Renewable Energy Stations                                                     |
| 7 | Law 5095/2024 <i>'Strengthening of legal practice: Provisions concerning certificates of</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Article 30                                                                                                                                |

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| <i>inheritance, the acceptance and renunciation of inheritances, the registration and cancellation of consensual mortgage prenotations, sworn affidavits, the Court Buildings Financing Fund, the payment of legal aid cases, and other urgent regulations.</i> ’ and entered into force on 15 March 2024 date of publication in the Official Journal (Government Gazette A' 40/15.03.2024) based on Article 32 | Installed capacity, curtailments, and priority rules for grid access for RES projects with bilateral agreements |
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### 3. Analysis:

The justification and substantiating evidence provided by the Greece authorities cover all constitutive elements of the milestone.

**Entry into force of the primary and secondary legal framework setting out the enabling framework for the installation of storage units to existing or new RES power plants, which shall provide priority in licensing procedures and grid access to these plants.**

The primary framework for the installation of storage in renewable energy plants was introduced through Law 4951/2022 (Government Gazette A' 129/04.07.2022) (evidence 2). The Law provides for the licensing procedure for renewable energy (hereinafter referred to as 'RES') projects and incorporates electricity storage into the legislative framework. Articles 4 to 30 codifies the licensing sequence for RES, combined heat and power (hereinafter referred to as 'CHP') and storage stations, comprising in provisions on the Producer's Certificate through environmental permitting, the issuance of the Final Connection Offer, the granting of the installation permit, and finally the license for operation. Article 4 sets out the sequential stages of licensing, starting with the Producer's Certificate, which replaces the older production license and is granted through a digital platform managed by the Regulatory Authority for Energy, Waste and Water (hereinafter referred to as 'RAAEY'). Once the Producer's Certificate is obtained, projects must proceed with environmental permitting, either via full Environmental Impact Assessment (hereinafter referred to as 'EIA') or, for smaller projects, simplified Standard Environmental Commitments (hereinafter referred to as 'SEC'), depending on the project category. Following environmental clearance, Article 5 regulates the application for a Final Connection Offer (hereinafter referred to as 'FCO') from the competent transmission or distribution system operator (Independent Power Transmission System Operator, hereinafter referred to as 'IPTO' for transmission-level projects and Hellenic Electricity Distribution System Operator, hereinafter referred to as 'HEDNO' for distribution-level projects). The Law introduces strict timelines and a completeness check (Article 5(5)), obliging operators to confirm within 20 days whether applications are complete, and it requires developers to provide a letter of guarantee (Article 6) to ensure seriousness of intent and deter speculative applications. Once the FCO is granted, the developer must apply for an Installation Permit (Article 17), which authorises construction and requires proof of legal use of the site (Article 18). The Installation Permit has a defined duration (Article 19), with provisions for amendment (Article 20), re-issuance (Article 22), or relocation (Article 24). Articles 25 to 30 regulate the entry into operation of the project.

In implementation of Article 40 of Law 4951/2022, the Distribution System Operator (hereinafter referred to as 'DSO'; in Greece that is HEDNO) is required to provide an electronic platform for the submission and management of applications for the addition of storage to RES plants. Access to this platform is restricted to the applicants and requires the use of the tax credentials through the General Secretariat for Information Systems (hereinafter referred to as 'GSIS'), thereby ensuring both transparency and secure digital authentication.

The basis of the priority framework for grid connection in Greece is established by Article 89 of Law 4951/2022 (Government Gazette A' 129/04.07.2022) (evidence 2). On the basis of to Article 89, Ministerial Decision YPEN/GDE/84014/7123 (Government Gazette B' 4333/12.08.2022) (evidence 3) was issued. The Ministerial Decision specifies the framework for prioritizing the granting of Final Connection Offers by the Network and System Operators for RES plants, High-Efficiency CHP plants, and electricity storage units. The Ministerial Decision was amended on specific legislative and technical issues by Ministerial Decision YPEN/DAPEEK/7063/374 (Government Gazette B' 275/20.01.2023) (evidence 4).

The Ministerial Decision YPEN/GDE/84014/7123 (evidence 3) establishes a structured order for granting Final Connection Offers by classifying the projects into six priority groups (A' to ST'), for projects under the jurisdiction of the Transmission System Operator (Article 2), and five priority groups (A' to E'), for projects under the jurisdiction of Distribution System Operator (Article 9). Each group is further classified into subgroups. The classification is based on various criteria such as the inclusion of projects under the Strategic Investments framework, technology, location, ownership. This classification determines the order in which grid connections are granted, with projects in Group A receiving the highest priority (Article 9(5)). For projects falling into the same group, the priority order is determined by the time of the application (Article 9(6)).

The framework established by Article 89 of Law 4951/2022 (evidence 2) and the Ministerial Decision (evidence 3), as amended (evidence 4), has not changed since it took effect. Nevertheless, there are more recent provisions on granting priority to specific projects or certain types of projects, exempting them from this framework. Law 5095/2024 (Government Gazette A' 40/15.03.2024) (evidence 7), in Article 30(12), requires the adoption of a ministerial decision specifying the order of priority in examining requests for Final Connection Offers for projects that belong to groups A or B and have issued bilateral procurement agreements (PPAs). This was operationalized by Ministerial Decision YPEN/DAPEEK /88889/2592 (Government Gazette B' 4918/15.09.2024) (evidence 5). The Ministerial Decision gave absolute priority to Final Connection Offer applications for these specific projects (Tables 2A and 2B of Art. 6).

Finally, Law 5151/2024 (Government Gazette A' 173/04.11.2024) (evidence 6), specifically through Article 40(4) introduces targeted provisions which regulate the terms and conditions under which photovoltaic plant owners may transform their stations into RES plants with integrated storage. To this end, the Law introduces an explicit obligation for competent authorities to give absolute priority to the examination of applications by solar projects interested in installing storage units, covering all licensing stages including the issuance or modification of environmental permitting decisions, which include the Producer Certificates, Final Connection Offers, Installation license, Operation license, and any other required license or approval as stipulated in law 4951/2022. This absolute priority is capped at a total of 600 MW of PV with integrated BESS capacity, distributed equally between the Greek Distribution

and Transmission Systems, thereby ensuring a balanced allocation of priority projects across system levels. Eligible projects include photovoltaic stations that either entered into operation between 4 July 2019 and 31 October 2024 or had received a Final Connection Offer by 31 October 2024. In addition, the legislation imposes a minimum storage capacity requirement equal to at least one hour of the installed PV capacity, thereby ensuring a minimum contribution of storage to grid flexibility.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 358 Development of an incentives-based system for the Distribution System Operator and consumers to increase deployment and utilization of smart meters

**Related Measure:** 5,1.16991 Regulatory framework towards a smart grid

**Qualitative Indicator:** Joint Ministerial Decision/ Decision by the Regulator

**Time:** Q2 2024

### 1. Context:

The objective of this reform is to contribute to the promotion of smart grid technologies and practices in the electricity market of Greece. The main aspects consist of the ability to monitor and control loads and flows in the distribution network; the integration of control technologies with telecoms networks to foster real time engagement with assets and consumers as well as market participants; and the adoption of an enabling legal and regulatory framework to facilitate rapid technology implementation and customer engagement. The policy objectives of the reform are the acceleration of the implementation of smart and digital technologies in the distribution network, and the pursuit of more efficient management of energy usage for the final consumer.

The milestone provides for the entry into force of a Joint Ministerial Decision / Decision by the Regulator for the development of an incentives-based system for the Distribution System Operator and consumers to increase the use of smart meters.

Milestone 358 is the first step of the implementation of the reform. It will be followed by milestone 359 and milestone 360, related to the entry into force of the framework for dynamic pricing contracts, and the operationalisation of the Distribution System Operator Control Center. The reform has a final expected date for implementation of 31 December 2025.

### 2. Evidence provided:

|   | Name of the evidence.                                                                                                                                                                                                                                                                                                                                                  | Short description                                                                                                      |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                                                                         |                                                                                                                        |
| 2 | Cost Benefit Analysis for the Strategic Project of Smart Metering Deployment by Network Operator (HEDNO) November 2024 (Τηλεμέτρηση Πελατών (στρατηγικό έργο 11) Μελέτη κόστους-οφέλους Νοέμβριος 2024)                                                                                                                                                                | Cost Benefit Analysis for the Strategic Project of Smart Metering Deployment                                           |
| 3 | RAAEY Decision E-50A/2025 (Government Gazette B'3608/2025) on the determination of projects of major interest in application of the methodology for calculating the required revenue of the Operator of the Greek Distribution System of Electricity (Government Gazette B 3747/2024) with entry into force on 10 July 2025 based on point (5), page 4 of the Decision | Decision E-50A/2025 regarding incentives-based system for the Operator of the Greek Distribution System of Electricity |
| 4 | RAE Decision 1431/22.10.2020 (Government Gazette B' 4740/26.10.2020) on the Methodology for the calculation of the                                                                                                                                                                                                                                                     | Decision 1431/22.10.2020 regarding the Methodology for the calculation of the Required Revenue of the                  |

|  |                                                                                                                         |                                                          |
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|  | required revenue of the Operator of the Greek Distribution System of Electricity with entry into force 26 October 2020. | Operator of the Greek Distribution System of Electricity |
|--|-------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|

### 3. Analysis:

The justification and substantiating evidence provided by the Greece authorities cover all constitutive elements of the milestone.

**Entry into force of a Joint Ministerial Decision / Decision by the Regulator for the development of an incentives-based system for the Distribution System Operator and consumers to increase deployment and utilization of smart meters.**

The Greek electricity Distribution System Operator (HEDNO) has submitted to the Regulatory Authority for Energy, Water and Waste (RAAEY) an updated Cost-Benefit Analysis regarding the smart meter rollout project. The Cost-Benefit Analysis includes sections on the presentation of the rollout, the cost-benefit analysis of the project, as well as financial information on the project and has served as the analytical basis for developing of the incentive-based system (evidence 2).

The Regulatory Authority for Energy (RAAEY) proceeded with the issuance of Decision E-50/2025 (evidence 3), for the regulatory period 2025-2028. According to the above-mentioned Decision, a premium of 1,5% on top of the approved base Weighted Average Cost of Capital (WACC) for the investments associated with the deployment of smart meters is established as an incentive for the Distribution System Operator (page 6 point 1 of evidence 3).

Furthermore, in line with the description of the measure, **the implementation of the proposed reforms is planned in three distinct thematic areas: Pillar 1: Evolution of a system of incentives for deployment and usage of smart meters. In particular, the reform shall entail the design of a penalty and/or reward system for the Distribution System Operator through the tariff mechanism subject to the attainment of certain Key Performance Indicators related to smart grids deployment and monitoring.**

RAAEY approved an additional premium of 1.5% on the base WACC for the regulatory period 2025-2028 thereby establishing a reward system through the tariff mechanism (page 6 point 1 of evidence 3), while maintaining the right to lower the premium (penalty) in case the approved time schedule for the installation of smart meters (Key Performance Indicator) is not met based on of the annually submitted data by HEDNO to RAAEY (deployment and monitoring) as established by Article 17(3)(iv) of previously issue Decision 1431/22.10.2020 (evidence 4).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 361 Entry into force of primary and secondary legislation on self-consumption and facilitation of permitting processes for the installation of RES stations in apartment buildings

**Related Measure:** 5,1.16992 Toolset to promote energy sharing, self-consumption and renewable Energy Communities

**Qualitative Indicator:** Entry into force of primary and secondary legislation

**Time:** Q1 2024

### 1. Context:

The objective of this reform is to introduce a holistic policy initiative and toolset to promote energy sharing. The reform shall provide the following actions:

- Facilitation and acceleration of the installation of RES stations in buildings;- Put in place the necessary regulatory framework for the implementation of self-consumption, collective self-consumption and self-consumption with virtual net billing, in accordance with Law 5037/2023;
- Establishment of a self-consumers registry and design and implementation of technical assistance measures for renewable Energy Communities and Citizen Energy Communities which shall provide technical and advisory support to the Communities, legal assistance and shall propose solutions for obstacles encountered, provide information on how to set up projects, processes and on how to access funding. In addition to the technical assistance provided, the measures shall also help in the production of capacity building materials, communication and awareness campaigns, outreach initiatives and events (such as workshops).

Milestone 361 requires (1) entry into force of secondary legislation set out in Law 5037/2023. In particular: Entry into force of the Ministerial Decision(s) for the implementation of self-consumption, self-consumption through virtual net billing and collective self-consumption, energy net billing and virtual net billing specifying, stemming from articles 64 and 66 of Law 5037/2023; and (2) entry into force of primary legislation for the facilitation of permitting processes for the installation of RES stations in apartment (or multi-apartment) buildings also to foster collective self-consumption. This shall include rules to facilitate decision making, including the introduction a majority-based process for installing RES.

Milestone 361 is the first step of the implementation of the reform. It will be followed by milestone 362, related to the set-up of the Self-Consumer Registry and the technical assistance for Energy Communities. The reform has a final expected date for implementation in the first quarter of 2025.

### 2. Evidence provided:

|   | Name of the evidence.                                                                                                                                                                                                                                                                                               | Short description                                                                                                                                                 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                      |                                                                                                                                                                   |
| 2 | Joint Ministerial Decision (JMD)<br>"YPEN/DAPEEK/93976/2772" titled "Amendment and replacement of the ministerial decision under reference number<br>YPEN/DAPEEK/15084/382/19.02.2019 'Installation of electricity generation stations by self-producers with the application of energy net metering or virtual net | Secondary legislation:<br>Joint Ministerial Decision (JMD)<br>laying down detailed rules for the application of self-consumption with different offsetting models |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                   |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
|   | metering according to Article 14A of law 3468/2006, as applicable, and by Energy Communities with the application of virtual net metering according to Article 11 of law 4513/2018' (B' 759)" and entered into force on the 05 September 2024 date of publication in the Official Journal (Government Gazette B' 5074/05.09.2024) as stated in Article 19                                                                           |                                                                                                                                   |
| 3 | "Framework for the promotion of biomethane production, rules for the organization of the hydrogen production market and geographically limited hydrogen networks – Partial transposition of Directive (EU) 2024/1788 and other provisions for the protection of the environment." Entered into force on the 04 July 2025 date of publication in the Official Journal (Government Gazette A' 116/04.07.2025) as stated in Article 66 | Primary legislation:<br>Article 58 "Installation of photovoltaic systems and energy storage systems in common areas of buildings" |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Entry into force of secondary legislation set out in Law 5037/2023. In particular: Entry into force of the Ministerial Decision(s) for the implementation of self-consumption, self-consumption through virtual net billing and collective self-consumption, energy net billing and virtual net billing specifying, stemming from articles 64 and 66 of Law 5037/2023.**

The secondary legislation set out in Law 5037/2023 "Renaming the Energy Regulatory Authority to the Waste, Energy and Water Regulatory Authority and expanding its scope with responsibilities over water services and urban waste management, strengthening water policy - Modernisation of the legislation on the use and production of electricity from renewable sources through the incorporation of EU Directives 2018/2001 and 2019/944 - More specific provisions for renewable energy sources and environmental protection" (Government Gazette A' 78/28.03.2023), which has entered into force on 28 March 2023, pursuant to Article 275 of Law 5037/2023, introduces provisions allowing for the implementation of self-consumption, self-consumption through virtual net billing and collective self-consumption, energy net billing and virtual net billing.

As set out in the Joint Ministerial Decision "Amendment and replacement of the ministerial decision under reference number YPEN/DAPEEK/15084/382/19.02.2019 'Installation of electricity generation stations by self-producers with the application of energy net metering or virtual net metering according to Article 14A of law 3468/2006, as applicable, and by Energy Communities with the application of virtual net metering according to Article 11 of law 4513/2018' (B' 759)" (evidence 2, JMD YPEN/DAPEEK/93976/2772, Government Gazette B' 5074/05.09.2024), which has entered into force on 05 September 2024, pursuant to Article 19 of the Joint Ministerial Decision, Article 64 of the amended Law 5037/2023 concerns the implementation of energy and virtual energy clearing by self-consumers and collective self-consumers (p. 3), while Article 66 concerns the application of energy net billing and virtual net billing for self-consumers and collective self-consumers (p. 3).

The Joint Ministerial Decision introduces the scope and definitions related to self-consumption schemes (Art. 1 and 2, p. 3-5) and the technical constraints regarding the maximum power limits of the

power plants (Art. 4, p. 7). According to Article 3 (p. 5), any natural person or legal entity, whether public or private, can participate in energy self-consumption, including Energy Communities (collective self-consumption). Self-consumers must either be the owners of the installation site of the relevant renewable energy sources (RES) project or have secured usage rights (e.g. through lease, free concession, etc.), as well as the written consent of the property owner for the installation of the project.

Article 5 (p. 7-12) of the Joint Ministerial Decision outlines the framework for energy net billing and virtual net billing, including their application, settlement period, applicable charges, and roles of participating entities (self-consumer, supplier, aggregator, grid operator). In both schemes, surplus energy is compensated at the market clearing price through a collaborative process between the grid operator, supplier, and RES aggregator. Regarding net-billing, the competent operator notifies the supplier, self-producer, and RES aggregator of energy data per clearing period, and the RES aggregator pays the self-consumer the monetary value of surplus energy on a monthly basis. Regarding virtual net billing, the RES aggregator calculates surplus, injected, and netted energy, and pays the supplier the netted energy and the self-consumer the surplus energy on a monthly basis.

**Entry into force of primary legislation for the facilitation of permitting processes for the installation of RES stations in apartment (or multi-apartment) buildings also to foster collective self-consumption. This shall include rules to facilitate decision making, including the introduction a majority-based process for installing RES.**

Furthermore, in line with the description of the measure, **the reform shall provide facilitation and acceleration of the installation of RES stations in buildings.**

The primary legislation “Framework for the promotion of the production of biomethane, rules on the organisation of the market for hydrogen production and geographically related hydrogen networks – Partial integration of Directive (EU) 2024/1788 and other provisions on environmental protection” (evidence 3, Law 5215/2025 in Government Gazette A’ 116/04.07.2025), which has entered into force on 4 July 2025, pursuant to Article 66 of Law 5215/2025, introduces comprehensive provisions to facilitate the deployment of photovoltaic systems and energy storage infrastructure within multi-apartment residential buildings (Art. 58, p. 28).

The same legislation promotes collective self-consumption by allowing at least two self-consumers to jointly generate, store, and share energy from photovoltaic systems in common areas. It also establishes a framework for additional co-owners to join the collective self-consumption scheme, ensuring transparent and equitable participation in the sharing of energy produced by the photovoltaic systems (Art. 58, p. 28).

The same legislation further introduces a facilitated decision-making process by stipulating that decisions of the general assemblies of apartment owners regarding the installation of photovoltaic systems in common areas are approved by an absolute majority of 51% of the co-ownership shares (Art. 58, p. 28).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 363 Roadmap for innovative energy efficiency interventions and legal framework established

**Related Measure:** 5,1.16993 Roadmap for innovative energy efficiency interventions and identification of new financial instrument

**Qualitative Indicator:** Entry into force of legislation

**Time:** Q2 2024

### 1. Context:

The objective of this reform is to establish a roadmap for innovative energy efficiency interventions, including the introduction of non-grant financial instruments, in order to provide a further boost for deep renovation of dwellings owned or rented along with the deep renovation of industrial buildings.

Milestone 363 requires the entry into force of a Ministerial Decision adopting a roadmap setting out innovative energy efficiency interventions, including non-grant based financial instruments.

Milestone 363 is the first step of the implementation of the reform. It will be followed by milestone 364, related to the entry into force of secondary legislation launching a non-grant based financial instrument. The implementation of the reform shall be completed by 30 September 2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                     | Short description                                                                                                                                              |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                                           |                                                                                                                                                                |
| 2 | Ministerial Decision ΥΠΕΝ/Δ ΕΠΕΑ/78489/637 of the Minister and the deputy minister for the environment and energy, Official Journal 3686/15.07.202. "Approval of a road map for energy savings in buildings, in accordance with Article 25a of Law 4342/2015 (Government Gazette, Series I, No 143)". Entered into force on 15 July 2025 | Ministerial Decision adopting a roadmap defining specific innovative energy efficiency intervention schemes that include non-grant based financial instruments |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Entry into force of a Ministerial Decision adopting a roadmap that shall set out innovative energy efficiency interventions, including non-grant based financial instruments.**

Ministerial Decision ΥΠΕΝ/Δ ΕΠΕΑ/78489/637 of the Minister and the deputy minister for the environment and energy (point 2 of the evidence provided) entered into force on the day of the publication in the Government Gazette 15 July 2025 as stated in page 56 of point ii of the evidence provided.

Furthermore, in line with the description of the measure, **the reform shall (i) complete a roadmap defining innovative energy efficiency interventions.**

The ministerial decision (point 2 of the evidence provided) sets out a roadmap that defines specific innovative energy efficiency interventions, including non-grant based financial instruments:

- Section 1.4 of the roadmap (point 2 of the evidence provided) establishes that the aim of the roadmap is to highlight optimal measures for the achievement of a **high rate of renovation and the decarbonization of the building stock** and includes a list of **innovative energy efficient interventions** in line with the Greek National Energy and Climate Plan. Additionally, section 1.4 explains that **different instruments** will be put in place for **homeowners, economically vulnerable and energy-vulnerable households, business sector, public buildings or large non-residential buildings (industrial buildings)**.
- Chapter 2 of the roadmap (point 2 of the evidence provided) sets out 20 alternative financial strategies aiming at overcoming barriers and promoting wider acceptance of energy efficiency measures. Most of the mapped tools presented in this Chapter relate **to non-grant-based financial instruments**, such as **on-bill financing**, under which energy efficiency improvement actions are financed by the electricity/gas supplier and the cost of the intervention is repaid by the beneficiary through the supplier's electricity bills or tax incentives to beneficiaries for the implementation of energy-savings interventions in homes and businesses premises.
- Chapter 3 of the roadmap (point 2 of the evidence provided) identifies, analyses, and prioritizes a set of key instruments which foresee **either fiscal incentives or other financial tools** to support energy efficiency in the building sector and are selected based on their technical maturity, market applicability, and capacity to mobilize private capital. These instruments cover a broad spectrum of intervention types and end-user profiles. Each is supported in the roadmap by implementation pathways, legal and regulatory prerequisites, stakeholder roles, and financial flow scenarios. These key instruments are:
  - Competitive Procedures on Energy Efficiency (section 3.1) – potentially non-grant based financial instrument (depending on the design of the scheme)
  - On-Bill Financing (OBF) (section 3.2) – non-grant based financial instrument
  - Tax Incentives & Fiscal Instruments (section 3.3) – non-grant based financial instrument
  - Energy Performance Contracts (EPCs) (section 3.4) – potentially non-grant based financial instrument (depending on the design of the scheme).

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled**

**Number and name of the Milestone:** 365 Approved energy storage projects

**Related Measure:** 5,2.16996 Installation of energy storage for additional RES penetration

**Qualitative Indicator:** Approval decision

**Time:** Q2 2024

### 1. Context:

The objective of this measure is the installation of stand-alone grid scale storage systems and is an upscaling of Measure 16926 ("Support of the installation of storage systems to enhance RES penetration"). The investment is expected to result in the installation of new energy storage facilities with a capacity of at least 175 MW.

The milestone requires that the Regulatory Authority for Energy, Waste, and Water (*hereinafter referred to as "RAAWW"*) has published its approval decision for selected battery storage projects with a storage capacity of, at least, 175 MW.

Milestone 365 is the first step of the implementation of the investment. It will be followed by milestone 366, related to the installation of the energy storage systems for the selected projects. The investment has a final expected date for implementation by Q4/2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                              | Short description                                                                                                                                                         |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                    |                                                                                                                                                                           |
| 2 | Decision by "RAAWW" for the conduct of the 3 <sup>rd</sup> competitive bidding procedure for the granting of investment and operational support to battery energy storage systems<br><br>Published in the Official Journal B 7023/20.12.2024 (entry into force: 20 December 2024) | Call of interest by "RAAWW" for the 3 <sup>rd</sup> auction for the support to Battery Energy Storage Systems, along with the annexes containing technical specifications |
| 3 | Approval decision by "RAAWW" for projects for a total of 175 MW of electricity storage capacity installed.<br><br>Protocol Number:<br>O-114857/21.03.2025<br>ADA: PX1QIΔΞ-3ΛH                                                                                                     | Decision by "RAAWW" that selects the energy storage projects that took part in the call/auction and have an overall electricity storage capacity of 175 MW                |

### 3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

**Publication of approval decision by "RAAWW" for projects for a total of 175 MW of electricity storage capacity installed.**

Through a decision by the competent public entity, Regulatory Authority for Energy, Waste, and Water ("RAAWW"), a call was launched for the selection of electricity storage projects (evidence 2). "RAAWW"

adopted a decision (evidence 3), which was published on its website on 21 March 2025, that confirmed the selection of electricity storage projects that took part in the aforementioned call/auction. Page 14 of the decision (evidence 3) lists the selected electricity projects, which have an aggregated storage capacity of 188.9 MW.

Furthermore, in line with the description of the measure, **the investment is an enhancement of the second sub-programme of the investment with No.16926 under the existing RRP, which relates to the development of stand-alone grid scale storage systems and aims to allow the further development of such storage capacity.**

Section 1.3 of the call (evidence 2) sets out details of the three calls launched, with the 1<sup>st</sup> and 2<sup>nd</sup> call launched under Measure 16926 of the Greek RRP (“Installation of energy storage for additional RES penetration”). Further, section 8.1.1 (evidence 2) sets out requirements that the electricity storage system of the launched call/auction (i.e. 3<sup>rd</sup> call) falls under the category ‘stand-alone grid scale storage systems’. Further technical details on these requirements are specified by the data sheet in Annex B1 (evidence 2), which sets out that a stand-alone battery energy storage system needs to be able to inject  $\geq 1$  MW into the high-voltage grid and to deliver a discharge duration of  $\geq 4$  hours, which is consistent with the technology requirements for “stand-alone grid scale storage systems”.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Target:** 368 Installation of photovoltaic systems for auto-consumption

**Related Measure:** 5,2.16994 Energy Efficiency and promotion of RES for auto-consumption

**Quantitative Indicator:** Number of installed PV systems

**Baseline:** 0

**Target:** 11 580

**Time:** Q2 2024

### 1. Context:

The objective of this investment is to improve energy efficiency and the deployment of renewable energy in multiple sectors. The measure consists of six sub-investments. One of the sub-investments provides support for the installation of photovoltaic systems, in order to foster the auto-consumption of the produced electricity through net metering in residential buildings and agricultural units.

This target concerns the installation of 11,580 photovoltaic (PV) systems for auto-consumption in residential buildings and agricultural sector. Out of the 11,580 PV systems installed, at least 900 will be for energy-poor households and 360 for farmers.

Target 368 is the second target of the investment, and it follows the completion of milestone 367, which concerned the launch of the various support programmes, including for the sub-investment for the PV systems for auto-consumption. It will be followed by target 369, related to the completion of the remaining five sub-investments. The investment has a final expected date for implementation in Q4/2025.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                  | Short description                                                                                                                                                                                                                                                                                                                                                               |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                        |                                                                                                                                                                                                                                                                                                                                                                                 |
| 2 | List of completed projects - installation of PV System                                                                                                                                | The list includes the completed projects and for each of them: type of eligible interventions and final recipient (i.e. households, energy-poor households, farmers) reference of the certificate of installation of PV systems                                                                                                                                                 |
| 3 | Sampling documents: electrification certificate issued by Hellenic Electricity Distribution Network Operator SA (HEDNO) for 60 beneficiaries for which PV systems have been installed | The electrification certificate allows for cross-checking with evidence 2, as it includes details of the unique electricity supply number of the beneficiary.                                                                                                                                                                                                                   |
| 4 | Sampling documents: certificate confirming category of beneficiaries                                                                                                                  | For sub-category 'energy-poor households': screen shot from the IT system managed by HEDNO for the 'social residential tariff' scheme (i.e. Κοινωνικό Οικιακό Τιμολόγιο – KOT) that includes details of the electricity supply number.<br><br>For sub-category 'farmers' sub-group: certification issued by the Ministry of Rural Development and Food that the physical person |

|  |  |                                                                                                                                                                           |
|--|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  | is part of the “Registry of Farmers and Agricultural Holdings”, which includes details of the tax identification number (referred to as ‘VAT number’ in the excel table). |
|--|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### 3. Analysis:

The justification and substantiating evidence provided by the Greece authorities cover all constitutive elements of the target.

**Photovoltaic (PV) systems for auto-consumption in residential buildings and agricultural sector: 11 580 PV systems installed, out of which 900 shall be for energy-poor households and 360 for farmers.**

The call for proposal launching the support programme of PV systems for auto-consumption was assessed as part of Milestone 367 as part of the 5<sup>th</sup> payment request, therefore, the present analysis does not cover its assessment. A list was submitted with details of the 12,204 PV systems that have been installed (evidence 1). This table also sets out details for 2,224 PV systems installed for energy-poor households and 631 PV systems installed for farmers.

The evidence provided for a sample of 69 units, which contained units from the two sub-group targets (i.e. energy-poor households and farmers). In order, for the two sub-group targets to both include, at least, 10 units in the sampling population, an additional two units of ‘energy-poor households’ and seven units of ‘farmers’ were added to the overall sampling population, which resulted in the overall number of the sampling population being 69. The evidence is an electrification certificate issued by HEDNO (Hellenic Electricity Distribution Network Operator S.A.) that includes details of the beneficiary, including the unique electricity supply number (evidence 2, column B). The electrification certificate issued by HEDNO certifies the installation of the PV system and is necessary for the release of the payment to the beneficiary. For the sampling population concerning ‘energy-poor households’ and ‘farmers’ specific evidence in the form of i) for the energy-poor households: extract from the beneficiaries of the ‘social residential scheme’ managed by HEDNO, which included the electricity supply number; and ii) for the farmers: certificate from the registry of ‘farmers and agricultural holdings’ managed by the Ministry of Rural Development and Food, which included the tax identification number, confirmed the sampling units where the specific beneficiary was part of one of these two categories.

Following the selection of a random sample of 69 units, Greece submitted the evidence described in the previous paragraph for the sampling exercise. The evidence provided allowed for the confirmation of the installation of the PV systems included in the sample and that some of the beneficiaries belonged to the two sub-group target populations (i.e. energy-poor households and farmers). The evidence provided for a sample of 69 units confirmed that the requirements of the target have been met. First, that 12,204 PV systems have been installed, thus exceeding the goal of Target 368 (the target under assessment) by 624 – the difference between the goal and what the Member State actually achieved. Second, that beneficiaries of the installed PV included 2,224 for energy-poor households and 631 for farmers, thus exceeding the respective sub-goals of Target 368 (the target under assessment) by 1,324 for energy-poor households and 271 for farmers - the difference between the sub-goals and what the Member State actually achieved.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled

**Number and name of the Milestone:** 370 Issuance of Joint Ministerial Decision for the provision of the grant to the beneficiary

**Related Measure:** 5,2.16995 Renewable Hydrogen production project

**Qualitative Indicator:** Issuance of Joint Ministerial Decision

**Time:** Q2 2024

### 1. Context:

The objective of this investment is to foster renewable hydrogen in Greece through the provision of financial support to companies. The investment shall support the installation of the required equipment for the production of renewable hydrogen, such as the installation of the electrolyzers, the necessary ancillary equipment and an electrical substation, the installation of a hydrogen network for the compression, conditioning, metering and purification (purification unit), transmission and distribution of the hydrogen from the electrolyser to the off-takers, as well as the injection facility.

Milestone 370 requires issuance of the Joint Ministerial Decision for the provision of the grant to the Beneficiary for at least 45 MW of new installed renewable hydrogen.

Milestone 370 is the first step of the implementation of the investment. It will be followed by target 371, related to at least 45 MW renewable hydrogen production capacity installed. The investment has a final expected date for implementation in the fourth quarter of 2025.

### 2. Evidence provided:

|   | Name of the evidence.                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Short description                                                                               |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| 1 | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled                                                                                                                                                                                                                                                                                                                                             |                                                                                                 |
| 2 | Joint Ministerial Decision (JMD) "YPEN/PMO/79658/3232" between the Ministers of Environment and Energy and Economy and Finance regarding the "Procedure for granting and disbursing investment aid through the Public Investment Program for the Project 'Renewable Hydrogen Production,' which has been included in the Recovery and Resilience Fund." Official Journal, Government Gazette B' 3801/17-07-2025<br>Entry into force on 17 July 2025 as stated in Article 7 | Joint Ministerial Decision (JMD) laying down the grant agreement to the beneficiary (Motor Oil) |

### 3. Analysis:

The justification and substantiating evidence provided by the Greece authorities cover all constitutive elements of the milestone.

**Issuance of Joint Ministerial Decision for the provision of the grant to the Beneficiary for at least 45 MW of new installed renewable hydrogen.**

Furthermore, in line with the description of the measure, **the investment shall support the installation of the required equipment for the production of renewable hydrogen, such as the installation of the electrolyzers, the necessary ancillary equipment and an electrical substation, the installation of a**

**hydrogen network for the compression, conditioning, metering and purification (purification unit), transmission and distribution of the hydrogen from the electrolyser to the off-takers, as well as the injection facility.**

The Joint Ministerial Decision “Procedure for granting and paying investment aid through the Single Investment Programme for the ‘Renewable Hydrogen Production Project’ included in the Recovery and Resilience Fund (IIS code TA 5225770 – ADA DIDIDIH-ZMB)” (evidence 2, JMD No. 3801, Official Journal B’ 3801/17-07-2025, Article 2, p. 3), which has entered into force on 17 July 2025, pursuant to Article 7 of the Joint Ministerial Decision, provides that the grant to the beneficiary concerns the project ‘Renewable Hydrogen Production’, which includes the design, construction and installation of a renewable hydrogen production plant with a total final capacity of 50 MW, including the installation of the equipment required for the production of renewable hydrogen, such as the installation of electrolyzers (alkaline pressurised electrolysis unit), the necessary auxiliary equipment and an electrical substation; the installation of a hydrogen network for the compression, preparation, measurement and purification (cleaning unit), the transmission and distribution of hydrogen from the electrolyte to the recipients, as well as the injection facility.

According to the Joint Ministerial Decision (Article 2, p. 3), the beneficiary is entitled to receive part of the grant as an advance, equal to a maximum of thirty percent (30 %) of the total amount of the grant. Additionally, upon completion of the physical and financial components of the project, namely the construction of a renewable hydrogen production plant with a total final capacity of 50 MW using an alkaline pressure electrolysis unit, an electricity substation, and all necessary equipment and infrastructure for the production, processing, purification, preparation, pressing, blending of hydrogen in the gas turbine cogeneration plant of the refinery and distribution of hydrogen to end-users/consumers; including a vanadium, measuring data and tube trailers and loading equipment, the beneficiary must receive part of the aid as a last instalment, equal to a maximum of the remaining amount of investment aid.

Furthermore, in line with the description of the measure, **for the production of renewable hydrogen only electrolysis shall be used. The production of recycled carbon fuels shall not be foreseen as part of this investment.**

Furthermore, in line with the description of the measure, **the production of renewable hydrogen needs to comply with the Renewable Energy Directive and its delegated acts (2018/2001/EU).**

The Joint Ministerial Decision (evidence 2, Article 5, p. 5) provides that the beneficiary is obliged to use only electrolysis for the production of renewable hydrogen.

The Joint Ministerial Decision (evidence 2, Article 5, p. 5) provides that the beneficiary must ensure that, throughout the lifetime of the project, only renewable hydrogen, within the meaning of Article 25 (1) (e) of Law 5215/2025 “Framework for the promotion of the production of biomethane, rules on the organisation of the market for hydrogen production and geographically related hydrogen networks – Partial integration of Directive (EU) 2024/1788 and other provisions on environmental protection” (Government Gazette, Series I, No. 116) is produced in the hydrogen production plant, in compliance with the Renewable Energy Directive and its delegated acts (2018/2001/EU). In addition, the project owner must submit an annual report to the Directorate for Renewable Energy Sources (RES) and Alternative Fuels of the Ministry of the Environment and Energy, together with all relevant documentation confirming that only renewable hydrogen is produced.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled