CONTRIBUTION TO CALL FOR EVIDENCE

EC Initiative: Simplification of administrative burden in environmental legislation
Contribution by: WWF Greece
Deadline: **10 September 2025**

General statement

Simplification of EU environmental law must not be used as a pretext to weaken or dismantle existing environmental targets and obligations. The objectives enshrined in the EU's environmental acquis remain as vital as ever—they are fundamental to safeguarding public health, biodiversity, and the climate. We call on the EC to safeguard flagship laws such as the Habitats and the Birds Directives, the Water Framework Directive and the Nature Restoration Regulation, which have already undergone thorough scrutiny, both through comprehensive impact assessments prior to their adoption and through subsequent fitness checks.

In Greece, more than 90% of environmental legislation stems directly from EU law. This framework has enabled the creation of the national system of protected areas, strengthened pollution prevention and industrial risk control, and advanced national efforts in addressing and adapting to climate change. EU environmental law has thus been the backbone of Greece's progress, complemented by substantial EU financial support. For example, during 2007–2013, Greece received €1.8 billion in EU funding to improve waste management, protect ecosystems, and strengthen pollution treatment.

Greece has benefited enormously from this collective European effort. The challenge before decision-makers is therefore not to dilute the acquis, but to uphold and further strengthen it.

Effective implementation and enforcement of EU environmental legislation are critical. The cost of inaction far outweighs the cost of action: the most recent Environmental Implementation Review (EIR) estimates that failure to fully implement existing EU laws result in annual costs of approximately €180 billion, or 1% of EU GDP.

At this point, we wish to draw your attention to a particularly concerning issue, regarding the stated intention of the Commission to proceed with the revision of the Industrial Emissions Directive (IED). Specifically, we note that although the consultation stems from a stated aim of the Commission to reduce the administrative burden for small and medium enterprises (SMEs), nevertheless the simplification process launched through this consultation also targets the Industrial Emissions Directive, which covers large industrial plants and has nothing to do with SMEs. Yet, the health and environmental quality benefits for Europeans through the implementation of the EU's industrial emissions legislation are immense and invaluable.[1]

Moreover, regulation at the EU level reduces administrative burdens and institutes a level playing field for European businesses, in contrast to the chaotic alternative of allowing 27 separate national regimes to exist. Weakening standards would discriminate against companies that have already invested in sustainable practices, while rewarding laggards. Such a rollback would create unfair competition, erode trust, and undermine the incentives needed for a genuine green transition.

[1] https://www.eea.europa.eu/publications/greening-the-power-sector-benefits/benefits-of-an-ambitious-implementation

Instead of revising or lowering existing standards, efforts should focus on improving implementation. This includes harnessing digital innovation, providing clearer guidance, fostering active stakeholder engagement, strengthening the efficiency of national administrations, and building the staffing and capacity of competent authorities. Stronger inspections and enforcement are equally crucial.

In Greece, our position in support of a robust body of EU environmental laws is consistent with the findings of the 2014 OECD report on the reduction of administrative burdens (discussed further below),[2] which highlighted persistent challenges in areas such as tax law, company law and annual accounts, and public procurement. Unfortunately, little progress has been made since then, underscoring the need for systemic improvements in governance and enforcement, rather than deregulation of protections.

The Birds and Habitats Directives: Safeguarding nature in Greece

The Birds and Habitats Directives (BHD) form the cornerstone of the EU's environmental legal framework and remain crucial in tackling biodiversity loss. In Greece, EU nature law has provided the only legal basis under which a national system of protected areas has been established and continues to operate, despite significant delays and shortcomings. Continuous monitoring by the European Commission of Greece's compliance with the BHD serves as the single most effective safeguard against attempts by successive governments to undermine nature protection in favour of short-term private interests.

As a direct result of EU nature legislation, Greece now hosts one of the largest networks of protected biodiversity hotspots in Europe, covering more than 27% of its land area. Flagship conservation areas—including the famous Dadia Forest, the so called "land of raptors", Lakes Prespa and Kerkini, and the Zakynthos National Marine Park, owe their protection to the BHD. These achievements demonstrate the irreplaceable role of EU environmental law.

The infringement procedures mechanism, which is essential in the European Commission's mission to fulfil its role as guardian of the EU Treaties, is crucial. While Greece has a persistently poor record on the implementation of EU environmental law, the possibility of an infringement procedure carries a political cost that can act as a powerful incentive for compliance and better implementation. Weakening the Commission's monitoring and investigative capacity in recent years is deeply concerning.

The 2025 Environmental Implementation Review (EIR) country report for Greece[3] illustrates the ongoing challenges. In 2020, the Court of Justice of the EU condemned Greece for failing to establish the necessary conservation objectives and measures for Natura 2000 sites designated as SACs. Since then, Greece has adopted site-specific conservation objectives, but in most cases these remain undermined by insufficient data. A permanent monitoring system for species and habitats is urgently needed. Furthermore, the majority of sites still lack the required conservation measures. While 23 special environmental studies and corresponding management plans have been commissioned for 446 areas of the Natura 2000 network, only five of these have so far been approved. Despite the delays and shortcomings, in a country where sustainable development policies remain underdeveloped, such progress would not have been possible without the obligations and oversight established by EU nature legislation and the funding provided under the LIFE Programme.

The Commission's infringement procedures remain indispensable in ensuring compliance and in pushing Greece toward higher standards of nature conservation. Without this EU-level pressure, national authorities would lack both the incentive and accountability to meet their obligations.

It should also be recalled that the EU's nature directives underwent a comprehensive fitness check in 2016, which concluded that they are "fit for purpose." The primary challenge identified was not their

[2] https://www.oecd.org/content/dam/oecd/en/publications/reports/2014/09/measurement-and-reduction-of-administrative-burdens-in-greece_g1g42695/9789264213524-en.pdf
[3] https://environment.ec.europa.eu/publications/2025-environmental-implementation-review-country-report-greece_en

design but their insufficient implementation. That conclusion remains valid today. Reopening or revising the BHD would generate legal uncertainty, disrupt the progress already underway, and undermine the new Nature Restoration Regulation, which builds on and complements the Birds and Habitats Directives. At a time of accelerating biodiversity and climate crises, weakening the EU's most effective environmental laws would be counterproductive and irresponsible.

Nature restoration law

The Nature Restoration Regulation (NRR) sets an EU-level target to put effective, area-based restoration measures in place covering at least 20% of land and sea by 2030, and on all ecosystems in need of restoration by 2050. This is particularly important in the case of Greece, as public policies promoting nature restoration are non-existent. An open letter signed by 6,000 scientists showing scientists' consensus that the law is evidence-led rather than bureaucratic. Senior European researchers' framing of the NRR as an evidence-based policy instrument built on established methods (EEA/JRC mapping, indicators, monitoring).

The NRR requires the Member States to give the public and all relevant stakeholders early and effective opportunities to participate in the preparation of the NRPs. It also does not set legal obligations for landowners, forest owners and farmers and is therefore not interfering with property rights. Far from being "red-tape", the NRR offers the Member States a lot of flexibility in its implementation and the NRR gives a lot of opportunity to take into account regional and socio-economic considerations. While the restoration targets are concrete and science-based, how the targets will be achieved and where the restoration actions will take place, is decided by the Member States via the drafting of the NRPs.

In anticipation of the approval of the NRR, Greece proceeded with passing its first nature restoration provisions into new law (Law 5037/2023, articles 173-178): measures for the restoration of terrestrial freshwater and marine ecosystems, primarily within Natura 2000 sites, are already enshrined in Greek Law – synchronous implementation and mutual support and exchange of best practices within all EU is crucial.

Halting the NRR would jeopardise Europe's capacity to adapt to climate change, secure food and water and reduce disaster risks - some of the very co-benefits that restoration delivers. Restoring degraded ecosystems yields wide co-benefits: it supports climate mitigation and adaptation; reduces flood and drought risks; improves water and air quality, soil health and pollination (and thus food security); cools cities and benefits public health; and underpins jobs and sustainable growth. The Commission's impact assessment shows benefits vastly outweigh costs (≈€1.86 trillion vs €154 billion across key habitats).

Healthy ecosystems are foundational for climate resilience and food security. Restored wetlands and floodplains act as natural buffers against floods (reducing disaster risk), healthy soils and pollinators are critical for crop production (ensuring food supply), and forests help regulate water cycles (securing clean water). During the political discussions on the NRR, many companies highlighted their support for this legislation, pointing out that healthy ecosystems are key to securing their supply chains. 72% of companies in the Eurozone depend on healthy and restored ecosystems to thrive.

The economic case for investing in nature restoration is strong. The EC estimates €8–€38 in benefits for every €1 invested in restoration, reflecting avoided flood damage, climate resilience, soil fertility, pollination, health co-benefits, etc. another argument to implement the law as it is.

Water Framework Directive

Greece being one of the countries in Europe faced with very high risk of water scarcity, as stated in the Seasonal Water Exploitation Index, the significance of proper implementation and strengthening

the water and floods directives is a matter of utmost importance for the avoidance of the super high costs of droughts through nature-based conservation of freshwater resources, flood prevention and

Figure 2. Worst seasonal water scarcity conditions for European countries in 2022, measured by the water exploitation index plus (WEI+)

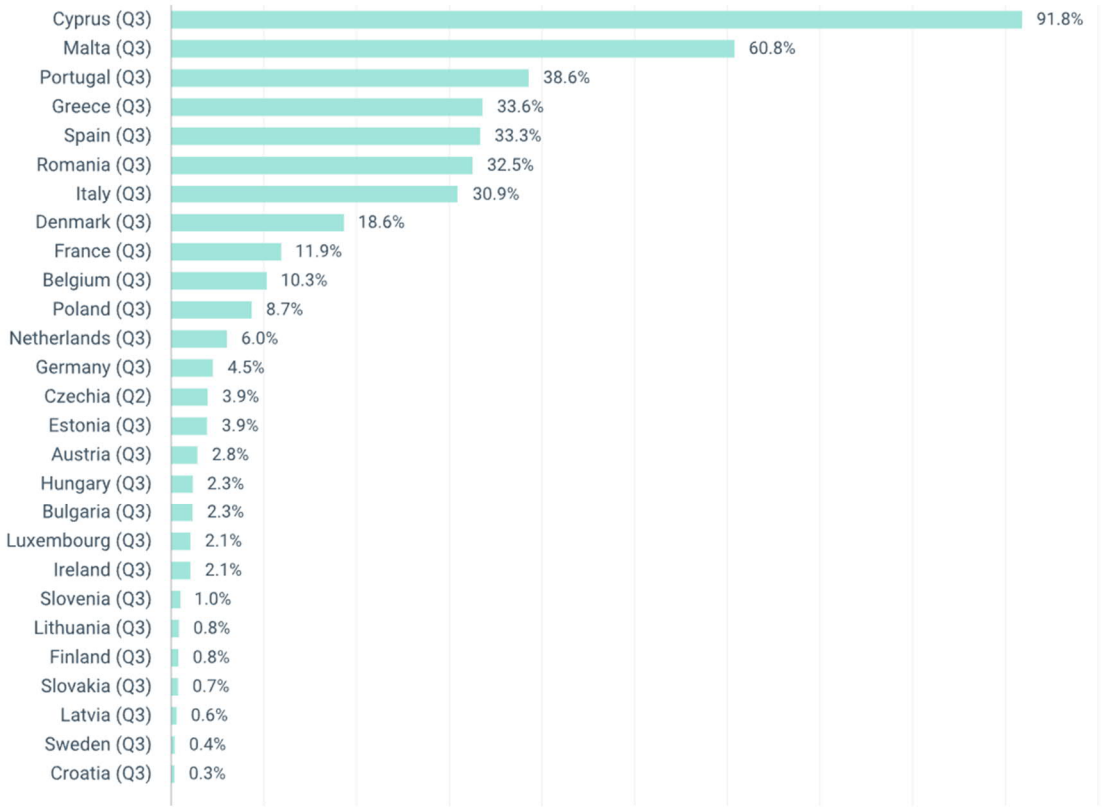


Figure 1 https://www.eea.europa.eu/en/analysis/indicators/use-of-freshwater-resources-in-europe-1

The Water Framework Directive (WFD) requires all Member States to achieve good status for all water bodies at the latest by 2027 and to prevent deterioration of rivers, lakes, estuaries, wetlands, and groundwater. This objective remains unmet, but it is more urgent than ever. Europe's rivers, lakes, and aquifers are the very sources of the water we rely upon for drinking, sanitation, food production, energy generation, industry, and services. Clean water bodies are not only vital for public health and ecosystems—they also reduce the cost of treatment, support high-quality food production, and strengthen Europe's competitiveness.

The WFD, which underpins the EU Water Resilience Strategy, was assessed in 2020 through a Fitness Check and found to be "fit for purpose". The Directive must therefore be preserved and reinforced, not weakened.

The WFD has provided Greek public authorities and businesses with the legal standards and the tools needed to plan and prioritise long-term investments in water protection. Deregulating the WFD would create legal uncertainty and undermine these investment decisions, slowing down progress where acceleration is urgently needed.

Proposals from some industry representatives to modify Article 4(7) are of particular concern. These include Article 4 (7) to make the existing derogation applicable to good chemical status, not only to good ecological status of surface water. Some also want to grant the derogation for all types of

modifications to a water body, not just for modifications to physical characteristics, and to allow the inclusion of impacts on surface water bodies resulting from modifications to a groundwater body.

Such changes would significantly weaken the WFD and risk opening the door to major downstream impacts. For example, authorising derogations that permit changes to water chemistry would make it easier for pollution discharges to be justified, with consequences spreading far beyond the site of impact. This would undermine the very purpose of the Directive.

Extending derogations to cover chemical status is also contradictory to the objectives of the revised Urban Waste Water Treatment Directive (December 2024). The new provisions of that Directive explicitly seek to tackle pollutants such as microplastics and micropollutants, while strengthening the polluter-pays principle. Allowing chemical derogations under the WFD would directly contradict this ambition and weaken coherence across EU environmental legislation.

The Water Framework Directive must be protected as the robust backbone of Europe's water policy. It ensures the long-term protection of Europe's freshwater resources, which are particularly threatened under the climate crisis, supports resilience to climate change, and provides the certainty required for sustainable investments. Its goals must not be diluted. Instead, the focus must remain on strengthening implementation and enforcement in order to deliver healthy rivers, lakes, and aquifers for people, ecosystems, and the economy.

EU Deforestation Regulation

Businesses in the EU, their suppliers in third countries, as well as EU Member States and third country governments, have invested to ensure compliance with the EUDR on time since its adoption in 2023. Changes to EUDR requirements at this late stage would undermine these investments and create legal and economic uncertainty.

The EUDR places obligations on operators that are proportionate to risk. Minimum geolocation and traceability requirements for all operators are a safety net for compliant products sold on the EU market and are key for enforceability. Experience with the EUTR shows that enforcement is seriously hampered by lack of data from all products on the EU market. The information provided by due diligence statements in the EUDR Information System will enable comprehensive risk analyses and targeted checks within commodity groups. Minimum check levels for all risk categories should enable a more harmonised enforcement across Member States and less opportunities for circumvention by unscrupulous market players.

Calls for simplification via a negligible or zero risk category ignore existing obligations under the EU Timber Regulation and illegality and forest degradation risks in the EU

Administrative burden in Greece

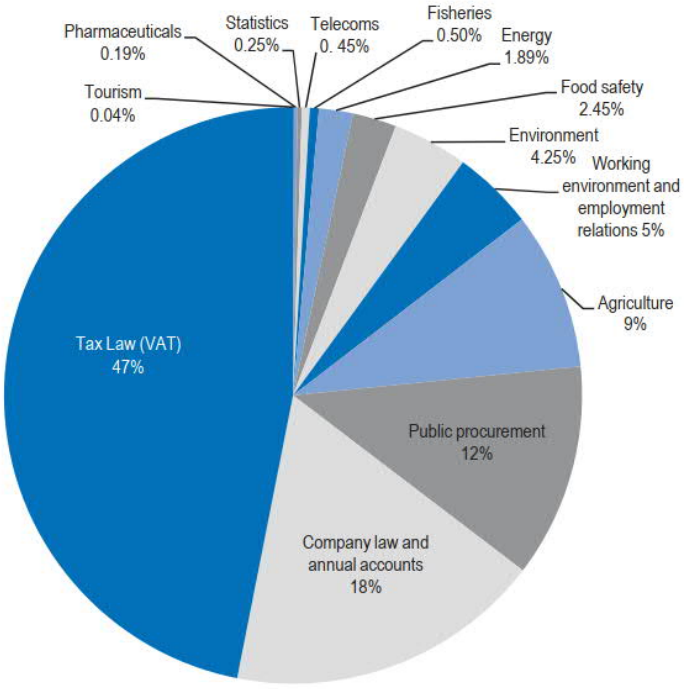
In 2014, the OECD report "Measurement and Reduction of Administrative Burdens in Greece: An Overview of 13 Sectors"[4] was published, in the context of the Greek economic adjustment programme for Greece and the fiscal supervision by the European Commission, the International Monetary Fund and the European Central Bank. which includes sectoral reports on the environment, energy and tourism. Greece has committed to implementing the OECD recommendations described in this report as part of implementing the new macroeconomic adjustment programme. The conclusions of the 2014 OECD report for Greece are still absolutely valid.

The OECD report concluded that administrative burdens to businesses and the public sector stemming from environmental legislation were negligible (no wonder). By order of total administrative burden and major hurdles for businesses in Greece stemming from the 13 sectors examined, the environmental sectors ranks just 6th, with only 4.25%.

Administrative burdens in 13 key Greek sectors: Results and recommendations

The total administrative burdens identified were EUR 3.28 billion, and administrative costs EUR 4.08 billion.

Figure 2.1. Total administrative burdens identified by priority area



Source: OECD (2014), data collected from the project on measuring administrative burdens in Greece.

MEASUREMENT AND REDUCTION OF ADMINISTRATIVE BURDENS IN GREECE: AN OVERVIEW OF 13 SECTORS © OECD 2014

[4] https://www.oecd.org/content/dam/oecd/en/publications/reports/2014/09/measurement-and-reduction-of-administrative-burdens-in-greece_g1g42695/9789264213524-en.pdf

Specific cases of environmental wins in Greece thanks to EU law

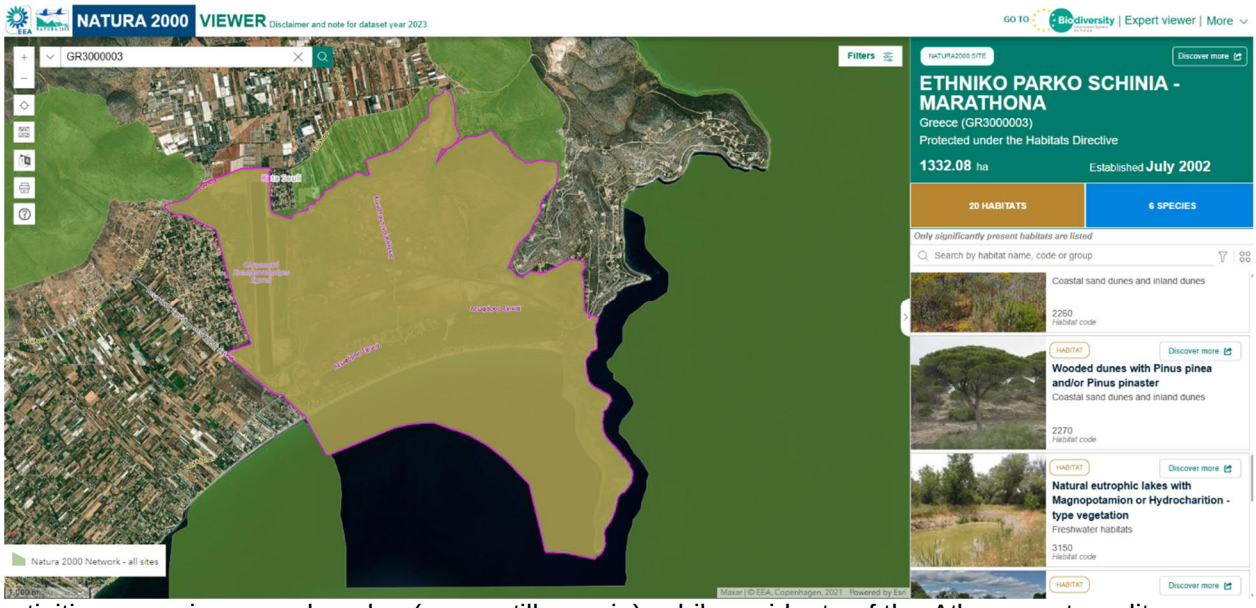
As documented in the annual *Environmental Law Reviews for Greece* published by WWF Greece (2005–2019),[5] EU environmental law has been the primary driver of environmental protection and nature conservation in Greece, especially in the last three decades. Below are a few more specific examples of significant achievements for the environment and public health, all made possible through the EU's legal framework, combined with enforcement by the European Commission and the persistent and diligent work of civil society.

1. Zakynthos National Marine Park – Protecting the Caretta caretta sea turtle

The National Marine Park of Zakynthos was established solely because of the EU Habitats Directive and the pressure exerted by the European Commission. Case C-103/00 before the Court of Justice of the EU led to a milestone ruling obliging Greece to safeguard the nesting sites of the loggerhead turtle (*Caretta caretta*). This resulted in the park's official creation and the establishment of its management body, with the infringement case closed in 2007. The EU's role has been equally decisive in preventing illegal coastal development and securing the closure of a highly polluting landfill threatening a key nesting beach (case INFR(2009)2340). Today, the park is both a globally renowned biodiversity hotspot and a valuable asset for the tourism economy of Zakynthos.

2. Marathon National Park – Removal of illegal developments in Schinias

The designation of the historically and ecologically significant Schinias–Marathon area as a national park in 2002, following its inclusion in the Natura 2000 network, was achieved thanks to Commission pressure dating back to 1998. As a result, illegal taverns and beach bars damaging the rare *Pinus pinea* coastal forest on sand dunes were finally demolished in 2018, thanks to pressures from the European Commission. Today, the ecosystem has visibly recovered from the heavy impact of illegal



activities spanning over decades (some still remain), while residents of the Athens metropolitan area

[5] All 15 reports, originally written in Greek, are available here: https://www.wwf.gr/ti_kanoume/anthropos/perivallontiki_dimokratia/veltiosi_tis_perivallontikis_diakyvernisis/

enjoy access to one of Greece's most ecologically and historically significant coastal landscapes, safeguarded through EU nature law.

3. Safe drinking water in Central Macedonia[6]

Case 2004/4602, concerning breaches of the Drinking Water Directive, revealed dangerously high concentrations of arsenic, nitrates, and ammonia in the Region of Central Macedonia. Exposure to this poor-quality water had been linked to elevated cancer rates. The subsequent implementation of EU law led to the construction of water treatment and purification infrastructure, improving the health of 49,000 households and saving an estimated €100,000–500,000 annually in avoided healthcare costs.

4. Cleaner Seas for Athens – The Saronic Gulf

For decades, untreated urban wastewater from Athens polluted the Saronic Gulf. The Commission closely monitored and took persistent action against Greece for non-compliance with EU waste legislation, focusing on the inadequate operation of the Psittalia wastewater treatment facility.[7] With substantial EU co-financing, the plant was upgraded and entered its third operational phase in 2007. Subsequent monitoring recorded a marked improvement in water quality, with most beaches around the Saronic Gulf now safe for swimming. This case demonstrates how EU pollution control law, backed by funding and enforcement, delivered tangible benefits for ecosystems, public health, and quality of life.

5. Cleaner air, waters and soils thanks to the IED

For Greece, the implementation of the IED (and the IPPC before 2010) has been crucial in reducing pollution from large industrial plants, which were not at all checked before the two industrial pollution control directives entered into force. As mentioned in the 2025 EIR for Greece, "*in Greece, around 390 industrial installations are required to have a permit based on the IED, with the majority of them being in the waste management sector, including landfills (29 %), followed by the intensive rearing of poultry and pigs (16 %), the energy sector (10 %) and the food and drink sector (10 %)*." As mentioned in "Greece's Informative Inventory Report (IIR) 2024", highly dangerous pollutants, such as the non-methane volatile organic compounds (NMVOCs), have more than halved since 1990: "*NMVOC emissions decreased from 319.49.01 kt in 1990 to 138.02 kt in 2022. The emissions in 2022 have been decreased by 56.8% and 59.0% compared to 1990 and 2005, respectively. This decrease is attributed to the implementation of the Directives 1999/13/EC, 2004/42/EC and 2010/75/EU on the limitation of emissions of volatile organic compounds due to the use of organic solvents; the Directives 94/63/EC and 2009/126/EC on the control of volatile organic compound emissions resulting from the storage and distribution of petrol; and the reduction of emissions in the road transport sector, due to the renewal of vehicle fleet*."[8]

A report published by the European Commission in 2018, evaluating the level of implementation and the achievements of the IED in Greece, stated the obvious: the people in Greece have benefited from

[6] European Commission: Directorate-General for Environment, COWI and Milieu Ltd, *Study to assess the benefits delivered through the enforcement of EU environmental legislation – Final report*, Publications Office, 2016, https://data.europa.eu/doi/10.2779/043074
[7] https://ec.europa.eu/commission/presscorner/detail/en/ip_03_1108
[8] Ministry of Environment and Energy (Greece). (2024). *Greece's Informative Inventory Report 2024: Submission under the UNECE Convention on Long-range Transboundary Air Pollution and Directive (EU) 2016/2284 on the reduction of national emissions of certain atmospheric pollutants*. Athens. Retrieved from *Ministry of Environment and Energy* website: YPEN (Greece).

huge and measurable decrease of pollutants that cause detrimental impacts on human health and on natural resources and ecosystems. Particularly the power sector, until then dominated almost entirely by the use of highly polluting lignite, but also other types of industrial plants were obliged to achieve drastic improvements in their environmental profile, all thanks to the IED and the rigorous supervision by the Commission of its implementation:

> *"Emissions of PM10 and SO_X have decreased in the studied period of 2007 to 2015, while GVA has fluctuated significantly with an overall strong decrease, decreasing more than sevenfold from a peak in 2011 to 2015. The number of installations reported to be permitted remained constant from 2011 to 2015 in the sector. Emissions of NOX remained relatively constant throughout the period despite the fluctuations in GVA. In the case of emissions of NMVOC, Ni and Zn, the energy - refining sector is responsible for a large share of emissions relative to industry as a whole. NMVOC emissions declined from 2007-2008 and increased in subsequent years, with an overall decreasing trend from 2000 to 2015. […] Emissions of all heavy metals decreased from 2007 to 2015 other than Zn and Hg."*[9]

6. Better freshwater policy thanks to the WFD

Before the WFD, Greece lacked a unified ecological monitoring system. Thanks to the WFD, monitoring became standardized across River Basin Management Plans (RBMPs), ecological and chemical status indicators across inland, coastal, and transitional waters, and a coordinated governance structure required to regularly report to the Commission and pursue the achievement of good ecological status of the country's freshwater ecosystems. The WFD has substantially enhanced Greece's water governance and environmental stewardship. Real gains in water quality, institutional capacity, and public health have been recorded. A recent research study by scientists from the Institute of Inland Waters of the Hellenic Centre for Marine Research and the School of Biology of the University of Thessaloniki confirmed that thanks to the implementation of the WFD "*the long-term decrease of ammonium and nitrite concentrations along with relatively low recent BOD_5 levels, indicate a general improvement of WWTP infrastructure in Greece and the other riparian countries, whereas the improvement of nitrate quality is attributed to the reduction of fertilizers use, and possibly, to the successful application of the Nitrates Directive in certain basins*".[10]

7. Environmental transparency and access to information

EU law has transformed governance in Greece also by guaranteeing public access to environmental information and participation in decision-making. Transparency and access to environmental information was not at all granted in the country, outside of the framework of the Aarhus Convention and the enforcing EU law. This includes access to data on environmental measurements, impact assessments, and public spending on environmental policy. In a country historically plagued by deficits in transparency and accountability, these obligations have been critical in strengthening democratic participation and oversight in environmental decision-making.

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[9] Ricardo Energy & Environment. (2017). *Industrial emissions policy country profile – Greece*. European Commission (ENV.C.4). Prepared under contract 070201/2016/741491/SFRA/ENV.C.4 and published on CIRCABC.
[10] Skoulikidis, N. T., Karaouzas, I., Amaxidis, Y., & Lazaridou, M. (2021). Impact of EU Environmental Policy Implementation on the Quality and Status of Greek Rivers. *Water*, *13*(13), 1858. https://doi.org/10.3390/w13131858