



9/7/2018

RAP/RCha/GRC/1(2018)

## **EUROPEAN SOCIAL CHARTER**

1<sup>st</sup> National Report on the implementation of the European  
Social Charter

submitted by

### **THE GOVERNMENT OF GREECE**

- Follow-up to collective complaints No. 15/2003, 49/2008, 17/2003, 30/2005, 65/2011, 66/2011, 72/2011, 76/2012, 77/2012, 78/2012, 79/2012, 80/2012
- Complementary information on Article 1§3 (Conclusions XXI-1 (2016))

Report registered by the Secretariat on

9 July 2018

**CYCLE 2018**





# 28<sup>th</sup> Greek Report on the European Social Charter

*Simplified Report  
Developments regarding the  
Collective Complaints against Greece  
(2000-2012)  
&  
Article 1§3 ESC*

*Ministry of Labour, Social Security  
& Social Solidarity*

*July 2018*

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## 1. Collective Complaints:

### (a) 15/2003 “European Roma Rights Centre (ERRC) v. Greece” &

### (b) 49/2008 “International Centre for the Legal Protection of Human Rights (INTERIGHTS) v. Greece”

#### **The General Secretariat for ROMA**

On 31 October 2016, pursuant to article 42 of Law 4430/2016 (O.G. A' 205/31.10.2016), the Special Secretariat for ROMA Inclusion was established at the Ministry of Labour, Social Security and Social Solidarity. The Special Secretariat is the government body laying down and implementing the guidelines for the social inclusion of ROMA, in cooperation with other government bodies, notably local self-government agencies of A' and B' degree, on the basis of the principles of proximity and subsidiarity, aiming at the effective inclusion of the target group.

In the context of the National Strategy for ROMA Social Inclusion, the Special Secretariat, in cooperation with the jointly competent ministries and bodies, the local self-government agencies and the Civil Society (Roma collectivities)/ Council of Experts, has developed an operational planning which includes targeted interventions on housing, health, education and employment, placing special emphasis on social care in order to eliminate exclusion, discrimination and negative stereotypes through Community Centers - ROMA Branches.

More specifically, housing aid includes: rent subsidy, temporary and permanent residential interventions in the context of social housing, improved infrastructure and environmental health.

More specifically:

#### **National Strategy for ROMA Social Inclusion – Strategic Objective**

Just as all other European Member States, Greece too, in line with the European Guidelines, has developed through the Special Secretariat a **National Strategy and a National Strategic Planning** for ROMA social inclusion, which includes interventions in four areas: housing, education, health and employment ([IP/13/1226](#)). The National Strategy is specified in the operational plan and includes area-related, spatial and horizontal interventions.

The **Strategic Objective** as defined in the National Strategic Framework for the ROMA is «to lift social exclusion conditions and to create the conditions for the social inclusion of the Roma, who legally reside in Greece».

The above strategic objective is served by three individual general targets:

#### ▪ **Ensuring and guaranteeing “accommodation”**

Living and housing conditions of ROMA in Greece are largely characterized as unsuitable. The aim is the creation of adequate living conditions and targeted residence management in order to achieve sustainable, safe and operational accommodation, organically associated with the urban and social fabric.

#### ▪ **Developing a supportive network of social intervention (in the areas of employment, education, health and social care)**

The second target involves interventions in the following areas:

**Education:** Under constitutional law and in accordance with the requirement for granting the Social Solidarity Income (KEA), i.e., that the children of beneficiaries should complete compulsory education, the focus is put on the enrolment and attendance of all children in schools with a view to curbing school drop-

out and facilitating their access to all grades of education, increasing thus the level of their social, cultural and functional literacy.

**Employment:** A multilayered intervention is designed for quantitative and qualitative boosting of ROMA employment so that by 2020 undeclared work is reduced, accessibility to the labour market is enhanced and entrepreneurship is strengthened especially amongst young ROMA.

**Health – Social Care:** By 2020 the aim is to ensure access to primary healthcare services, develop interventions in preventive medicine and health education and also in social services with a view to accelerating the process of full ROMA integration.

▪ **Developing Social dialogue and consensus through social empowerment and participation of Roma themselves**

The social inclusion of the ROMA is not a usual and easy process. Their social inclusion strategy provides for social consultation and social consensus in order to avoid misinterpretations and distortions. In this context a Committee of Experts is already established with the participation of representatives of ROMA federations. Moreover, emphasis is placed on the participation of direct beneficiaries, which is reflected in the Local Action Plans, since their consent to each proposed intervention is crucial.

**More specifically, with regard to HOUSING:**

Especially in the area of **housing**, the Special Secretariat for ROMA has prepared a presentation of the current situation, which will be updated within the next months, by mapping the settlements and camps and focusing on their typological classification in order to plan appropriate housing interventions. Moreover, based on the findings, the Secretariat has forwarded to all municipalities of the country with ROMA populations, a Model Local Action Plan with spatial and demographic presentation of the situation and the proposed interventions to be implemented by the municipal authorities together with their indicative budgets and implementation schedules, concerning all four operational axes: housing, education, employment, health.

The above mentioned basic typology of ROMA settlements is the following:

**Type 1 category:** «Most degraded areas» - Unacceptable living conditions in huts, shelters lacking basic infrastructure.

**Type 2 category:** «Mixed camps» - houses together with short-term facilities (shanties, tents, containers often used on a permanent basis with rudimentary infrastructure (water and electricity supply, roads), usually in the vicinity of a build-up area.

**Type 3 category:** “Neighborhood” in permanent use, often in disadvantaged areas of the urban fabric (mainly houses, buildings – apartment flats or detached houses and some containers).

<b>TOTAL</b>	Number of settlements	Residence settlements (TYPE 3)	Mixed settlements (TYPE 2)	Shanties (TYPE1)
Number	371	116	181	74
Number of Population	110.007	36.855	63.861	9.291

The **housing assistance** is planned in cooperation with Local Self-Government Agencies, in accordance with the Special Secretariat’s Roadmap and the typological category of camps, and includes the following **three interventions** in addition to the horizontal ones:

- **Rent subsidy**

This provision seems appropriate for families that have been socialized to a degree that ensures their smooth and amicable coexistence with the rest of the population within the urban fabric. The objective is to find residence while ensuring that the beneficiary family will be able to meet all its obligations towards the owner of the residence and the state at the end of the subsidy period.

- **Development of Municipal Social Housing Complexes**

Under the framework of the European Union Charter of Fundamental Rights adopted by our country in 2008 through the ratification of Lisbon Treaty (Law 3671/08), municipalities encompassing within their boundaries Type 1 Roma settlements with inappropriate living quarters, are responsible for providing their citizens with the basic services and goods for decent living. ROMA populations living in settlements at the borderline of extreme deprivation should be immediately relocated or until relocation becomes possible, should enjoy improved living conditions in their settlements (type 1 and type 2 which resemble to type 1 settlements), with a view to the gradual and full inclusion of ROMA population in the wider urban and social fabric. If the area where the settlement is located is appropriate, a new residential fabric may be developed there, directly connected to the wider urban fabric. Moreover, the operation of social housing complexes requires the construction of infrastructure networks (utility networks) at the selected regions of intervention.

- **Development of Municipal Social Housing Complexes - Permanent residential facilities**

The state shall develop social housing complexes within the boundaries of the town plan that will constitute part of the wider urban fabric as they will be developed as new settlements.

More specifically, for Type II settlements the aim is: a) connection to the urban fabric, b) improvement of infrastructure and c) replacement of shanties with settlements while preparing the population for their actual social inclusion through a series of support services.

**Horizontal interventions** include the following:

**A. Improving environmental health**

The immediate improvement of environmental health in all Roma settlements is one of the operational priorities, based on the mapping and in cooperation with the Local Self-Government Agencies of A' and B' degree. Provision is made for the following interventions:

- Water reservoirs and supply of drinking water
- Lighting/ electricity supply
- Disposal of demolition debris and other unnecessary materials
- Placement of waste bins
- Solid waste disposal
- Cleanup of streams and surrounding areas
- Land clearing and planting/ developing green spaces

**B. «Housing and Reintegration»**

The «Housing and Reintegration» programme was extended till 31<sup>st</sup> of December 2017, following an amendment of the Ministry of Labour (Footnote1), from which Roma people may also benefit.

**C. Horizontal Social Support and Care Action- Community Centers/ ROMA Branches**

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1 The amendment was submitted through the draft law «National Mechanism for the Coordination, Monitoring and Evaluation of Social Inclusion and Social Cohesion Policies, Regulations for Social Solidarity and Implementing Provisions relating to Law 4387/2016 (O.G.85 A')» (<http://www.stegasi-epanentaxi.gr>)

Community Centres and ROMA Branches are based on most of 10 common principles for Roma inclusion presented during the first meeting of the platform on 24 April 2009, including, inter alia, intercultural approach, awareness of gender dimension, transfer of evidence-based policies, use of EU instruments, involvement of regional and local authorities, involvement of civil society, active participation of Roma.

Community Centers constitute a new structure established by Law 4368/2016 (O.G.21 A'/21.02.2016) and Joint Ministerial Decision setting out the minimum requirements for their operation (Footnote2). Community Centres, supported or assisted by the Directorate for Social Services at each Local Self-Government Agency, offer “one stop shop” extended services by using an individualized holistic approach and constitute an “umbrella” action for services that reflect and enhance policies that are already being implemented or scheduled, such as implementation of the Social Solidarity Income throughout the country, the program of the Fund for European Aid to the most deprived (FEAD), implementation of active employment policies in cooperation with the OAED and the General Secretariat for Lifelong Learning, etc. The aim is to develop a local reference point that will serve and interconnect citizens with all social programs and services implemented in the region of intervention.

Beneficiaries: Citizens who reside in the region of intervention (priority is given to individuals in poverty, minimum guaranteed income beneficiaries, immigrants, persons with disabilities, etc). Moreover, Roma Branches aim at offering services such as counseling, interconnection and referral to public services, women’s empowerment, facilitating individuals when applying for welfare benefits, supporting individuals who have outstanding judicial, municipal and legal issues, actions in health education and primary health care, services for the promotion to employment.

Regarding care for Roma travelers, it is no longer considered necessary since in the last decades the majority of the population has settled and as already presented above, may benefit from the proposed specific interventions in housing assistance.

Finally, a legislative regulation was adopted in order to facilitate the access of Roma people to housing assistance, by virtue of article 159 of Law 4483/2017 (O.G.107 A' /31.07.2017):

«With a view to ensuring decent living conditions, the temporary relocation of special social groups who live in temporary or informal settlements is allowed, within the meaning of article 13, para11 of Law 3212/2003 (O.G.A'308) and article 34, para.1 of Law 3448/2006 (O.G.A'57), to appropriate and organized areas made available exclusively for this purpose by the State, Local Self-Government Agencies, Public Bodies Corporate, or granted by private entities, following a joint decision of the Ministers of the Interior, of Labour, Social Security and Social Solidarity, of Health, of Environment and Energy and of Finance and Development. The above mentioned joint ministerial decision shall be issued following a proposal of the Committee on Temporary Relocation of Special Social Groups following a request of the Municipality within the territory of which those populations will be relocated. The Committee on Temporary Relocation of Special Social Groups shall be assisted by a support team established by the relevant General or Special Secretary, as appropriate, responsible for the special social group»

Based on this legislative regulation, the relevant Municipality shall file a request for the temporary relocation and shall be responsible either by in-house resources or by outsourcing, under the provisions of Law 4412/2016 (A' 147) [[see ANNEX 1](#)], for:

- a) the preparation and implementation of studies on public infrastructure projects,
- b) the setting up of settlements and their connection with utility networks and

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2 Joint Ministerial Decision Δ23/14435/1135/29.03.2016, O.G. 854 B'/30.03.2016



c) the organization and supervision of temporary relocation sites, in accordance with the operating rules approved by the competent Special or General Secretary, as appropriate, of the Ministry of Labour, Social Security and Social Solidarity.

**Responsibilities of decentralized administrations and municipalities regarding Roma accommodation (footnote3)**

The inclusion of new projects in the programme of housing interventions was finalized in 2009, while the programme of housing loans was finalized in 2012 by virtue of article 38 of Law 4075/2012. The Ministry of the Interior was responsible for the coordination of both programmes (footnote4).

By virtue of the «Kallikratis» programme (Law 3852/2010, O.G. 87 A'/07.06.2010) the responsibility for the housing regularization of Greek Roma populations was assigned to decentralized administrations and municipalities of the country (footnote5).

More specifically,

**Decentralized Administration:**

According to the Kallikratis programme and the redistribution of responsibilities between Regions and Decentralized Administrations (Decentralized Administrations are the successor administrative model of Regions), Decentralized Administrations shall exercise the responsibilities of Regions (Footnote6). These responsibilities include, inter alia, the housing regularization of Roma population and urban legalization (footnote7).

We would like to note that the responsibilities for housing regularization include both the recognition of Greek Roma as final housing assistance beneficiaries and the adoption of relevant decisions defining loan beneficiaries, in accordance with article 4 of JMD 33165/2006 (footnote8), as well as the identification of adequate sites for the temporary relocation of travelers under JMD ΥΑΓ.Π/23641/2003 «Amending regulation A5/696/25.4.83 on the organized settlement of travelers» (O.G. B 973/15.7.2003).

Under article 2 of the above mentioned JMD, the General Secretary for Decentralized Administration is responsible for establishing a special Committee and issuing the relevant decision. In this legal context, provision is made for the identification of public/municipal and private sites for the temporary settlement of travellers following proposals of the relevant municipal council within the boundaries of which travelers will be settled and of the Committee established in order to examine proposed sites, in accordance with the terms and conditions provided for by the above mentioned JMD. Then the General Secretary shall issue the decision on the temporary settlement of travelers.

Regarding urban legalization responsibilities, we would like to note that Decentralized Administrations are now responsible for the implementation of urban planning decisions taken by municipal authorities, following the administrative changes under the Kallikratis programme.

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3 This is the legal framework currently in force, which has been presented before, yet it is hereby presented once again in order to provide better and clearer information.

4 See previous Greek report.

5 It has to be noted that although the regions, as local self-government agencies of B degree, handle Regional Strategies on ROMA and commit resources for actions on ROMA, inter alia, in the context of their responsibilities at local level, in accordance with the principles of transparency, efficiency and effectiveness, they are not exclusively involved in issues relating to the housing regularization of ROMA population.

6 Including the responsibilities of their corresponding collective bodies within the regions, as defined under their establishing law 2503/1997 (O.G.107 A'), and subsequent special laws and relevant regulations, as applicable, with the exception of responsibilities deriving from article 186 of the present law.

7 The implementation of the legal framework for the temporary relocation is closely linked to the demolition and restoration procedures of urban legalization and housing assistance to ROMA.

8 MJD 33165/2006 (O.G. 780 B), as in force (article 280, para46 Law 3852/2010)

### **Municipalities:**

Under the Code of Local Authorities (footnote9), municipal authorities shall manage and regulate all local issues of concern, in accordance with the principles of subsidiarity and proximity, in order to protect, develop and continuously improve the interests and the quality of life of the local community.

The responsibilities of municipalities regarding Roma population housing conditions refer, inter alia, to Social Protection and Solidarity and include the following:

- Support to homeless and financially weak citizens, through the concession of municipal land to them or the provision of financial assistance, means of subsistence and healthcare to citizens facing serious subsistence problems, in accordance with the provisions of the above Code (footnote10).
- Planning and implementation of programmes or participation in programmes and actions on the integration of the Roma population, repatriated Greeks, immigrants and refugees in the social, economic, and cultural life of the local community (footnote11).

Furthermore, in the context of redistribution of responsibilities under «Kallikratis» program, the following are included among the additional responsibilities assigned to municipalities:

- Concession of the use of houses free of charge to individuals who are in need or due to other serious reasons.
- Identification of housing assistance beneficiaries.
- Implementation of:
  - Public health programs organized by the Ministry of Health and Social Solidarity or other Ministries, the cost of which shall be borne directly by the budget of the relevant Ministry,
  - Exceptional public health programmes carried out through exceptional funding,
  - Public health programmes financed by EU resources.

Regarding the above, we would also like to highlight the responsibility of Municipalities, under the above mentioned JMD ΥΑΓ.Π/23641/2003, to improve living conditions of travelers, especially with regard to hygiene. As an example we would like to refer to article 4 of the said JMD which stipulates that «Municipalities shall organize and supervise the operation of approved settlement sites», and to article 3, para3 which states that «organized settlement sites should be equipped with the infrastructure necessary for the healthy living» of settled individuals. This responsibility is in line with the State responsibility exercised at local level, i.e. to ensure compliance with the provisions on temporary relocation sites of traveler population groups (footnote12).

### ***As regards the evictions:***

Regarding evictions, we would like to note that no legislative amendments have occurred since the previous Greek report. However, in accordance with our country's obligations stemming from the Constitution and EU law concerning ROMA citizens, the authorities avoid taking any expulsion measures or using any other means of forced eviction from their places of residence, however illegal or annoying their settlements may be, until a prior relocation site is identified, where they will be able to stay legally and which meets at least the basic standards of decency, while measures are taken to deal with the practical aspects of their relocation.

In any case, Municipalities:

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9 Code of Local Authorities, Law 3463/2006, O.G. 114 A'/ 08.06.2006

10 Para3, section e, part I, article 75, Law 3463/2006 Code of Local Authorities

11 Para5, section e, article 75, part I, Law 3463/2006 Code of Local Authorities

12 In accordance with para10, part II, article 75 of Law 3463/2006, Code of Local Authorities.

- Should ensure the resolution of problems relating to living standards, under article 75 of the Code of Local Authorities (Law 3463/2006) on support to financially weak citizens, in combination with the general provisions on actions concerning disadvantaged groups (Law 3304/2005, article 21, para4Σ). In accordance with JMD B-973/2003, amending regulation A5/696/83 on «the organized relocation of travelers», the responsibilities of Municipalities are further specified with regard to their obligation to improve the living conditions of such groups, in particular hygiene issues. Moreover article 4 of the above JMD stipulates that «Municipalities are responsible for the organization and supervision of approved relocation sites' operation».
- Should take action, in cases where Roma people have clearly occupied private land without the owner's permission, in order to relocate them, within the necessary time frame, to other appropriate places with decent living conditions, in accordance with the terms and procedures laid down in JMD 23461/2003.

## 2. Collective Complaint 17/2003 “World Organisation against Torture (OMCT) v. Greece”

### Recent Developments

The Greek Parliament has ratified the Council of Europe Convention on preventing and combating violence against women and domestic violence, provisions of which are expected to contribute to the protection of children against any corporal punishment.

Under article 8 of Law 3961/2011, a Joint Ministerial Decision (JMD) was adopted on the «Coordination of Actions and Services for Child Protection» (footnote13). In the context of implementing the above decision the 1107 National Child Protection HelpLine was established, which is a service available 24/7 free of charge. This helpline operates at the National Center for Social Solidarity (EKKA), which is a Public Body Corporate supervised by the Ministry of Labour, Social Security and Social Solidarity. This helpline provides immediate information and advice, as well as social and psychological support to children and adolescents on issues they are concerned with or to children who are at risk and their interconnection with the appropriate Child Protection Services. The above mentioned social support action ensures the best interests of children at risk.

In the same context, a Minors' Protection Team composed of social workers was established at every Municipality, in order to resolve problems relating to child protection issues.

Moreover, at national level, the National Center for Social Solidarity (EKKA) is developing an integrated Electronic System for the Interconnection and Interactivity of Welfare Services, entitled «e-pronoia», with a view to coordinating welfare actions, improving the quality and effectiveness of services provided to children, preventing modern social risks that are threatening them and meeting their needs.

A recent development is the one provided by article 14, para5 of Presidential Decree (P.D.) 79/2017 (footnote14) on the «Organisation and operation of kindergartens and primary schools», which is included in the legal framework that already prohibits corporal punishment in all levels of schools (as already detailed in the previous report).

Paragraph 5 provides that the only pedagogical measure allowed to be taken in primary education in order to deal with pupils with severe learning disabilities and/or behavioral problems, is moving the pupil to another class or school under the following conditions: «In order to deal with pupils *with severe learning disabilities and/or behavioral problems*, **the teacher shall cooperate with the Headmaster, the resource**

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13 JMD No49540/2011 (O.G. 877 B'/2011)

14 P.D. 79/2017 (O.G. A' 109/01-08-2017)

**room teacher**, pupils' parents/carers, the School Advisor for General and Special Education and the supporting structures for General and Special Education (KEDDY, EDEAY and the provided structures by the each time existing institutional framework) as well as the competent services and bodies that protect and support children and families. A change in the pupil's environment is a pedagogical measure to control pupil behavior, which can be taken by decision of the school's Teachers Association, if moving the child to another class is proposed or with the consent of the parent/carer, if moving the child to another school is proposed».

Moreover, Ministerial Decision (Footnote15) on: «Enrolments, transfers, attendance and issues relating to the organization of secondary school life» and its interpretative circular (footnote16) provide for the following: «For any deviation from appropriate conduct and from the Framework for the Organisation of School Life and depending on the degree of the deviation, the following may be implemented:

a) *Pedagogical actions to address delinquent behaviour, using softer means than pedagogical measures, (such as apology, compensation for damages, remorse, mediation etc.). Such actions therefore, should be decided upon following discussions and in agreement with the pupil concerned and can be further analyzed in the Framework for the Organisation of School Life, as provided for in article 30, para5.*

b) *Pedagogical measures which are recorded separately in the Book for Actions assuring the School's Smooth Functioning and communicated to parents.*

*It has to be noted that, prior to taking any pedagogical measures, the school (Teachers responsible for each class, student councils, Headmaster, Teachers Association), must exhaust all possibilities of pedagogical intervention and addressing behavioral problems and conflicts that arise within the school community, with a view to helping pupils realize their mistakes and change their attitude/behaviour.”*

Finally, by virtue of a Ministerial Decision (footnote17), the 6<sup>th</sup> of March was established as **Panhellenic School Day against Violence in School**. According to the above mentioned Ministerial decision, on the occasion of a circular issued every year, teachers, pupils and parents of all school units throughout the country exchange views, information, ideas and experiences, are informed and/or propose ways to prevent and address bullying and violence in schools. On that particular day all secondary education schools are required to spend some time organizing actions – discussions - events in order to raise awareness on issues relating to violence and school intimidation.

### **Negative conclusion of the ECSR on child care institutions and structures**

We would like to draw the Committee's attention to article 6§5 of Law 3500/2006, according to which, the provisions referring to personal injury caused by domestic violence, as described in the remaining paragraphs of the same article (article 6 of Law3500/2006) shall apply respectively to workers in social care providers. The law provides for imprisonment depending on the severity and the circumstances under which the action was committed. More specifically, article 6 para5 of Law 3500/2006 on «Domestic violence and other provisions» provides that «*the provisions of the previous paragraphs apply respectively also when the offender is employed by a social care provider, and his/her act is against an individual who receives the services of this provider*». The concept of social care providers includes all institutions providing care and protection to children.

From all the above as well as from the information given in the previous simplified Greek report on the subject (25<sup>th</sup> Report), it follows that corporal punishment of children is fully prohibited in our country,

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15 Ministerial Decision No.10645/ΓΔ4/22-1-2018 (B'120)

16 Circular No.13963/ΓΔ4/26-1-2018 (ΑΔΑ: 7ΥΓ74653ΠΣ-ΓΞ5)

17 Ministerial Decision No. 19792/Γ7/23-2-2012 (ΑΔΑ: Β4ΠΩ9-ΟΟΚ)

including also social care providers, in accordance with the provisions of article 6, para.5 of Law 3500/2006.

### **3. Collective Complaint 30/2005 “Marangopoulos Foundation (MFHR) for Human Rights v. Greece”**

#### **DEVELOPMENTS DURING THE REFERENCE PERIOD**

We would like to remind you that according to the Code of Laws on Health and Safety at Work (K.N.Y.A.E.), which was ratified by article 1 of Law 3850/2010 (O.G.84A´) and in particular by virtue of article 69§4, the enforcement of health and safety provisions in mining and quarrying undertakings «*shall be entrusted to services competent for the inspection of such undertakings*», i.e. the competent units of the **Special Secretariat for the Ministry of Environment and Energy Inspectorate** and, in particular, the **Environmental Inspections and Mines Inspections Departments of Northern and Southern Greece Inspectorate**.

Below you can find data concerning the period 01-01-2016 to date, by area of responsibility:

#### **I. SOUTHERN GREECE INSPECTORATE**

Within the framework of the powers of Mines Inspections Department (TEM), Southern Greece Inspectorate (ENE), Special Secretariat for the Ministry of Environment and Energy Inspectorate, the following developments have taken place with regard to the **improvement of health and safety conditions at the Megalopoli lignite mines, Arcadia Prefecture**, since the submission of the 25<sup>th</sup> National Report (May 2015) and the 27<sup>th</sup> National Report (reference period 01/01/2012 till 31/12/2015) to date:

1. The Service proposed that the area comprising the communities of Tripotamos and Anthochori, Arcadia Prefecture be declared expropriated area for the operation of the Choremio mine. The procedure will be soon completed once the decision is published in the Official Gazette. Thus, care is taken, inter alia, to protect the health and safety of residents living near mine facilities.
2. By virtue of Law 4409/2016 (O.G.136<sup>A</sup>/28.7.2016) provision is made for the following (under article 51):  
**A.** Part of the collected fines, under Laws 1650/86, 1428/84 and 669/77 as in force, as well as Legislative Decree 210/73, «is entered under a special expenditure code (KAE), in the budget of the Ministry of Environment and Energy, to cover expenditure for inspections conducted by the Environment, Construction, Energy and Mines Inspectorate (SEPDEM)». Thus, major costs incurred for preventive inspections by Mines Inspectors can be covered, since, due to the financial crisis and the subsequent expenditure reductions, it was very difficult to conduct such inspections.

#### **➤ Questions of the European Social Rights Committee (ECSR)**

##### **(A) (Article 11§1, §2, §3):**

- The lignite mine at Megalopoli owned by DEI SA occupies an area of 47.659.696, 80 m<sup>2</sup>. It includes four mines (Choremio, Marathousa, Thoknia and Kyparissia), where an estimated 14 million tonnes of lignite are mined annually. There are 4 steam power units with 850MW total capacity, yet 2 of them are in operation of 600MW total capacity. The company staff (employed by the operator and contractors) amounts to 1056 employees (2016 figures).
- Where an infringement committed by the operator is established, the Authority shall forward a form for the operator to give explanations and a second one with additional safety measures to which the operator must respond with evidence documenting the implementation of such measures. In case of a repeat infringement, a new more severe penalty is imposed. More specifically, the fine for a first-time infringement is 16.000€, while in case of a repeat infringement, the fine is doubled (i.e., 32.000€).

**The fines, therefore, imposed by T.E.M. - E.N.E. have a deterrent effect.**

- T.E.M.- E.N.E. carries out preventive inspections without prior notice in order to monitor whether the existing mining and quarrying legislation and mines and quarries regulations have been adhered to and whether the terms and conditions of the undertaking's operating license and approved technical study have been respected. Generally, inspections are carried out by two-person teams consisting of mines inspectors. The goal of the Service is to conduct inspections at large mining undertakings (to which Megalopolis lignite mine is included) at least once a year (taking into account the scope of responsibilities and the staffing of the Service).

**(B) (Article 3§2):**

There are five (5) Mines Inspectors serving T.E.M. - E.N.E. and conducting preventive inspections and site visits. Inspections relate to health and safety issues of workers and nearby residents, industrial accidents and rational exploitation in accordance with approved technical studies and the Regulation on Mining and Quarrying Activities.

According to the records of the Service, the number of accidents that occurred at the DEI lignite mine is the following: 10 in 2015, 15 in 2016 and 3 in 2017. Under Presidential Decree 100/2014, the Service is not competent to perform statistical analysis of accidents that occur at mining-quarrying facilities. This is the responsibility of the Directorate for Raw Materials Policy which is informed on an annual basis.

**(C) (Article 2§4):**

Article 7 of the Regulation on Mining and Quarrying Activities (Ministerial Decision 2233/O.G.1227B/14.6.2011) stipulates that changing rooms, restaurants, offices, lavatories, rest rooms and guard posts must be provided to miners and quarry workers. The same article defines the specifications of such facilities.

Article 21 provides, inter alia, for the limitation of workers exposure to harmful noise levels through appropriate work schedules that include adequate rest periods.

Article 23 provides for the percentage of rest period in relation to the working time, in order to protect workers against thermal stress as well as the conditions under which the interruption of work or transfer are considered mandatory.

Article 26 provides for sufficient rest periods if workers are exposed to vibrations exceeding exposure limit value.

Finally, article 11§ 5 stipulates that «The maximum working time of each worker within 24 hours is specified by the labour law and is subject to the limitations imposed by the relevant provisions of the current Regulation. In general, continuous employment in two consecutive shifts is prohibited, even with the worker's will. An exception to the above may be made, under the responsibility of the project manager, following a proposal of the responsible supervising engineer, only if there is a need to protect works against imminent danger or to rescue workers or to provide first aid or address risks (fires, floods, explosions, falls, etc.)»

Moreover, the Regulation provides that guidance and advice should be provided to employers by Labour Physicians and Safety Technicians (as consultants) with regard to measures that should be taken for workers' physical and mental health (article 9) and health and safety at work respectively (article 17).

***The Regulation on Mining and Quarrying Activities, therefore, provides for adequate periods of rest for workers in mining projects (hence in lignite mining projects too).***

## **II. NORTHERN GREECE INSPECTORATE**

- In the abovementioned time period, the Environmental Inspections Department of the Northern Greece Inspectorate (TEP-EBE), conducted environmental inspections at the Agios Dimitrios Steam Power Plant (SPP) and the Southern Field Lignite Mine of the Lignite Center of Western Macedonia (LKDM), in

the course of preliminary examination conducted for hexavalent chromium in drinking water at Akriini, Agios Dimitrios, Riaki and Koilada Municipalities of Kozani Prefecture. It also conducted environmental inspections at a private lignite mine that supplies a Steam Power Plant owned by the DEI.

Inspections are in progress in accordance with the procedure provided for in article 9 of Law 2947/2001. Environmental Inspectors, in their capacity as special investigating officials, are conducting preliminary examination, following an order of the competent Public Prosecutor, concerning the landslide at Amindaio lignite mine on the 10<sup>th</sup> of June 2017.

- With regard to environmental inspections and sanctions imposed, the following apply, in accordance with the institutional framework of our country:

[1]. In case an infringement of the environmental law and of approved environmental conditions is found, environmental inspectors, under the procedures of article 9, Law 2947/2001, after ascertaining the infringements, propose to the Minister of Environment the imposition of administrative sanctions, in accordance with the procedure under article 21 of Law 4014/2011. Fines are set on the basis of the following criteria laid down in Law 1650/1986, as amended by Law 3010/2002 and now in force by virtue of article 21 of Law 4014/2011: gravity of the infringement, frequency, recurrence, exceedance level of limit values. The same article defines the maximum fine amount that can be imposed, which may not exceed 2.000.000 euros.

Furthermore, it has to be noted that the Ministerial Decision under article 20§17.d of Law 4014/2011 is at the final processing stage. This Decision shall define the calculation method for fines imposed under article 21 of the same Law, hence uniform sanctions will be imposed at national level in order to ensure equality of treatment for all inspected undertakings.

[2]. In article 20 of Law 4014/2011 on environmental licensing of projects and activities, provision is made for a series of measures in order to conduct environmental inspections in the most effective way.

More specifically:

- Environmental inspections are conducted either on the basis of annual programming or following an order of the Public Prosecutor or within the framework of looking into/ investigating complaints. In order to conduct inspections in the most coordinated manner and to make full use of the resources available in the competent inspection units, under article 20 of Law 4014/2011, the Environment, Construction, Energy and Mines Inspectorate (SEPDEM) has prepared a Plan of Environmental Inspections (including lignite mines throughout the country). The plan is at its final processing stage and its implementation is expected to start immediately.

- In article 20§10.c of Law 4014/2011 provision is made for the conduct of re-inspections within six months if serious infringements are detected during environmental inspections. Moreover, para.15 of the same article stipulates that, if during inspections infringements are detected that caused or may cause environmental damage or are likely to cause widespread ecological disruption, Environmental Inspectors and other competent inspection units shall propose a Compliance Work Plan, which the undertaking is required to implement within a specific timeframe and submit a Compliance Declaration afterwards.

[3]. In order to introduce heavier penalties for environmental infringements that will have a deterrent effect, the following apply:

- Under article 28 of Law 1650/86, as in force, environmental infringements shall also incur criminal sanctions. Therefore, under article 37 of the Criminal Procedure Code, and article 9§4 of Law 2947/2001, the Instrument Establishing an Infringement, as well as the dossier of environmental inspection in general, is forwarded to the relevant Public Prosecutor to make investigations relating to the commission of any offences.

- European Directive 2008/99/EC «*Protection of the Environment through criminal Law*» was transposed into our national law by virtue of Law 4042/2012, Part I. Article 3 of the said law lays down the offences that are punishable under article 7 of the same Law, where penalties are

described. Finally, articles 4, 5 and 6 of the same Law lay down the liability of and sanctions against legal persons.

*It follows, therefore, that the current institutional framework establishes, in the most rigorous manner, the measures that are necessary for a concrete and effective programme of comprehensive environmental inspections, whereas in the cases of environmental infringements, severe administrative and criminal sanctions are stipulated that will also have a deterrent effect.*

- With regard to the number of environmental inspectors, we would like to inform you that six (6) inspectors are now serving at the Environmental Inspections Department (including the Head of the Department).

- We would also like to inform you that Law4014/2011 provides for the development of the Environmental Register (HPM), which will contain all the necessary information on all environmental activities and to which the public will have access.

- With regard to issues falling under the area of competence of the **Mines Inspections Department of (TEM) of Northern Greece Inspectorate (EBE)**, under P.D. 100/2014 and the provisions of the Regulation on Mining and Quarrying Activities (KMLE) (Ministerial Decision Δ7/A/12050/2223, O.G.1227/B/2011), we would like to inform you that it is responsible mainly for inspections and supervisions at mining/quarrying activities, the rational exploitation of the country's natural resources, the health and safety of workers and residents living near mines and quarry sites and elimination of illegal mining and quarrying activities.

In particular, with regard to issues relating to the activities of DEI SA, in the broader area of Western Macedonia, the TEM addresses issues relating to lignite mining which is used in steam power plants (SPP). Engineers serving at the TEM/EBE conduct site visits and inspections at lignite mines of the Westerns Macedonia Lignite Center, in cooperation and jointly with the DEI employees' representatives, taking into account their observations and recommendations, on the enforcement of provisions laid down in the Regulation on Mining and Quarrying Activities. Instructions are given to the undertaking in accordance with the KMLE and sanctions are imposed for infringements of the current Mining Legislation.

As regards inspections at the DEI Western Macedonia Lignite Center, the TEM/EBE engineers, following site visits, found infringements of the Regulation on Mining and Quarrying Activities and imposed financial penalties relating mainly to infringements of the Regulation and to occupational safety.

For example, in 2016, following inspections conducted at the DEI lignite mines, our Service issued eight (8) decisions imposing financial penalties of a total of sixty four thousand euros (€64.000,00) on the DEI SA and other earthworks contractors within the Western Macedonia Lignite Center, while from 01-01-2017 to date, financial penalties of thirty five thousand euros (€35.500,00) have been imposed by virtue of four (4) decisions.

These fines were imposed under the provisions of Legislative Decree 210/1970 (O.G.277/A/5-10-1973) on the Mining Code, of the Regulation on Mining and Quarrying Activities (O.G. 1277/B/14-06-2011) and of Ministerial Decision No.Δ7/A/Φ1/21803/18-12-2001 (O.G.1755/B/31-12-2001) of the Undersecretary of State of the Ministry of Development on the readjustment of financial penalties provided for by Legislative Decree 210/1973, as amended by Law274/1976.

**Reference should also be made to the adoption of Law4512/2018<sup>18</sup> (O.G. A'/5/17-01-2018 and A'/8/23-01-2018), Part B' on the «RESEARCH AND EXPLOITATION OF QUARRY MINERALS AND OTHER**

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<sup>18</sup> This is the current legal framework, which is new (i.e. outside the reference period); it is presented however, with a view to providing better and up-to-date information.



**PROVISIONS» and, in particular, to article 59 [“Supervision, control of the undertaking and sanctions”] introducing multipliers that increase the imposed penalty amounts compared to the previous legislation.**  
 In particular, article 59, para.3 provides for the following:

“Any infringement committed by the operator of the Regulation on Mining and Quarrying Activities (KMLE) and of the orders issued by the Head of the competent Inspection Unit, Special Secretariat for the Ministry of Environment and Energy Inspectorate, as well as any violation of §4 and §6 of article 58 is punishable by a fine of three hundred (300) to twenty thousand (20.000) euros, imposed following a reasoned decision of the Head of the competent Inspection Unit, Special Secretariat for the Ministry of Environment and Energy Inspectorate, who prepares an instrument establishing revenue (list of fines) and forwards it to the Treasury for recovery, in accordance with the provisions of the Public Revenue Recovery Code.

The fine amount per infringement depends on the following three multipliers: 1) gravity of infringement (s), 2) recurrence (e) and 3) number of workers at the site (a).

Mines Inspectors decide upon multiplier (s) based on the following **Table 1:**

Gravity	Multiplier (s)
Low	1
Medium	4
High	9

They decide upon multiplier (e) based on **Table 2:**

Recurrence	Multiplier (e)
First-time infringement	1
Recurrence - once	5
Recurrence more than once	10

**Table 3:**

Number of workers at the site	Multiplier (a)
0-3	1
4-20	3
21-50	6
> 50	9

The number of workers includes the whole staff employed at the site under any working relationship even as subcontractors.

For the determination of the fine (p), infringement points are calculated (mp) as the product of three multipliers:

$$mp = s \cdot e \cdot a$$

Then, depending on the calculated infringement points mp, the fine amount is determined based on the following Table 4:

Scale	Infringement points mp	Fine amount p (€)
1	1 - 5	300 - 1.500

2	6 - 15	1.501 - 3.000
3	16 - 35	3.001 - 5.000
4	36 - 75	5.001 - 8.000
5	76 - 155	8.001 - 12.000
6	156 - 315	12.001 - 16.000
7	> 315	16.001 - 20.000

Furthermore, §9 of the same article provides for the following: «By Decision of the Ministry of Environment and Energy, the scales of Table 4 of §3 and Table 1 of §6 as well as fine amounts provided for in §3 and §6, may be increased up to twofold».

Four (4) Mines engineers (including the Head of the Department), two (2) engineers – specialists in other fields and one (1) administrative employee are serving at the TEM/EBE with a remit that covers a significant part of the Greek territory (**27 Prefectures** in Thrace, Macedonia, Epirus, Thessaly and the islands of North Aegean).

Within the remit of the TEM/EBE, the following mining and quarrying activities are carried out only at the Prefectures of Western, Central and Eastern Macedonia - Thrace:

- 80% of quarrying activity nationwide (the marble quarries of Drama, Kavala, Thasos, etc, aggregates and industrial minerals quarries) employing approximately 3.000 workers
- 80% of lignite mining nationwide (WESTERN MACEDONIA lignite center owned by the DEI), employing approximately 5.000 workers
- Mining activity of ELLINIKOS CHRISOS SA (HELLAS GOLD) in Chalkidiki, employing approximately 2.000 workers, with which two of our Service's engineers have been exclusively dealing for a long time.
- Private lignite mines in Western Macedonia (METE, LARKO, ACHLADA LIGNITE MINES), employing approximately 500 workers
- LARKO nickel mines at Kastoria, employing approximately 250 workers
- Mining activity of «ELLINIKI LEFKOLITHI» (GRECIAN MAGNESITE) in Chalkidiki, employing approximately 600 workers.
- Exploitation of geothermal potential in the areas of Nigrita and Sidirocastro of Serres, Nea Apollonia and Nymfopetra of Thessalonica, Eratini of Kavala, Nea Kessani and Erasmio of Xanthi, Aristino of Evros, Polichnitos of Lesbos, etc.

## ➤ Updated information on the DEI

### 1.Occupational Health and Safety

#### 1.1 Record of occupational accidents

The DEI records all occupational accidents and releases annual statistics that are communicated to all units and to workers' representatives. It has to be noted that accidents also include those relating to subcontractors.

DEI Health and Safety data	2014	2015	2016
Total number of accidents <sup>1a</sup>	64	56	60
Total number of fatal accidents <sup>1b</sup>	3	0	1

DEI Health and Safety data	2014	2015	2016
Rate of fatal accidents <sup>2</sup>	2,33	0	0,81
Frequency rate of accidents <sup>3</sup>	2,64	2,95	2,77
Total number of days lost due to accidents	19.970	1.934	7.576
Accident severity rate <sup>4</sup>	0,82	0,10	0,35
Total number of days lost <sup>5</sup>	55.464	63.930	<... >
Absence rate <sup>5</sup>	2,14%	2,48%	

<sup>1a</sup> It includes all cases of accidents occurred at work relating to the permanent and seasonal/temporary personnel and leading to an absence of more than three (3) calendar days. Commuting accidents during the journey between home and the workplace as well as accidents having only a medical origin are not included since they are processed separately.

<sup>1b</sup> Total number of fatal accidents in accordance with the European statistics on accidents at work (ESAW) Methodology - 2001 edition.

<sup>2</sup> Calculation method: Number of fatal accidents per 10.000 workers according to ESAW.

<sup>3</sup> The methodology for frequency rates is the European statistics on accidents at work (ESAW) - Methodology - 2001 edition, which is also used by the European Agency for Health and Safety at Work EU - OSHA and EURELECTRIC. Calculation method: Number of accidents per 10<sup>6</sup> hours of exposure to risk.

<sup>4</sup> The methodology for severity rates is the European statistics on accidents at work (ESAW) - Methodology - 2001 edition which is also used by the European Agency for Health and Safety at Work EU - OSHA and EURELECTRIC. Calculation method: Number of days of absence from work (calendar days) per 10<sup>3</sup> hours of exposure to risk.

<sup>5</sup> The total number of days of absence and the respective absence rate refer to absence from work recorded as sickness absence and sick leave.

Accidents	2014		2015		2016	
	Number of non-fatal accidents	Number of fatal accidents	Number of non-fatal accidents	Number of fatal accidents	Number of non-fatal accidents	Number of fatal accidents
Accidents of workers employed by DEI	61	3	56	0	59	1
Accidents of workers employed by contractors <sup>1</sup>	22	1	16	3	1	0
Accidents of third parties <sup>2</sup>	1	1	0	0	1	0

<sup>1</sup> There is a significant possibility that a number of accidents may have gone undetected because the contractor may have not notified the authorities and DEI accordingly.

<sup>2</sup> Such accidents usually refer to electrocution and road accidents. Electrocutions are caused by an unintentional direct contact with live power lines, either during construction and erection works (buildings, billboards, etc.) or when lifting up the masts of hoisting equipment. They occur mostly due to safe distance rule violation or even due to the fact that third parties do not request power cuts in specific network sectors.

In 2016, a fatal accident occurred involving a DEI worker during remedial works carried out because of defect at a substation's electrical installation for a conveyor belt operation at Amyndeo Mine. The DEI established an Inquiry Commission while the case has been referred to the Public Prosecutor's Office.

Moreover, the following measures have been taken:

- A meeting between officials has taken place on how to manage electrical hazards in mines.
- It was decided to publish a manual on electrical safe work practices in mines.
- Inspections have been and are still being carried out on the proper use of personal protective equipment.

Out of 59 non fatal industrial accidents:

- 1 occurred at a customer service office at the Region of Fokida.
- 49 occurred during lignite production related activities. 38 of them occurred in the geographical area of Western Macedonia (33 at the Region of Kozani and 5 at the Region of Florina) and 11 occurred in the area of Megalopoli.
- 9 occurred during activities relating to the production of non-lignite materials (1 in Attica, 5 in Crete and 3 in islands of the Aegean).

DEI Units	2014				2015				2016			
	Number of accidents	Accident frequency rate	Days lost due to accidents	Accident severity rate	Number of accidents	Accident frequency rate	Days lost due to accidents	Accident severity rate	Number of accidents	Accident frequency rate	Days lost due to accidents	Accident severity rate
Mines Business Unit	43	4,90	19.417	2,21	37	5,16	1.202	0,17	41	5,15	7.020	0,88
Generation Business Unit	19	1,71	451	0,04	15	1,94	610	0,08	18	1,92	534	0,06
Supply Business Unit	0	0	0	0	0	0	0	0	1	0,54	22	0,01
Other Units / Head Offices	2	0,81	102	0,04	4	1,79	122	0,05	0	0,00	0	0,00

Despite the fact that the absolute number of accidents increased (60 accidents in 2016 compared to 56 in 2015), the accident frequency rate reduced due to the increase in the total hours of actual work (which coincide with the hours of risk exposure).

With regard to accident severity rate, it has increased despite the reduction in the number of days lost due to non fatal accidents. This increase is due to the addition of 6.000 days lost due to the fatal accident.

The Occupational Health and Safety Department (DYAE) ensures the documentation and systematic evaluation of DEI's Accident Prevention Policy as well as its effectiveness. In this context, in 2016, 2 reports/ Statistics on Accidents were issued for the year 2015 (one concerning DEI and another one concerning DEDDIE [*Hellenic Electricity Distribution Network Operator SA*]), and 1 report / comments on the characteristics of accidents involving the personnel of Mines and Generation Business Units during 2015. The comments on main accidents were forwarded to all DEI units with a view to preventing similar incidents.

Furthermore, since 2016, the Hellenic Statistical Authority (ELSTAT), as part of its harmonization with the EUROSTAT, keeps record of all accidents that occur in Greece. In this context, it forwarded a letter requiring DEI to provide information on accidents.

DEI forwarded an electronic file containing the accidents database; including accidents that occurred in mines [see ANNEX 2]. Information on occupational accidents throughout the country can be found at the official ELSTAT website: <http://www.statistics.gr/en/statistics/-/publication/SHE03/>.

### **1.2 Preventive Medical Check Up**

Annual Preventive Medical Check-Ups are continuing for the DEI personnel at Lignite Centers and SPPs at a rate of 25% of the personnel. No occupational diseases have been identified by these check-ups.

Moreover, in 2016, the Social Workers Subdivision, Occupational Medicine Division, Occupational Health and Safety Department (DYAE) prepared 134 Social Research Reports (84 requests from DEH and the remaining 50 from DEDDIE [Hellenic Electricity Distribution Network Operator SA]). The activities of the Social Workers Subdivision include the provision of individual and family advice and support to salaried workers, information and their referral to the competent Services, preparation of detailed Social Research Reports as well as Recommendations based on Findings, etc.

Moreover, in 68 cases of workers who were in need of social protection and support, advice and support services were offered, cooperation with their superiors and their family environment, if any, as well as additional professional help. In other cases, guidelines were provided to salaried workers, advice on how to face problems in their personal life and referral to outside centers and services, depending on the problem.

In the context of the Social Workers' programme of visits to the province, in order to identify and resolve any problems, pilot visits were made to the DEI and DEDDIE units at Nafpaktos, Korinthos, Patra and Kalamata.

### **1.3 Certified Systems to OHSAS 18001:2007 standard**

In order to ensure health and safety at work, over the last years the DEI has been implementing a programme for the development and certification of Health and Safety at Work Management Systems, in accordance with OHSAS 18001:2007 standard at thermal power stations. So far, all the Lignite Center SPPs have been certified; also, the Megalopoli Mine and the Main Field Mine in Western Macedonia was certified in 2016. In the context of certification, internal and external inspections (by certification bodies) are carried out.

### **1.4 Information campaigns**

The DEI has committed itself to the implementation of relevant Greek Law provisions on workers' health and safety, and to the immediate harmonization with any recent European Directive in this area. To this end, in 2016, DYAE developed a platform that will provide legal information to Units and will assess their legal compliance.

In fall 2016, a working meeting was held on: «Intervention of Mines Business Unit concerning electrical accidents». In this meeting a number of actions were decided upon for the fourth quarter of 2016 and in 2017, which are in progress.

### **1.5 Important distinctions awarded to the DEI for health and safety**

In 2016, the DEI won 1 gold and 1 silver award at the Health & Safety Awards for its actions on Health and Safety in Western Macedonia.

## **➤ Health Education**

As regards Health Education in primary and secondary schools in our country, all the information given in the 27<sup>th</sup> Report on the Implementation of the ESC, article 11§2 still applies.

Furthermore, we would like to inform you of the following:

❖ In Primary Education, environmental and health education is provided, in accordance with the Curricula and the Interdisciplinary Unified Framework Curricula for Primary Education, to school students in courses or chapters of various teaching subjects through an interdisciplinary approach and by means of environmental health education programmes.

Environmental education activities and approaches are organized during the flexible zone or during the entire curriculum.

❖ In Secondary Education, issues relating to environmental health are taught in various subjects.

For example:

- Home Economics, High School A' & B' classes
- Chemistry, High School B' class
- Biology, High School B' & C' classes
- Social and Political Education, High School C' class
- Chemistry, Lyceum A' class
- Geology & Natural Resources Management, Lyceum A' class
- Chemistry, General Lyceum B' class
- Biology, General Lyceum C' class

Moreover, pupils are made aware of environmental health through Environmental and Health Education programmes implemented at schools as well as through research projects carried out at General Lyceums.

❖ Regarding Vocational Lyceums (EPAL) throughout the country, the following apply:

A. The curriculum is common for all pupils attending class A of Vocational Lyceums (EPAL) where general training, guidance and elective courses are taught, such as the course on «**Vocational Guidance in School – Health and Safety at work**». The main **purpose of this course** is to *provide pupils with the necessary information, knowledge and skills that will enable them to gradually integrate into a dynamically changing labour market and enjoy an active social life*. Highlighting principles, conditions and practices that will safeguard individual health and safety at work is among the individual targets of this course. To this end, part B' of two subject areas of this course is dedicated to **Health and Safety at work** and the following subjects are taught:

- ↪ Structural elements of the work environment (natural environment, material environment, architecture and ergonomics, social environment, etc)
- ↪ The concept of health and safety at work
- ↪ Mechanisms to improve working conditions (committees, labour physician, safety technician, current institutional framework)
- ↪ Personal protective equipment and their use
- ↪ Occupational hazards and prevention
- ↪ Industrial accidents – Occupational diseases
- ↪ Damaging agents and how to minimize them
- ↪ Employee – Employer – State obligations to ensure workers' health and safety
- ↪ Special issues relating to Health and Safety for each one of the nine (9) fields of study in Vocational Lyceums.

Below you can find in detail the subjects covered by **Health and Safety at work (Part B’)**:

Guidance Course of A' class of Day Vocational Lyceums « Health and Safety at Work»	
Part B	HEALTH AND SAFETY AT WORK
<p><b>Introduction to health and safety at work</b>  <b>The concept of occupational hazard</b>  <b>The health and safety management system in an undertaking</b>  <b>Special health and safety issues relating to the following fields:</b></p> <ul style="list-style-type: none"> <li>[1]. <b>Agriculture, Food and Environment</b></li> <li>[2]. <b>Management and Economy</b></li> <li>[3]. <b>Structural Works, Structured Environment and Architectural design</b></li> <li>[4]. <b>Applied Arts</b></li> <li>[5]. <b>Electrical Engineering, Electronics and Automation</b></li> <li>[6]. <b>Mechanical Engineering</b></li> <li>[7]. <b>Information Technology</b></li> <li>[8]. <b>Health and Welfare</b></li> <li>[9]. <b>Maritime Occupations</b></li> </ul>	

**B.** Students attending the A Class of Day and Evening Vocational Lyceums may attend the “Health Education” elective course, which includes topics on cancer, exposure to toxic substances and sunlight and environmental pollution.

**C.** As of the 2016-17 school year, the guidance course «**Creative Activities Zone**» has been included in the timetable of the A class of Day and Evening Vocational Lyceums. This is an educational activity zone during which schools will develop educational activities in cooperation with and depending on the needs and interests of both students and the local community. Issues relating to Environmental Education and Health Education taken from the national repository “Fotodendro” can be included in such activities.

**D.** At the B’class of Vocational Lyceums, the curriculum is divided into nine (9) fields of study while general training and technical-vocational courses are taught for each field (theory and workshops). Class B’ students who have selected the “Structural Works, Structured Environment and Architectural Design” field shall attend the “Structured Environment and Urban Planning Applications” course for 2 hours/week, and thus, be are given the opportunity to:

- ↪ Analyze issues relating to the ecosystem, the rational use of natural resources in constructions, basic environmental protection legislation on construction,
- ↪ Analyze issues relating to pollution, classify sources of pollution and evaluate the damage caused,
- ↪ Classify waste and justify the selected treatment method,
- ↪ Describe waste management and recycling methods for various types of wastes,
- ↪ Name and analyze environmental impacts caused by specific constructions as well as environmental protection methods.

#### **4. Collective Complaint 65/2001 “General federation of employees of the National Electric Power Corporation (GENOP-DEI) / Confederation of the Greek Civil Servants’ Trade Unions (ADEDY) v. Greece”**

We refer to the previous Greek Report (25<sup>th</sup> (simplified) Report).

Please note that, since its submission in May 2015 and up to date, there have been no legislative or other developments regarding the issue under examination (i.e. *a reasonable period of notice before the termination of employment*).



## **5. Collective Complaint 66/2011 “General federation of employees of the National Electric Power Corporation (GENOP-DEI) / Confederation of the Greek Civil Servants’ Trade Unions (ADEDY) v. Greece”**

A series of actions have been undertaken in the recent years with a view to enhancing the EEC’s connection with the labour market and the economy, improving the quality of social partners’ involvement, informing young people on vocational training opportunities, improving the quality and closer connection of the initial with the ongoing vocational training. To this end, these actions take account of labour market needs increasing thus employment rates, combating youth unemployment and retain competitiveness of enterprises with a view to achieving sustainable growth.

In particular:

In April 2016, the Ministry of Education in cooperation with the Ministry of Labour and the OAED, prepared the National Strategic Framework in order to upgrade vocational education and training. This framework includes strategic orientations, priority axes, and actions that will redesign and enhance Vocational Education, Training and Apprenticeship. The above mentioned strategic framework is available on the website of the Ministry of Education<sup>19</sup> and has been submitted to the European Commission.

Moreover, Joint Ministerial Decision (JMD) No. 26385/2017 of the Ministers of Labour, Social Security and Social Solidarity, of Education, Research and Religious Affairs, of Economy and Development and of Finance, entitled «Apprenticeship Quality Framework», ensures quality in Apprenticeship by defining the powers of parties involved, guaranteeing the rights of apprentices and defining the obligations of participating enterprises. Moreover, the development of a framework and the initiation of synergies is sought with relevant bodies and social partners on EEC issues through actions designed at regional and sectoral level, boosting thus regional growth by improving the match between labour supply and demand for specialties in which regional and local societies have competitive and development advantages.

More specifically, apprenticeship is an educational system where learning time alternates between a workplace and an educational institution. Learners gain work experience in real working conditions facilitating thus their integration into the labour market. Apprenticeship is based on a curriculum which includes areas of learning in the workplace and at the educational institution. The employer assumes the obligation to provide the apprentice training in the workplace, based on the specific curriculum, which in combination with the one taught at the educational institution, leads to certification of knowledge and skills acquired by the apprentice and subsequently to a specific area of specialization. Apprenticeship prepares young people for the labour market and facilitates their transition from education to the labour market. Apprentices gain work experience in real working conditions as well as abilities and skills in the area of specialization of their choice by working together with professionals in the specific industry. Moreover, apprenticeship is an interesting option for those who do not wish to attend tertiary education.

Apprenticeships are made available by the following bodies: a) OAED Vocational Schools where attendance lasts for 2 years (4 semesters), b) the Post-Lyceum Year of Apprenticeship, which falls within the area of competence of the Ministry of Education, is optional and lasts for 9 months and c) Vocational Training Institutes (IEK) which fall under the jurisdiction of the General Secretariat for Lifelong Learning where attendance lasts for 960 hours in total (6 months).

Graduates of Vocational Lyceum may enroll at the Post-Lyceum Year of Apprenticeship provided that they meet the following conditions cumulatively: a) are holders of a baccalaureate and degree of

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<sup>19</sup><https://www.minedu.gov.gr/publications/docs2016>

secondary course of study offered by a Vocational Lyceum b) are not in employment, education and training and c) are not more than 24 years of age.

Holders at least of a certificate of the first class of a Lyceum, aged up to 23 who are not in employment, education and training may enroll at the OAED Vocational Schools. Admission of candidates to Vocational Schools is subject to a points-based system depending on specific criteria (mark of the diploma or degree, social and financial criteria).

Students of Vocational Training Institutes, following an invitation, can file an application for participation in an Apprenticeship program at the educational institution where the apprenticeship concerning their area of specialization shall take place.

Following an assessment undertaken by apprentices, apprenticeships lead to a recognized degree certifying the successful completion of their studies. Apprentices who complete Apprenticeship training are awarded a certificate of vocational qualifications in accordance with the current legislation (EOPPEP).

Apprentices (from either the Post-Lyceum Year of Apprenticeship or OAED Vocational Schools or Vocational Training Institutes) are paid 75% of the statutory minimum wage, i.e., 17,12€ per day of training carried out in the workplace. From the first day of training and throughout their apprenticeship, apprentices<sup>20</sup> are insured with the Unified Social Security Institution for sickness provisions both in kind and in cash, while their service as apprentices is pensionable. Apprentices are entitled to paid leave, educational leave in order to take exams and in case of absence due to sickness, the provisions of articles 657 - 658 of the Civil Code apply. Apprentices are entitled to counselling before, during and after their apprenticeship at the enterprise by competent units of the Ministry of Education and/or the OAED, on condition that relevant programs are offered.

Finally, restrictions apply with regard to the number of apprentices per employer in order to avoid substituting permanent employees for apprentices. More specifically, the maximum number of apprentices per employer depends on the number of workers according to the annual staff table submitted to the Labour Inspectorate.

In particular:

1. individual enterprises without employees may accept one (1) apprentice.
2. Employers with 1-10 workers may offer apprenticeship posts corresponding to 25% of their staff bound by dependent working relationship (1-2 persons). In particular, for employers with 1-5 workers the resulting quota is rounded down to the nearest whole number while for employers with 6-10 workers the resulting quota is rounded up to the nearest whole number.
3. Employers with 10 or more workers may accept apprentices corresponding to 17% of their staff bound by a dependent working relationship and in any case up to 40 persons maximum, if the resulting quota is higher than this number.
4. Employers with more than 250 workers may accept apprentices corresponding to 17% of their staff bound by a dependent working relationship per branch and in any case up to 40 persons maximum, if the resulting quota is higher than this number.

It should be noted that the bill submitted by the Ministry of Labour, Social Security and Solidarity to the Greek Parliament, entitled **"Insurance and pension arrangements - Tackling undeclared work - Strengthening worker protection - Guardianship of unaccompanied minors and other provisions"** (date of submission:26-06-2018), introduces a new general obligation -as regards internship and apprenticeship in enterprises- to register students who practice internships or apprenticeships in any enterprise in the

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<sup>20</sup> Who come from both the Post-Lyceum Year of Apprenticeship or OAED Vocational Schools or Vocational Training Institutes

information system "ERGANI". This makes now possible the registration of their total number, as well as the registration of the total number of the enterprises that employ them, in order to be able to check compliance with the maximum limits provided by the law.

*Especially for apprentices, students and college students who are trainees or apprentices in tourist enterprises, it is stipulated that their total number may not exceed the 17% of the total number of employees per enterprise, with a maximum of 40 people per enterprise.*

## 6. Collective Complaint 72/2011 “International Federation for Human Rights v. Greece”

### ***As regards the implementation of environmental liability in the region of Asopos***

With regard to the implementation of environmental liability in order to remedy the environmental damage in the region of Asopos, we would like to inform you of the following:

The Coordination Office for the Remediation of Environmental Damage (SYGAPEZ) has been established as the competent supervising Authority at central level to implement Directive 2004/35/EC on environmental liability, based on the principle «*the polluter pays*». Moreover, at Decentralized Administration level, the relevant competence lies with the Regional Committees for the Remediation of Environmental Damage (PEAPZ) established in all Regions throughout the country, by decision of the relevant General Secretary of Decentralized Administration. They have a scientific and advisory role in determining preventive measures and/or remedial projects.

With regard to the implementation of environmental liability in Asopos River Basin, the Decentralized Administrations of Thessaly–Sterea Ellada (Central Greece) and Attica together with the SYGAPEZ have placed a total of nine (9) cases under environmental liability status in the said area (within or at the boundaries of Asopos River basin). Another case is under investigation.

More specifically:

#### **Geographically, these nine (9) documented cases are distributed as follows:**

Seven (7) are located at the Region of Sterea Ellada and two (2) at the Region of Attica. Another case under investigation is also located at the Region of Sterea Ellada.

#### **With regard to the type of damage recorded:**

Six (6) cases refer to damage caused by uncontrolled disposal of hazardous industrial waste. Two (2) of these cases refer to uncontrolled discharge of waste of unknown origin (disposal of waste by unidentified operators).

One (1) case refers to damage caused due to dumping of non-hazardous and potentially hazardous waste in an Uncontrolled Waste Disposal Area.

Two (2) cases refer to identified pollution of underground aquifers by hexavalent chromium and organic substances, respectively, while the conduct of inspections and samplings is decided upon to identify the source of pollution.

#### **Regarding the implementation of remedial projects:**

In three (3) out of nine (9) documented cases, rehabilitation works have been completed and waste has been removed.

In particular, regarding pollution of underground aquifer by hexavalent chromium, following measurements performed at the plot of land of an aluminum rolls production plant in the region of Asopos, Decisions were adopted providing the following:

- (a) pilot remedial action for the underground aquifer,
- (b) monitoring program for existing and new water exploration drilling projects,
- (c) investigations in order to identify the source of pollution and
- (d) immediate removal of such source once identified.

The cost of the above mentioned actions shall be borne by the responsible operator while their implementation is well under way and is monitored by the Environmental Inspectors of the SYGAPEZ, in cooperation with a specialized scientific advisor (the Technical University of Crete). More specifically, regarding the progress in the implementation of these measures as defined in the above mentioned relevant decisions, we would like to note the following:

- Phase one of the pilot pump and treat method with the use of tracers was completed.
- Part one of phase two has been completed, i.e., pilot in situ method by using controlled hydraulic gradient.
- Part two of phase two has started, i.e., injection of a mixture of chemical reagents (ferrous sulfate heptahydrate, molasses and emulsified vegetable oil).
- Underground water monitoring for existing water well drills is conducted at regular intervals.
- Investigations are carried out by means of drilling and sampling in order to identify the source of pollution within the plot where the undertaking is located as well as in adjacent plots.

Moreover, given the fact that by virtue of article 51, para5 of Law 4409/2016, SYGAPEZ's powers were strengthened because of the Environmental Inspectors' duties, the Environmental Inspectorate is in constant cooperation with the Environmental Inspection Department (TEP) of Southern Greece Inspectorate, Ministry of Environment and Energy, as well as with other local units. Thus, with the assistance of these units and by means of environmental inspections conducted in Asopos river basin, responsible undertakings are held environmentally liable, while sanctions are imposed for non-compliance with the preventive / remedial measures laid down in article 17 of P.D. 148/2009.

#### ***Environmental Inspections in the area of Asopos River***

The following table presents inspections conducted and fines imposed by Environmental Inspectors from 2004 up to 2015.

<b>INSPECTIONS CONDUCTED BY THE ENVIRONMENTAL INSPECTORATE, PER YEAR IN THE BROADER AREA OF ASOPOS RIVER</b>				
	Inspections	Reinspections	Infringements established	Fines imposed
2004	13	-	10	207.500 €
2005	4	-	3	71.100 €
2006	19	1	14	332.480 €
2007	52	10	49	2.374.000 €
2008	43	19	41	1.151.415 €
2009	32	6	12	124.450 €
2010	31	-	17	906.300 €
2011	30	15	27	1.100.000 €
2012	25	6	12	639.040 €
2013	11	-	2	70.200 €
2014	4	1	3	184.400 €
2015	5	-	3	193.950€
<b>TOTAL</b>	<b>269</b>	<b>58</b>	<b>193</b>	<b>7.354.835 €</b>

Furthermore, with regard to the organizational structure and in particular the establishment of the Department for Sterea Ellada of Special Environmental Inspectorate (EYEP), we would like to note that as of October 2014, the new Organisation Chart (P.D. 100/2014) of the Ministry of Environment and Energy

has been put into effect. More specifically, by virtue of P.D. 100/2014, the Inspectorate for Environment, Construction, Energy and Mines was established, together with the Inspectorates for Northern and Southern Greece (Directorate level). The Oinofyta Office<sup>21</sup>, which falls under the jurisdiction of the Inspectorate for Southern Greece, is responsible for a) inspecting and monitoring the implementation of environmental conditions and provisions relating to protection of the environment in projects and activities that fall under its territorial jurisdiction, b) proposing the imposition of sanctions in the event of breach of such provisions c) addressing any other issue relating to environmental inspections in projects and activities and d) performing any other duties explicitly conferred upon environmental inspectors by the provisions of the legislation in force.

#### ***As regards actions of the Special Secretariat for Water (Ministry of Environment and Energy)***

The Special Secretariat for Water (EGY), in compliance with Directive 2000/60/EC, has prepared the **River Basin Management Plan for the Water District, Eastern Sterea Ellada**<sup>22</sup>. The River Basin Management Plan presents the current situation in terms of meeting water demand both for potable water as well as for irrigation, livestock farming etc and records all planned and new projects/activities relating to the efficient use of water resources. The River Basin Management Plan includes an integrated program for the management of water resources together with relevant measures that will help resolve the problem of water supply. Moreover, the approved **River Basin Management Plan for the Water District, Eastern Sterea Ellada** presents, inter alia, the current situation as regards surface and ground water systems, including Asopos River, and proposes relevant measures, as required, in order to maintain, protect and restore good water quality.

The same issues are also addressed in the *1<sup>st</sup> Revision of the River Basin Management Plans*, the consultation process of which is already underway since 1-6-2016. The draft reports of this *1<sup>st</sup> Revision of the River Basin Management Plans* have already been drawn up and made public at the above mentioned website and include Measures for the Asopos River Basin which are presented below and may be amended after completion of the consultation process:

#### **Industrial waste management in the Asopos River Basin**

By Joint Ministerial Decision No.20488/2010 (O.G. B'749) as in force, the underground disposal of industrial effluents is prohibited in the area. Special conditions are established for their disposal in surface water, while emission limit values have been set both for total as well as for hexavalent chromium and other parameters. In order to comply with the terms and conditions set by the JMD 20488/2010, a Feasibility Study is prepared for the Central Industrial Wastewater Treatment System in the area of Oinofyta-Schimatari. According to the study, the solution proposed by the interested parties (investors, industries, and licensing authority) for the management of wastewater in the area is the construction of two treatment plants, one of which will treat the chemical and the other the organic load. It is suggested that the plants should be installed at the same site so that the outlet of the chemical wastewater treatment plant would be released into the organic wastewater plant for final biological treatment. The environmental damage in the area requires integrated solutions like the proposed one for the implementation of which maturity of the projects is a prerequisite. The implementation stages are the following: Planning - Environmental Licensing – Tendering – Construction - Operation, with a total time frame of 3 - 4 years.

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<sup>21</sup> An officer has already been appointed as Head of the Oinofyta Office, yet, due to the fact that its units are understaffed, Environmental Inspections are conducted in collaboration with the Environmental Inspection Unit of the Inspectorate for Southern Greece and the SYGAPEZ.

<sup>22</sup> Also see our previous report on the issue. The said Plan is posted at the following site.  
<http://wfdver.ypeka.gr/el/home-gr/>.

### **Exploring the possibility of taking immediate actions in order to address pressure in Asopos River Basin from industrial units**

In the context of addressing problems in the Asopos River Basin until the Industrial Wastewater Treatment Plants are constructed in the area of Oinofyta-Schimatari, it is proposed to explore the possibility of undertaking alternative actions of immediate implementation. To this end, proposals are made for alternative sources of water supply to industries as well as the preparation of a technical and economic analysis and feasibility study concerning alternative actions for industrial wastewater management in the Asopos River Basin. The results of this study will be communicated to the competent Water Directorates while approval is needed for the implementation of any actions and/or projects of the said study in accordance with the current legislation. This study should explore the possibility for water supply to industries as well as meeting the additional water supply needs, in case water resources of the Asopos River Basin are found to be insufficient both in terms of quality and quantity.

#### **Demarcation of the Asopos River**

For an area of 10 kilometers along the river's natural bed within the Boeotia Region, the award procedure for the demarcation is under way (approval by the Region's Financial Committee).

#### **Actions to investigate and monitor pollution of the Asopos River**

Implementation of actions 1,2,3 and 4 of Integrated Proposal for Sterea Ellada on Asopos River dated 16<sup>th</sup> of December 2015<sup>23</sup>.

**Action 1:** Establishing a Special Team to Monitor Environmental Quality (KEPPE) with a view to Supervising Inspections, International Tender, Environmental and Health Observatories.

**Action 2:** Calling an International Tender in selected areas for the investigation of pollution in the broader area of Asopos River, where concentrations of pollutants have been found, and the preparation of remediation studies for the said area.

**Action 3:** Staffing and operation of the Environmental Observatory with a view to preparing a study on environmental pollutants in 20 surface and groundwater bodies, 20 surface soil and subsoil samples, 20 diffuse and point sources in the air and 100 agricultural products.

**Action 4:** Finalization of the industrial and environmental register with all undertakings operating in the region. Establishment by law of the Boeotia Environmental Register concerning all industries located in the area of the Asopos River.

Below you can find additional measures included in the Draft Report of the 1<sup>st</sup> Revision of River Basin Management Plans, the implementation of which will make a positive contribution to the Asopos River case.

- Exploring the conditions for the implementation of artificial methods for groundwater aquifer recharge as a means of quantitative enrichment and protection of groundwater aquifers' quality, with priority given to groundwater aquifers in bad condition and dealing with the problem of salinity.
- Developing a National Register of treated wastewater disposal sites.
- Intensification of environmental controls and inspections.
- Developing a register of sources of pollution (emissions, discharges and leakages).

Furthermore, the **National Network for Monitoring the qualitative and quantitative status of surface water and groundwater**<sup>24</sup> is already established and operates effectively, including sampling sites

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<sup>23</sup> Ref No.: BZ157ΛH-ΨΨ8

<sup>24</sup> JMD 140384/2011, O.G. B' 2017

**for surface and groundwater in the Asopos River Basin**, enabling thus the establishment of a coherent and comprehensive overview of water bodies' qualitative and quantitative status.

The network comprises:

- Five (5) monitoring stations for surface water bodies, three (3) of which are operational stations. In all 5 stations biological and physico-chemical parameters are monitored while in 2 of them chemical parameters are also monitored (priority substances and certain other pollutants).
- Thirty nine (39) monitoring stations for groundwater aquifers (Thebes - Asopos - Schimatari), which are representative of the pressures on Asopos River Basin from farms, industries and rehabilitated waste disposal sites and near areas where nitrate, chloride and heavy metals concentrations are observed.

Procedures have also been initiated for urban wastewater treatment from the nearby agglomerations of Avlona, Markopoulo Oropou, Nea Palatia, Chalkoutsi, Dilesi and Plaka Dilesi.

Moreover, in order to address the severe problem of Asopos River, in 2011, the elaboration of a relevant research program was assigned, in the context of the LIFE+ instrument, entitled: «*Chromium in Asopos Groundwater System: Remediation Technologies and Measures*» (CHARM). The said project, which was finalized in August 2015, presents detailed identification and assessment of pollution problems in the area and provides pilot technical solutions in order to address the issue of cleaning up water resources as a whole, by proposing adequate remediation measures in the broader area and offering a flexible approach that will easily apply to other basins with similar problems<sup>25</sup>.

With regard to the Programming Agreement signed on 30 July 2014 among the Ministry of Environment (YPEKA) (body proposing the project), the Municipality of Tanagra (body implementing the project) and the EYDAP SA (advisory body) for the project entitled «*Integrated Management of Water Bodies in Asopos River Region*», which includes supply of potable water for urban and industrial use and the environmental recovery of the underground aquifer<sup>26</sup>, we would like to inform you of the following developments:

The action entitled: «STUDIES FOR THE INTEGRATED MANAGEMENT OF WATER BODIES IN ASOPOS RIVER REGION» and MIS 5001203 is included in the Operational Programme "TRANSPORT INFRASTRUCTURE, ENVIRONMENT AND SUSTAINABLE DEVELOPMENT"<sup>27</sup>. It refers to maturity and effective implementation of actions provided for by the project entitled «*Integrated Management of Water Bodies in Asopos River Region*» and proposes the preparation of the following studies:

- Studies for the project «Uninterrupted water supply to urban and industrial areas of Tanagra Municipality»
- Studies for the project «Environmental recovery of the underground aquifer»
- Framework Agreement for the preparation of supporting studies for the project «*Integrated Management of Water Bodies in Asopos River Region*»

With regard to 'Studies for the project «Uninterrupted water supply to urban and industrial areas of Tanagra Municipality», with a budget of 1.554.415,56 euros, the tender process is at the selection stage for the final bidder.

With regard to 'Studies for the project «Environmental recovery of the underground aquifer» with a budget of 622.572,33 euros', the relevant tender dossier has been submitted to the funding body awaiting prior authorization for the initiation of tendering process.

With regard to the 'Framework Agreement for the preparation of supporting studies for the project «*Integrated Management of Water Bodies in Asopos River Region*» with a budget of 248.000,00 euros', which includes work in support of the above mentioned two studies, the relevant tender dossier has been submitted to the funding body awaiting prior authorization for the initiation of tendering process.

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<sup>25</sup> Information about the said program can be found at the <http://www.charm-life.gr/charm/index.php/el/> website.

<sup>26</sup> See our previous report on the issue where detailed reference is made to the said Contract.

<sup>27</sup> By virtue of Decision :οικ.15148/9-12-2016 (amendment 5435/26-4-2017)



## **At local self-government level**

### **Municipality of Tanagra**

The Municipality of Tanagra, in cooperation with the Region of Sterea Ellada, has elaborated a comprehensive plan to address the problem of Asopos River. This plan was presented during a special event which took place at Schimatari on the 6<sup>th</sup> of June 2017,<sup>28</sup> in the presence of the President of the Hellenic Republic, representatives of the government, MPs, representatives of local self-government agencies and other bodies. Moreover, the Municipality's Department for the Environment cooperates with the Coordination Office for the Remediation of Environmental Damage (SYGAPEZ), Ministry of Energy & Climate Change, in the context of JMD 473/24.06.2016 on the «Implementation of a pilot remediation program for the underground aquifer at Oinofyta Boeotia».

With regard to measurements on samples taken from surface waters at Asopos River, we would like to inform you that the latest samples were taken on 2/11/2016 and 8/7/2015. During the first sampling, samples were collected from the river and Mailis pipe, while during the second one, samples were also taken from other pipes that flow into Asopos River. The analyses at both samplings showed high chromium concentration (total and hexavalent) at Mailis pipe, while at the second sampling, no high concentrations in heavy metals were found at the other pipes.

With regard to the quality of potable water, as of 2016, the EYDAP is responsible for water supply to the entire Region of Tanagra Municipality. Constant samplings are carried out and analyses results are posted at the official website of the Municipality, while citizens are informed by any means possible.

Finally, the Municipality's relevant Services constantly monitor the state of the environment in the broader area of Asopos River, placing emphasis on the liquid and solid waste management methods, and take actions as appropriate in order to address the problems that arise.

### **Region of Sterea Ellada**

At the initiative of its Governor, the Region of Sterea Ellada has undertaken special action and proposed a package of measures required for a radical and comprehensive approach to the problem of pollution in the Asopos River Basin, including, inter alia, far-reaching inspections in order to reveal pollution sources and pollutants, measures for the eradication of causes of pollution and remediation of the area, creation of an Industrial Park aiming at the urban and spatial regulation and remediation of the region where the third largest haphazard concentration of industries throughout the country can be found, development of Health and Environmental Observatories, demarcation of Asopos River, etc.

Following public consultation, the actions, the program and the appropriations were approved, by virtue of Decision No. 207/2015 of the Regional Council, based on the recommendation of the Governor of Sterea Ellada which includes the following:

- Opening an international tender for the study «Investigating Pollution of the Asopos River and Remediation» at a budget of 829.478, 33 euros, plus VAT and proposes that this study be included in and funded by the Public Investment Program (by SAMPo66).
- Creating an Environmental Observatory at Oinofyta. In particular, it approves: a) the plan, the proposal and the actions taken so far by the Regional Authority, b) the implementation of the action as described in the recommendation and the attached proposals of Democritos National Center for Scientific Research, c) the implementation of the action by signing the draft programming agreement with the above mentioned body for these actions as well as the costs indicated in its proposal and d) an expenditure of 100.652 euros

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<sup>28</sup> <https://www.youtube.com/watch?v=ibDumxZbW6M&feature=youtu.be> comprehensive plan for the Asopos River remediation and development.

that will be covered by Boeotia Region budget's own resources for the year 2016, in accordance with its reform decided upon/proposed during the first meeting of the Regional Council in 2016 and

- Proposal and plan for the procurement and installation of a mechanism for the elimination of pollution in Asopos River at a budget of 60.000 ευρώ, covered by Boeotia Region budget's own resources for the year 2017, in accordance with its reform decided upon during the first meeting of the Regional Council in 2016, and opening a tender for the implementation of this action.

- Opening a tender for the study «Demarcation and Local Arrangements concerning a 10 kilometers section of the Asopos River within Boetia Prefecture» at a budget of 305.762, 08 and proposes that this study be included in and funded by the Public Investment Program and in particular by SAMPo66.

- The recommendation, proposal, plan, required actions as well as actions taken so far by the Regional Authority concerning the Organisation – Infrastructure – Business Park and authorizes the Regional Authority to proceed with the actions referred to in its recommendation.

-Moreover, with regard to the implementation of the Business Park, it approves the actions taken so far as well as a package of actions and initiatives that include the following:

-The responsibility, the initiative and the cost for the preparation of a complete dossier which will be submitted to the competent authorities and the adoption of a Joint Ministerial Decision (JMD), under article 56, para. 1 and 2 of Law 3982/11, approving the development of a Business Park, under the powers of the Region, in accordance with article 56, paragraph 1 of Law 3982/11. Estimates of expenditure requirements, appropriations and payment procedures will be defined by the competent services of the Region in accordance with the relevant provisions.

-Recruitment of a Technical Advisor who will compile a complete dossier and will monitor the procedure for the adoption of JMD under article 56 of Law 3982/11.

-Conduct of appropriate financial research on the size (extent) and best technical and financial figures concerning the Park, providing also for the possible extension of the Park to adjacent pieces of land beyond the boundaries of the area where industries are informally concentrated on the express condition that they are compatible with land use designations, the integrated environmental remediation of the selected area, the limitation and/or prevention of constructions in the broader area outside of the planning zone and ensuring a financially viable and sustainable proposal for the development of the Oinofyta - Schimatari Business Park with a view to becoming a major organized pole of growth for the local as well as the national economy.

-Approval of the Region's initiatives for the development of partnerships with the Municipality of Tanagra, the Chamber of Boeotia, the Sterea Ellada Federation of Industries, the established undertakings, the owners of plots and the interested investment market with a view to establishing an Implementation Body (Business Park Development Company/EANEP), ensuring the enhanced participation of the Region and the Municipality of Tanagra and finalizing the Business Park development planning through the adoption of JMD under article 47 of Law 3982/11 and the implementation of infrastructure projects approved by this decision.

-Approval of development initiatives, submission of requests, dossiers, etc to any competent or interested body and organization of the public or private sector in Greece and the EU, with a view to finding sources of finance for the investment, increasing the shareholding and operational capability of the Region in the context of EANEP that will be established, selecting the appropriate investment and financial model, aiming mainly at the immediate implementation of the project and also the reduction of the financial burden (financial contribution) that the owners of plots within the Park will be required to bear, under the law, in order to reimburse investment expenses.

-Considering any possibility that would relieve the investment budget by including, financing and implementing projects that fall under the jurisdiction of the Region or by using other sources, for example the Operational Program "Environment and Sustainable Development" (EPERAA).

-Approval for the conduct of research and preparation of appropriate scientific studies, with a view to adopting environmental friendly solutions/projects and processes, preventing any possible institutional destabilization in concluding the Park's planning and development, taking into account the real problems, in accordance with the provisions and guidelines expressed on several occasions in the decisions of the State Council, the instruments of the Ombudsman or in objective scientific texts and studies of undeniable prestige and acceptance.

-Approval of initiatives concerning special measures to enhance the local economy and employment through relevant regulatory commitments of the EANEP towards the Park operator and the established undertakings that the local market in terms of labour, trade and services will be treated preferentially.

Authorization of the Region to proceed to any necessary step for the implementation of all above mentioned actions as well as all actions presented in detail in its recommendation.

- Establishment and installation of the Health Observatory at Oinofyta for four years and in particular: a) the plan, proposal and actions taken so far by the Region, b) the implementation of the action as described in the proposal of the Laboratory of Hygiene, Epidemiology and Medical Statistics of Athens University Medical School, attached to the recommendation and the present decision, c) the implementation of the action by signing the draft programming agreement between the Region of Sterea Ellada and the Laboratory of Hygiene, Epidemiology and Medical Statistics of Athens University Medical School, in accordance with the University's proposal, d) the total cost of the program amounting to 491.826 euros and especially an expenditure of up to 124.078, 17 euros for the first year that will be covered by Boeotia Region budget's own resources for the year 2016, in accordance with its reform decided upon during the first meeting of the Regional Council in 2016.

- Additions to the proposal submitted by the Region of Sterea Ellada in the context of Sterea Ellada draft Spatial Planning consultations, in accordance with the recommendations of the Governor.

- Establishing a permanent Committee of Continual Consultations, the Chairman and members of which are specified in the Recommendations of the Governor. The Governor authorizes the Chairman to establish the Committee by virtue of his decisions and take any necessary action for the committee's functioning.

The above actions are implemented and posted at the website of the Region of Sterea Ellada and of the Health Observatory (<http://pystet.med.uoa.gr/>).

In particular, with regard to the above mentioned actions, the following developments have taken place, which are also presented in the June 2017 issue of the Region entitled: «Environmental and Financial Upgrading of the Asopos River region – Proposal of the Region of Sterea Ellada by means of the Integrated Territorial Investment (ITI) tool»:

As a follow up to the above mentioned Decision of the Regional Council, in January 2016, 1,2 million euros were secured for:

(a) the study on the demarcation of the Asopos River and (b) pollution investigation and remediation, by including those two studies in the Region's Public Investment Program. By decision of the Governor dated 18.01.2017, the permanent Committee of Continual Consultations was established on the remediation of the Asopos River<sup>29</sup>.

On the 8<sup>th</sup> of February 2016, a contract notice was published concerning the preparation of a study entitled « Demarcation and Local Arrangements concerning a 10 kilometers section of the Asopos River within Boetia Prefecture» to be funded by the Region of Sterea Ellada SAMP 066 program. On the 12<sup>th</sup> of February 2016, the Governor forwarded to the Alternate Minister of the Environment a formal proposal on

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<sup>29</sup> Decision No 10525/91/18.01.2017 of the Governor.

the Oinofyta Business Park funding by means of the ITI tool, in the context of the territorial development model for Sterea Ellada Regional Operational program for the period 2014-2020.

In March 2016, two programming agreements were signed by the National Center for Scientific Research “Demokritos” and the Athens University for the creation of Health and Environmental Observatories respectively. In April 2016, cooperation agreements were signed between the Region of Sterea Ellada, the Municipality of Tanagra, the Association of Industries of Central Greece (Sterea Ellada) and ETBA Industrial Regions SA for the development – implementation of Oinofyta Business Park – Remediation and Development. The parties shall work together for the organization, funding and development of the Park, implementing thus a large part of Decision No. 207/2015 of Sterea Ellada Regional Council.

In April 2016, the integrated plan of Sterea Ellada Region concerning the clean-up and development of the area of Asopos River was presented by the Governor to the Special Permanent Committee on Environmental Protection of the Parliament.

From 31 October 2016 to 28 November 2016, an open public consultation was held (ITI Asopos) by means of an electronic platform, e-mails and written proposals.

From 12 to 18 of December 2016, an event entitled “First Week for the Promotion of Health” was held at the Municipality of Tanagra by the Observatory and the Centre for the Promotion of Health.

On the 6<sup>th</sup> of February 2017, the Industrial and Environmental Register of Local Undertakings was posted at the Region’s website.

On the 2<sup>nd</sup> of June 2017, the Oinofyta Industrial area demarcation dossier was submitted to the Alternate Minister of Finance and Development by the Region of Sterea Ellada, the Municipality of Tanagra, the Sterea Ellada Association of Industries and the ETBA BI.PE SA of Piraeus Bank Group and the Hellenic State, as a first step towards the development of the Business Park for the Remediation and Development of the entire region.

#### ***Decentralized Administration of Thessaly – Sterea Ellada***

The Directorate for Environment and Territorial Planning, within the framework of its powers, has adopted decisions on the approval or renewal/amendment of environmental conditions for all operating economic activities falling under the provisions of JMD 20488/2010 (O.G. B’ 749) on the «Establishment of Environmental Quality Standards in Asopos River and Emission Limit Values for Liquid Industrial Wastes in Asopos River Basin», in order to ensure full compliance with this JMD.

Regarding the territorial organization of the area, the above mentioned Service has approved the General Urban Plans of Schimatari<sup>30</sup>, Avlida<sup>31</sup> and Thebes<sup>32</sup> located at Asopos River Basin or the underground aquifers linked to it<sup>33</sup>.

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<sup>30</sup> O.G. 607/ΑΑΠ/2010

<sup>31</sup> O.G. 219/ΑΑΠ/26.08.2011

<sup>32</sup> O.G. 247/ΑΑΠ/201

<sup>33</sup> The Directorate for Environment and Territorial Planning informs that, so far, no award of contract by the relevant Municipality has come to its notice, nor was any application submitted, concerning the initiation of procedures for the preparation of the Oinofyta General Urban Plan.

## 7. Collective Complaints:

(a) 76/2012 “Federation of IKA-ETAM pensioners v. Greece”,

(b) 77/2012 “Panhellenic Federation of Public Service Pensioners v. Greece”,

(c) 78/2012 “Pensioners’ Union of the Athens-Piraeus Electric Railways (ISAP) v. Greece”,

(d) 79/2012 “Panhellenic Federation of Pensioners of the Public Electricity Corporation (POS-DEH) v. Greece”,

(e) 80/2012 “Pensioners’ Union of the Agricultural Bank of Greece (ATE) v. Greece”

### Developments in the social security/pension system of Greece:

By virtue of Law 4387/2016 on «*Unified Social Security System – Reforming social security and pension system*» (A’85/12-5-2016) [see ANNEX1], the social security system was restructured, in the context of the Unified Social Security System, on the basis of the general principles of decent living and social protection under conditions of equality, social justice, redistribution and solidarity between generations, aiming at equity (unified rules for all, old and new pensioners, workers of the private and the public sector, salaried persons and the self-employed) and social justice (ensuring adequate pension also for vulnerable social groups by means of a national pension and high replacement rates).

More specifically:

#### 1) **Unified Social Security Institution**

Key innovation of the new social security system is the establishment of the **Unified Social Security Institution (EFKA)**, which was launched on 1<sup>st</sup> of January 2017.

The Main Social Security Bodies are included in the EFKA in order to cover individuals insured with them against risks provided for by the relevant law and grant them the following benefits provided for by the said law: **(a) old age, disability and survivor’s pension paid on a monthly basis to the persons insured and/or members of their families, (b) pre-retirement and other provisions to pensioners, (c) sickness provisions in cash, (d) special welfare benefits and (e) any other provisions in cash or in kind** falling under the competence of the EFKA under article 53 of Law 4387/2016).

The social security bodies included in the EFKA are the following:

1. Social Insurance Fund of Employees in the private sector (I.K.A – E.T.A.M.)
2. Insurance Fund for Mass Media Employees (E.T.A.P. – M.M.E.)
3. Insurance Fund for Independent Professionals (E.T.A.A.)
4. Social Security Organisation for the Self-Employed (OAEE)
5. Agricultural Insurance Organisation (OGA)
6. Insurance Fund for Marine Employees (N.A.T.)
7. Insurance Fund for Employees in the Banking and Public Utilities Sector (T.A.I.T.E.K.O.)
8. Unified Insurance Fund for Employees in the Banking Sector (ETAT)

9. Moreover pension-related responsibilities have been transferred to the EFKA, which were exercised by the General Directorate for Public Sector Pensions, General Secretariat of Fiscal Policy, Ministry of Finance (special system for public servants, public sector officials and the military).

It should be pointed out that, even after their inclusion, **the NAT** and **the OGA** continue to have their own legal personality for their responsibilities that are not related to social security issues.

Moreover, it has to be noted that, by virtue of Law 4387/2016, the general, special and statutory provisions of social security bodies are maintained that refer to the obligation of individuals to be insured with the bodies included in the EFKA.

## 2) **New Pension Provision**

Insured persons are entitled to main pension which shall now consist of two parts: **national** and **contributory pension**, the sum of which constitutes old age, disability and survivors' pension. More specifically:

**The national pension** is not funded by social security contributions but directly from state budget while its full amount is set at **384 euros on a monthly basis**, paid in full provided that the person has paid contributions for at least twenty years and has 40 years of residence in Greece. National pension amount is reduced by 2% for every year which falls short of 20 years, provided however that contributions have been paid for at least 15 years.

It has to be noted that in case the insured person has paid contributions for at least 20 years and a full year of insurance is not completed, the amount of national pension he/she shall receive corresponds to the full years of paid contributions while for the remaining months and/or days he/she shall receive a proportion thereof (article 7 of Law 4387/2016).

Exception is made for disability pensioners for who resident in Greece is not a precondition. The same applies for pensioners under the provisions of Law 612/1977 or under provisions that refer to the above law for whom only 15 years of legal and permanent residence in Greece is required.

**The contributory pension** amount is calculated on the basis of pensionable earnings, years of insurance contributions paid and replacement rates per year. In order to calculate the contributory part of a pension, the average monthly salary – income earned throughout the working life (articles 8 and 28 of Law 4387/2016) is taken into account as pensionable earnings and, in particular, from 1-1-2012 till the retirement application date.

It has to be noted that given the above mentioned regulations concerning national and contributory pension, the following articles were expressly repealed: 1) articles 1 to 4 of Law 3863/2010 establishing, as of 1-1-2015, the pension amount as a sum of the basic plus the proportional part of it, b) article 3, para.3 of Law 3863/2010, providing for the minimum sum of basic plus proportional old age pension for 15 years of paid contributions (article 28, para.4 of Law 4387/2016).

Moreover, the conditions are regulated under which a survivors' pension is granted to the pensioner's or contributor's family members with derived or inherited entitlements, provided that the death occurred on or after 13-5-2016. Common principles and rules are introduced for all contributors, irrespective of their insurance fund. Thus, as of the above mentioned date, any other otherwise regulating statutory or general provision is repealed, concerning deaths after the entry into force of Law 4387/2016 (article 12).

Moreover, provision is made for new common rules for all disability pensions and disability benefits (paraplegia – quadriplegia, total invalidity). More specifically, the conditions shall be laid down for the establishment of disability pension entitlement, the degree of disability fixing the corresponding pension amount (full or reduced) and all other issues relating to the provision of a disability pension in general, following the conclusions of the Committee as referred to in article 11 of Law 4387/2016.

Provision is made according to which, for old age pension applications filed till the entry into force of the above law, i.e., till 12-5-2016, the method used to calculate old age pensions shall be the one referred to in the provisions effective on 31-12-2014, (article 94, para.1 of Law 4387/2016).

### **3) Maximum pension amount**

A maximum pension amount is established for persons who were granted pension entitlement by virtue of the previous law (before the entry into force of Law 4387/2016).

Up until 31-12-2018, the amount paid for each individual monthly pension may not exceed 2.000 euros, thus, the payment of the amount exceeding 2.000 euros shall be suspended till 31-12-2018. In cases where the pensioner is entitled to receive two or more pensions on any grounds from the Public Sector Fund, Public Bodies Corporate or any main or supplementary social insurance fund, the sum of their net amounts may not exceed 3.000 euros.

However, there is no ceiling for pension amounts that will be calculated by using the new calculation method (national and contributory) (article 13).

### **4) Employment of pensioners**

The provisions referring to the employment of pensioners have been amended. According to the new status, as of 13-5-2016, pensioners with entitlements in their own rights (not survivors' pension), who undertake work or are self-employed, shall receive gross pension amounts (main and supplementary) reduced by 60% for as long as they are employed<sup>34</sup>.

Prior to taking up any work, pensioners-workers should declare it to the EFKA and the supplementary insurance fund (ETEAEF). Failure to declare such work implies that the amount that would have been withheld for the duration of their employment + an annual interest of 4,65% should be charged to the pensioner. The charged amount shall be offset against future pension amounts and up to ¼ of the monthly pension amount (article 20).

### **5) Concurrent social security coverage**

The provisions relating to concurrent social security coverage have been amended. Now insured persons, who, under general, special or statutory provisions (as applicable until the entry into force of Law 4387/2016), are compulsorily insured with two or more insurance bodies or sections included in the EFKA, shall pay set contributions for each one of the activities they undertake, irrespective of the year they were insured.

More specifically, in order to be engaged in activities for which, (under the provisions applicable on 12-5-2016), the individual should have been insured with more than one insurance body, section or branch included in the EFKA, contributions shall be paid for each one of the professional activities undertaken. It has to be noted that in this case the obligation to pay minimum monthly social security contributions applies only to the first activity undertaken.

In case a person is bound by dependent working relationship and also engaged in activities self-employed for which he/she should be insured with one insurance body, section or branch included in the EFKA (under the provisions in force on 12-5-2016), he/she shall pay monthly contributions as salaried person and contributions depending on the income earned from the freelance activity.

In case the person engaged in an activity should have been insured with 2 or more insurance bodies, sections or branches included in the EFKA (under the provisions in force on 12-5-2016), he/she shall pay monthly contributions as salaried worker (article 36).

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<sup>34</sup> For those who had undertaken work up until 12-5-2016, the provisions of article 63 of Law 2676/1999 apply as in force after their replacement by Law 3863/2010.

## 6) Social Security Contributions of Salaried Persons

Unified social security contributions are established for salaried persons insured with the EFKA and their employers. Moreover, the ceiling for insurable earnings is regulated in order to calculate the social security contributions of salaried workers to main insurance bodies that shall be included in the EFKA as of 1-1-2017.

More specifically, in order to calculate workers' and employers' monthly contributions, the ceiling for insurable earnings is ten times the amount of an unmarried worker's minimum basic salary each time provided for. In accordance with the applicable provisions, the ceiling is ten times the amount of an unmarried worker's minimum basic salary aged over 25. By virtue of article 1, para.3 subpara.IA.11 of Law 4093/2012, the minimum basic salary of an unmarried worker over 25 is set at **586,08 euros**. The ceiling, therefore, for insurable earnings, in order to calculate workers' and employers' monthly contributions, amounts to **5.860,80 euros**.

The said ceiling also applies to multiple salaried employment or employment on salaried assignment basis, but only with regard to worker's contributions (article 38).

For salaried workers, social security contributions for health care are set at 7,10%, on any type of earnings and, by virtue of para.2 of the same article, for freelance professionals and self-employed persons, they are set at 6,95%, on the insurable income earned from their economic activity.

## 7) Social security contributions of non-salaried persons and farmers

As of 1/1/2017, the contributions of persons insured with the OAEE, the ETAA and the OGA shall be calculated on the basis of the income earned from their economic activity during the previous tax year, taken on a monthly basis.

The above mentioned income may not be less than the minimum basic salary of an unmarried worker aged over 25 on a monthly basis (today €586) and more than 10 times that amount (today €5.860). Especially for persons insured with the OGA, the monthly income may not exceed 70% of the minimum basic salary of an unmarried worker aged over 25 (today €410).

The premium amounts to 20% for the OAEE and the ETAA, while for the OGA it shall be gradually set at 20% as of 1/1/2022, in order to avoid imposing undue burdens on contributors.

Moreover, under article 40 of Law 4387/2016, farmers' and own-account workers' social security contributions for health care insured with the OGA, shall increase gradually as follows:

- a) from 1/1/2016 up to 31/12/2016 from 2,50% to 3,61% on the existing social security classes at the entry into force of Law 4387/2016, and
- b) as of 1/1/2017, social security contributions for health care of own-account workers shall be set at 6,95% on the insurable income earned by their economic activity.

## 8) Pensioners' contributions for health care

A unified method is established for the calculation of pensioners' contributions for health care covered by the EOPYY (article 44). More specifically:

- a) from 1/7/2016, 6% on the main pension amount payable after deducting the amounts that correspond to Pensioners' Solidarity Contributions and
- b) from 1/1/2016, 6% on the supplementary pension amount payable after deducting the amounts that correspond to Pensioners' Special Contribution on Supplementary Insurance. Such contribution is not deducted from the non-institutional benefit paid to pensioners.

**In conclusion**, it's worth noting the following:



Due to the ongoing economic crisis and commitments of recent years under the Memoranda, insured persons nowadays in Greece are at a disadvantage than in previous years.

However, it has to be underlined that when taking austerity measures efforts were made not to affect the most vulnerable population groups by ensuring the payment of social benefits (old age, survivors', disability pensions, etc.) to beneficiaries and avoiding any reductions in them. Moreover, the overriding objective of restructuring the social security system was **to achieve its long-term sustainability and an equitable distribution of provisions and social benefits to beneficiaries.**

## Article 1: The right to work – para3: Public Employment Services

### PART I

With regard to the current legislation, we refer to the previous Greek Report, noting again that all public services in Greece are free. In this context, the same applies to the Public Employment Services provided by the Greek Manpower Employment Organization (OAED).

### Additional Questions from the European Committee of Social Rights

Regarding the operation of Public Employment Services (PES), please find below the following figures as collected by the competent Directorate of OAED:

1	Number of jobs notified to Public Employment Services (PES)	162.335	OAED data June 2017
2	Number of placements within PES	77.073	OAED data June 2017
3	Percentage of placements compared to the number of vacancies notified	48.00%	OAED data June 2017
4	Placements from PES as a percentage of total employment in the labour market	4.00%	OAED data June 2017
5	Number of counselors in PES (dealing exclusively with the specific subject)	303	OAED data June 2017
6	Proportion of PES counselors compared to registered unemployed persons	1 to 3.000	OAED data June 2017

### ***ANNEX A: Labour Market Policies Database***

European Commission's need to monitor the progress made by the Member-States for the implementation of Employment Guidelines boosted the creation of the Labour Market Database-LMP. The database was created in 1998 by Eurostat and the Directorate-General of the European Committee for Employment and Social Affairs, **aiming at collecting detailed information on the actions of the Member States' labour market policies**, in a reliable and comparable way among different actions and different states.

LMP's objective is the compilation of all labour market measures that can be defined as: **“Public interventions in the labour market aimed at reaching its efficient functioning and correcting disequilibria and which can be distinguished from other general employment policy interventions in that they act selectively to favor particular groups of persons with difficulties in the labour market”**.

Data is collected through the method of completing questionnaires drafted by the European Commission and sent to the Member-States.

In Greece, the Ministry of Labour and its bodies, as well as services from other ministries, are invited to fill in the questionnaires with the requested qualitative and quantitative data they possess for each action. The information collection concerns **those participating in actions for the implementation of policies and for the relevant public expenditure**.

The statistic base unit is the “actions” **corresponding to the programs** (ex. new jobs program) **or the services** (individualized approach services) **provided to the unemployed and other jobseekers by the competent bodies of each country**.

In short, the methodology classifies the policy measures to the following basic categories regarding the action type. The categories to which are targeted the measures that the European Union's Member-States have to take for LMP are the following:

- Labour Market Services/ Counseling
- Training
- Employment incentives
- Integration of People with Disabilities (PWD)
- Subsidized job
- Start-up incentives/ initiatives
- Out-of-work income maintenance and support (as unemployment benefits)
- Early retirement

Furthermore, reference data is also included referring to data not related to single LMP interventions but which describe and quantify the main targets of LMP interventions and which are used for reference purposes. Reference data cover the number of registered unemployed, of registered unemployed and other jobseekers registered with the PES (OAED in Greece).

Each Member-State **sends** all the relevant national actions to the European Commission's Directorate of Employment **on an annual basis**, while the previous year's data are sent every autumn.

The following table shows the **interventions (active or passive)** implemented by OAED in 2015<sup>35</sup> (when the data registration in the LMP Database by the Central Agency Section of our Ministry began) that are included in the LMP Database.

**Table with interventions (active, passive) implemented by OAED in 2015**

a/a	Interventions implemented by OAED	Intervention Category
1	Unemployment benefit	Out-of-work income maintenance and support
2	Special unemployment assistance for those exceeding the unemployment benefit period	Out-of-work income maintenance and support
3	Benefit due to the employer's insolvency	Out-of-work income maintenance and support
4	Benefit for young unemployed aged 20-29 (ESPA)	Out-of-work income maintenance and support
5	Special seasonal assistance	Out-of-work income maintenance and support
6	Benefit for long term unemployed	Out-of-work income maintenance and support
7	Benefit due to temporary lay-off (availability)	Out-of-work income maintenance and support
8	Unemployment benefit for self-employed and freelancers	Out-of-work income maintenance and support
9	Partial unemployment benefit	Out-of-work income maintenance and support

<sup>35</sup> Data for the reference year 2016 are being processed

10	Local Integrated program for 1020 unemployed and 200 employed in the region of Kastoria	Training, job subsidy, Start-up Incentives/ Initiatives
11	Subsidy program for 6.000 new freelancers- young scientists entitled “Program for New Freelancers- Young Scientists of 2009”	Start-up incentives/ initiatives
12	New Freelancers CYCLE B	Start-up incentives/ initiatives
13	Entrepreneurship program for young unemployed aged 22-64 years old	Start-up incentives/ initiatives
14	Employment Promotion Program through financial support of business initiative for 2000 young unemployed aged up to 35	Start-up incentives/ initiatives
15	Special Program for New Freelancers enhancing liquidity and employment for administrative regions of priority axis 7	Start-up incentives/ initiatives
16	Special Program for New Freelancers enhancing liquidity and employment for administrative regions...	Start-up incentives/ initiatives
17	Grant Program for 800 unemployed New Freelancers and Grant Program for Ergonomic Layout of the Workplace for 50 persons with Disabilities	Start-up incentives, rehabilitation of PWDs
18	Promoting employment through public welfare programs	Job creation/ subsidy (general interest)
19	Program subsidizing companies to hire unemployed graduates, up to 35 years old	Job creation/ subsidy
20	Program subsidizing companies to hire disadvantaged and severely disadvantaged persons	Job creation/ subsidy
21	Work experience subsidy program for unemployed aged 16-24	Job creation/ subsidy
22	Subsidy program for hiring unemployed aged 55-64 in enterprises of first- and second-level local self-government organizations	Job creation/ subsidy
23	Subsidy program to strengthen the organizational capacity of Organizations-members of ESEE and GSEVEE	Job creation/ subsidy
24	Two-year employment promotion program for young aged up to 30 and special groups of unemployed	Job creation/ subsidy
25	Four-year employment promotion program for young and special groups of unemployed	Job creation/ subsidy
26	Subsidy program for enterprises and employers in general for the employment and training of 10.000 beneficiaries of the voucher for reintegration into the labour market	Job creation/ subsidy
27	Program subsidizing companies to hire unemployed close to retirement age	Job creation/ subsidy
28	Subsidy program for the creation of 10.000 full-time job positions for unemployed aged 30-66	Job creation/ subsidy
29	Subsidy program for hiring young unemployed who	Job creation/ subsidy

	participated in the program “Entry voucher in the labour market for young unemployed”	
30	Subsidy program for hiring 10.000 beneficiaries of interventions “Local intervention plans for employment” and “Local Social Inclusion Interventions for vulnerable groups”	Job creation/ subsidy
31	Program subsidizing companies to hire 11.000 unemployed persons aged 25-66	Job creation/ subsidy
32	Employers’ Subsidy Program for creating 4.200 new jobs in mid-crisis for administrative regions of priority axes 7 and 8	Job creation/ subsidy
33	Employers’ Subsidy Program for creating 4.200 new jobs amid unemployment crisis in the administrative regions of priority axis 8	Job creation/ subsidy
34	Three years employers’ subsidy program for hiring 2.300 vulnerable unemployed persons	New jobs, integration of PWDs
35	Integrated intervention program for 800 former employees of specific enterprises of the insurance sector	New jobs, Start-up incentives/ initiatives
36	Vocational Training Programs for unemployed persons with disabilities (PWDs)	Training
37	Counseling for undertaking entrepreneurial initiatives	Counseling
38	Counseling for job seeking techniques	Counseling
39	Counseling for vocational orientation-reorientation	Counseling
40	Individualized/ personalized approach (OAED)	Reference data

## **PART II**

### **INTRODUCTION**

The OAED is the public employment agency supervised by the Ministry of Labour, Social Security and Social Solidarity.

With regard to the current legislation, the OAED implements the government policy for employment and unemployment, the assisted and facilitated integration of manpower to the labour market, the insurance against unemployment, the promotion of vocational education and training and its connection with employment. The OAED elaborates and implements Active Employment Policy programs on the basis of the political guidelines given by the Ministry of Labour and supports the country’s manpower.

Since 2012, the OAED implements the Program: “Redefinition of the OAED Operational Model” aiming at meeting the challenges of the Labour Market and improving its efficiency and performance concerning the exercise of governmental policy at the service of citizens.

The main objectives of the program can be summarized as follows:

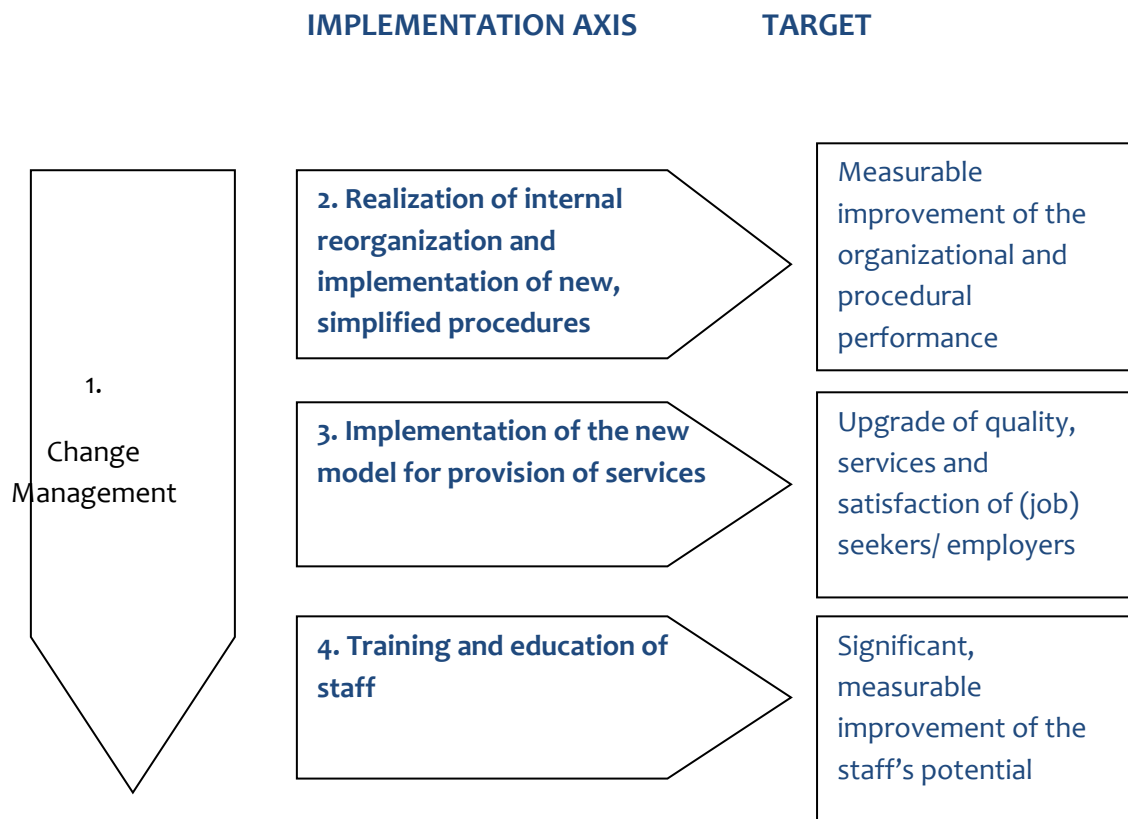
- Planning and implementing more effective policies for tackling unemployment.
- Broadening the services provided to the country’s manpower (unemployed and employees) and improving their quality considerably.
- Establishing stable and efficient relations with the business world for the benefit of the unemployed.

- Increasing its internal performance by optimizing workforce and new technologies and implementing new methods of organization and administration.
- Strengthening its role in the implementation of employment policies and the regulation of the labour market.

Although the program is still in progress, the up-to-date course and the assimilation of the resultant changes have already introduced a significant and multilevel improvement of the Organization and of its provided services to citizens.

## IMPLEMENTATION PERIOD 2015-2016

The implementation plan 2015-2016 was structured around three priority axes:



Each axis included key actions targeting at the improvement of the performance and quality of the services provided by the Organization.

The key actions of the program can be summarized as follows:

- **Reorganization of the Employment Promotion Centers (KPA)<sub>2</sub>:**

Implementation (roll out) - by all KPA<sub>2</sub> - of all the successful pilot procedures of the Program's previous stage (new roles, new practices, monitoring of performance report card indicators).

For example, we mention the two new roles developed within the framework of KPA<sub>2</sub>:

- A reception was created for the direct information of citizens, dealing with the influx of citizens into services, alleviating significantly the services' burden and shortening the waiting time.
- In order to manage the needs arising from the program, within the context of the KPA<sub>2</sub>, the role of the intermediate change management body has been developed assisting the Head of department and facilitating the effective changes management within the KPA<sub>2</sub>.

- **Call Center:** It is fully operational. The objective is to provide direct and reliable information to all those having transactions with the Organization's central, regional and local agencies across the country while saving at the same time human and other resources.

- **New Portal:** The improvement of the web portal aiming at the effective conjunction of labour supply and demand and the extended automation of the Organization's provided services for better respond to the needs of different users.

- **Profile analysis- classification of jobseekers:** The profile analysis of the registered unemployed and their classification so that the provision of adequate services by the labour consultants is better suited to their needs.
- **Improvement of relations with employers:** a package of measures for the employers' effective approach by the Organization (major employers Unit, employers' labour consultants, tools and methodologies, services via portal, collaboration with social partners).
- **Simplification of Procedures:** Simplification of the Organization's key operational procedures and control at various stages aiming at improving the promptness, the reliability of the procedure and the saving of human resources. The implementation was launched in 2016 and continues in 2017.
- **Active Employment Policies:** Effectiveness improvement via better planning, targeting and implementation of training and employment programs (New generation of active employment policies). This action began in April of 2015 and since then has been constantly evolving.
- **Education/ training of personnel:** The training of more than a third of OAED's personnel is a major achievement of the Program. The training needs of the personnel in horizontal and vertical skills and in new tools and practices as long as the relevant training will continue throughout 2017 and will be carried out both by its own means and also via cooperation with the Training Institute (INEP) of the National Center for Public Administration and Local Government (EKDDA).
- **New Administration model and Performance Indicators:** The establishment of a new administration model for OAED (management by objectives) and the monitoring of qualitative and quantitative parameters of the Organization's daily operation via selected performance indicators constituted and yet constitute a key action for the achievement of OAED's strategic and operational objectives for 2017.
- **Establishing a new organizational chart.** The first phase was completed in 2016 and the second in July 2017. It is expected to be adopted in September of 2017.

### IMPLEMENTATION PLAN 2017 – Programme's D' Phase

In order to implement the tools and procedures produced in the previous phases of the Organization, OAED collaborated with its partners and elaborated a Program Implementation Plan for 2017, which is expected to be completed in December 2017.

The Implementation Plan is structured around the following five priority axes:

- **Staff training**

The objective is to complete the staff training programs in accordance with the Program's needs and to establish an internal network of trainers within the Organization.

- **Designing an organizational unit for human resources management and development**

The objective is the modernization and the effective management and development of the Organization's manpower.

- **Implementing a performance management system**

The objective is to develop a performance management system in order to evaluate the Organization's efficiency and performance.

- **Process simplification and automation**

The objective is the rationalization of focal operating procedures and the service of the organization's users and the improvement of the quality service of users

- **Implementation of a communication plan**

The objective is to update all the levels of the Organization as well as its external environment regarding changes in the Organization's new model for the provision of services.



## ***ANNEX B: Analysis of Deliverables of the Programme's C' Phase***

### ***Enhancing mechanisms and tools for supporting and facilitating access of jobseekers to the labour market***

- The role of the Labour Consultants in KPA<sub>2</sub> was redefined regarding the profile, the role, the competences and the tools at their disposal. Emphasis was given to the targeted communication with employers in order to increase vacancies. Specifically:

- 2 new Guides were sent to the 118 KPA:
  1. KPA<sub>2</sub> guide (new roles-procedures-tools) and
  2. Business approach guide

On the basis of new roles and procedures, 44 trainers of labour consultants have been trained (assuming both roles - labour consultants for jobseekers and employers) in the context of reactivating the role of labour consultants.

- The development of a new model recommending unemployed for vacancies and employment promotion programs is being in process. The final objective is the qualitative conjunction of labour supply and demand, ensuring the Organization's reliability towards the enterprises. An effective recommendations procedure is important for the implementation of a new model for services provision with a strengthened role of the Labour Consultants.

- Recently, a Register of Employers was established aiming at facilitating the approach and the communication of employers' labour consultants with the local labour market.

- Since 2016 OAED's Unit of Large Enterprises operates in collaboration with the network of employers' specialized consultants from the 118 KPA<sub>2</sub> of the Organization across the country for the organized treatment and management of the large enterprises' and the small and medium sized enterprises' vacancies via the establishment of standardized procedures for approaching employers.

- OAED, as a member of the Needs Diagnosis Mechanism of the Labour Market, initially takes into account the system's outputs.

Furthermore, the National Institute of Labour and Human Resources (EIEAD) has committed to providing a user-friendly online application for the dynamics of professions and sectors at a national, regional and local level in order to be deployed by OAED's labour consultants.

### ***A Profiling and Segmentation methodology for unemployed individuals was developed***

The new methodology is based on the definition of specific criteria contributing in the classification of jobseekers on the basis of individual characteristics recorded on their registration as well as via a special questionnaire they fill in themselves. From the above data results automatically the segmentation of jobseekers without the intervention of a labour consultant. Thereby, an "objective" classification is achieved and the homogeneity of the entire procedure is ensured. It applies to all the same criteria in an automatic and fair manner and the use of technology in order to ensure equal treatment for jobseekers.

#### Expected benefits of the new methodology

- Supporting the procedure of labour supply and demand conjunction (associating the jobseekers' profile with the vacancies' profile) by collecting and recording data on the individual characteristics of the unemployed.
- Improving the individualized approach procedure by the labour consultants on the basis of the full profile of each unemployed person, namely, diagnosis of his needs on the basis of the integration/reintegration obstacles encountered, as well as provision of targeted and effective services corresponding to the individual's category and profile.

- Reducing the time the labour consultant dedicates today for data collection and input regarding jobseekers, so that the labour consultant can focus on the elaboration of a detailed, individualized and efficient individual action plan.
- The categories of unemployed persons the labour consultants are primarily dealing with, as well as the group in need of recourse to other bodies (ex. social and health services) are defined as a condition for the good use of the support services provided by the Organization.

***Through OAED's online portal:***

- Certified employers are able to submit notices for vacancies, managing, deactivating and reactivating them.
- Certified employers are able to seek CVs of unemployed via a simple and advanced search.
- Jobseekers are able via the search tool of the new OAED portal to seek for job vacancies on the basis of their specialization and of the area where they wish to work.
- An interconnection with the EURES network via the Portal is provided for exploring employment opportunities on behalf of the jobseekers across the countries of the EURES network.
- Furthermore, through the new portal (which interoperates with OPS OAED) it is possible on a daily basis to electronically connect job vacancies and CVs submitted, while informing employers and jobseekers of the e-connection results.

***Redesign, targeting to the implementation and assessment of active employment policies***

The Program contributed to the following:

- Targeting of services and active employment programs of the Organization to the real needs and characteristics of the unemployed and the enterprises.
- Development of cooperation and partnership among OAED and public sector bodies, social partners and their institutes in order to tackle unemployment more effectively.
- The mobilization of Labour Consultants and the new segmentation methodology for unemployed persons contribute considerably to the individualized approach of jobseekers and the business world giving the possibility for a better labour supply and demand conjunction as well as for EPA redesign on the basis of open programs (pilot program of the Municipality of Kallithea).

***Enhancing cooperation with other institutions:***

- In the framework of the Program was developed the cooperation with the National School of Public Administration which conducted a study on OAED's training needs as well as a large part of Organization's training and education programs.
- The cooperation with the National Organization for the Certification of Qualifications and Vocational Guidance (EOPPEP), aiming at exploiting, developing and adopting new digital consultation tools on behalf of the Organization.
- Under the EPA redesign, collaboration with the social partners was developed for the first time. Their institutes will take action in OAED's programs funded by the Youth Employment Initiative via programming agreements. The Business Approach Strategy will soon be open to consultation.

***Aiming at effectively connecting education with the labour market as well as stimulating cooperation with enterprises***

- There are already 30 Vocational Training Interconnection Offices operating at OAED Apprenticeship Schools as contact points for provision of services for Apprenticeship and a process for the extension of establishment and operation of interconnection offices to other training units of the Organization (A and B phases) is in progress.