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## **EUROPEAN SOCIAL CHARTER**

25<sup>th</sup> National Report on the implementation  
of the European Social Charter

submitted by

## **THE GOVERNMENT OF GREECE**

- Follow up to Collective Complaints
- Complementary information on Articles 11§2 and 13§4 (Conclusions 2013)

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**CYCLE XX-4 (2015)**





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

*Follow-up to the decisions of the European  
Committee of Social Rights relating to  
Collective Complaints (2000 – 2012)*

*Ministry of Labour, Social Security  
& Social Solidarity*

*May 2015*

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## **1. Collective Complaint 8/2000 “*Quaker Council for European Affairs v. Greece*”**

### **BACKGROUND**

In March 2000, collective complaint 8/2000 was lodged with the Secretariat of the Council of Europe by the international non-governmental organization “Quaker Council for European Affairs” concerning the violation of article 1, para.2 of the ESC that prohibits any type of forced labour. The key argument of the complaint was that the alternative service (alternative civil service) for conscientious objectors, as established by Law No.2510/97, as well as its application in practice was of a punitive nature and amounted to forced labour, which is impermissible under the Charter. The complaint was declared admissible and was examined on the merits by the European Committee of Social Rights. The ECSR transmitted its Report to the Committee of Ministers, which, taking into account the commitments made by Greece to amend or abolish the said legislation, adopted a Resolution for Greece.

### **LEGISLATION**

The Ministry of National Defense has been dealing with issues relating to conscientious objectors for many years, while **a large number of legislative initiatives have been undertaken with a view to making the institutional framework governing the alternative service compatible with the international standards**, taking into account the specificities of our country with regard to defense and the adequate staffing of the Armed Forces.

In accordance with article 4, para.6 of the Constitution of Greece, the obligation for **military service at the Greek Armed Forces, is universal and compulsory**, i.e. it applies to all Greek citizens, in the context of safeguarding national security (national defense).

**The performance of alternative service** (the unarmed military service has already been abolished, in accordance with the provisions of article 78 of Act No.3883/2010) constitutes derogation from the above mentioned rule of military service. Those who for reasons of conscience refuse to fulfill their military service, invoking religious or ideological beliefs, may be recognized as **conscientious objectors**, in accordance with the provisions of the **current legal framework** which has been in force since 13-12-2005<sup>1</sup> **while the provisions of the previous legal framework (N.2510/97), mentioned in the collective complaint No.8/2000 against our Country, do not apply any more.**

The abovementioned **alternative form of military service** that exists under the terms and conditions of the said Act, is constitutionally grounded on the interpretative statement concerning article 4, para.6 of the Constitution of Greece, according to which, **the obligatory provision of other forms of services outside the Armed Forces by those who have documented conscientious objections for the performance of military service is defined.**

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<sup>1</sup> Articles 59 to 65 of Act No.3421/2005 «Recruitment of Greek soldiers and other provisions» (O.G. 302 A’), as in force after being amended by article 78 of Act No.3883/2010 (O.G. 167 A’)

The **military duty** is performed armed at the units and services of the Armed Forces. The duration of a full military duty at the Navy and the Air Force is **12 months**, while the duration of a reduced service is **9, 6 and 3 months**. In the Army, a full military service lasts **9 months** while a reduced service lasts **8, 6 and 3 months**, in accordance with the Decisions of the Ministry of National Defense<sup>2</sup>. Usually, the performance of the largest part of an **armed military service** is carried out at military units established at the border regions, due to the geopolitical position of our country, while the soldiers are required to meet the increased requirements and duties under unfavourable conditions.

Conscientious objectors perform **alternative service, by providing services of general interest** in units of the broader public sector (hospitals, municipalities, public financial services, services relating to real estate, courts, post offices, social welfare institutions, etc) under favourable “working” conditions. **When the institution took effect (upon entry into force of Act No.2510/97) the duration of full alternative service could reach thirty nine (39) months. After a gradual stepped reduction (to 34,32,30,23,17 months), in the duration of alternative service, conscientious objectors are now finally discharged**, in accordance with the provisions of the relevant Decision of the Ministry of National Defense<sup>3</sup>, issued in exercise of powers conferred by article 60 of Act No.3421/2005<sup>4</sup>, **after completing the following periods of service:**

- (1) **Fifteen (15) months**, for those who would be required to serve full military service, if they would serve an armed military service.
- (2) **Twelve (12) months**, for those who would be required to serve reduced nine (9) months’ military service, if they would serve an armed military service.
- (3) **Nine (9) months**, for those who would be required to serve reduced six (6) months’ military service, if they would serve an armed military service.
- (4) **Five (5) months**, for those who would be finally dismissed from the Armed Forces, if they would serve an armed military service, after the completion of a three (3) months’ real military service.

It follows from the above that the duration of an alternative service **is directly linked with** the duration of service of those who perform an armed service. **The difference in the duration of an alternative service against the armed service can no longer be considered as disproportionate nor can it be considered that it does not fall within reasonable limits.** On the contrary, it is considered to be **reasonable and fair**, in order to prevent undermining the institution and exclude any possibility of presenting it as an interesting alternative proposal for those persons who would occasionally chose this type of military service on the grounds of **comfort and convenience**. Moreover, the fact that the alternative service is **less burdensome** than the armed one, **justifies its longer duration, thus restoring the proportional equality under article 4 para.1 of the Constitution.**

Those who complete an alternative service do not have the military status, yet they are considered as quasi **enlisted in the Armed Forces**. They do not cover permanent posts of the

<sup>2</sup> Decision F.420/107/5661/Σ.434/15-12-2003 of the Ministry of National Defense (O.G. 1872 B’) and Decision F.421.4/2/204367/Σ.969/19-6-2009 of the Ministry of National Defense (O.G. 1224 B’).

<sup>3</sup> Decision F.421.4/1/280115/Σ.20/11-1-2011 of the Ministry of National Defense (O.G. 111 B’ B’)

<sup>4</sup> Act **No.3421/2005** «Recruitment of Greek soldiers and other provisions» (O.G. 302 A’), as in force after being amended by Article 78 of Act No.3883/2010 (O.G. 167 A’).

body to which they are allocated, yet **they are treated equally to the employees of the body in terms of their health care (without paying contributions) and administrative issues in general.** The performance of alternative service by the conscientious objectors **does not imply any restriction to their subsequent employment, is not considered as impediment for civil service appointment and, moreover, is recognized as pensionable service.**

Furthermore, those who perform an alternative service are entitled to food and housing by the body to which they are allocated, and in case the body fails to provide them with food and housing, a sum of money is paid to them which amounts to **223,53€ monthly**, in accordance with the provisions of Joint Ministerial Decision 2/24407/0022/09-06-2005 (O.G.858B'). The above amount is proportional to feeding, housing, clothing and educating costs required for a person who performs an armed service and that are borne by the State.

Furthermore, in order **to strengthen and improve the institution**, a possibility has been **legislatively established, according to which, conscientious objectors can be allocated permanently to another body**, if they so wish, in case of family, financial and social problems, after completing seven (7) months of alternative service in accordance with the provisions of article 5, para.3 of Decision No.F.420/79/81978/S.300/21-12-2005 of the Ministry of National Defense (O.G.1854 B'), as in force, following its amendment by article 1 of Decision F.429.1/1/280116/S.21/11-1-11 of the Ministry of National Defense (O.G.111 B').

Moreover, those who reach the age of 35 **can buy off the remaining duration of their alternative service**, provided that they have been allocated or will be allocated to bodies of the public sector and after having previously performed alternative service for at least three **(3) months**, in accordance with the provisions of article 79 of Act No.3883/2010. The amount paid in order to buy off each month of alternative service is set at 810 Euros (amount paid respectively, in order to buy off each month of armed service).

**Contrary to what was previously in force, conscientious objectors are no longer exempt from the right to alternative service every time they :**

- (1) **Participate in trade union activities or strike actions** during their alternative service, in which case the duration of their alternative service increases for a period equal to the days of strike.
- (2) Are punished during their alternative service due to violation of provisions on the granting of leaves of absence, with penalties that apply to the employees of the body to which they have been allocated. In this case, the duration of alternative service increases for a period double the days of unjustified absence.

With regard to the issue of leaves and working time, we would like to inform you that in accordance with the provisions of article 64, para.2e of Act No.3421/2005<sup>5</sup>, conscientious

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<sup>5</sup> Act **No.3421/2005** «Recruitment of Greek soldiers and other provisions» (O.G. 302 A'), as in force after being amended by Article 78 of Act No.3883/2010 (O.G. 167 A')

objectors **are entitled to two (2) days' leave of absence for every month of service.** By virtue of relevant Circular F.420/62/60778/S.207/13-04-1999 YPETA/DSSAD/C (communicated to the bodies where conscientious objectors are placed in order to perform their alternative service), clarifying instructions have been given, according to which **leaves of absence may be granted for less than twenty four hours and with a possibility of overnight stay, irrespective of the leaves they are entitled to.** Also, when there is a genuine need, the extension of working time in non-working hours is possible, in the context of their duties, but not the uncontrolled and systematic extension of these time limits. Their employment during specific number of holidays per month is permitted, based on planning by the Bodies, while the full equation of working days to holidays is not permitted. In general, during alternative service, limitations and exclusions of rights that do not comply with the legislation and the general principles of the law are not permitted.

**In conclusion,** we would like to mention that alternative service is considered as **quasi military service,** constitutes a **voluntary choice** of the conscientious objector and **cannot be regarded as having those legal characteristics that constitute a standard working relationship,** under labour legislation. **It is not considered as forced labour** and, in no case, can it be considered that **those who perform alternative service are under dependent working relationship with the body to which they have been allocated and serve.**



## **2. Collective Complaints:**

**(a) 15/2003, “*European Roma Rights Centre [ERRC] v. Greece*”**

**&**

**(b) 49/2008, “*International Centre for the Legal Protection for Human Rights – [INTERIGHTS] v. Greece*”**

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### **BACKGROUND**

(A) In April 2003, collective complaint 15/2003 was lodged with the Secretariat of the Council of Europe by the international non-governmental organization “European Roma Rights Center” concerning the violation of article 16 of the ESC that guarantees the right of the family to social, legal and economic protection, in conjunction with the non-discrimination clause of the Preamble to the Charter. The implementation of discriminatory housing policies by the State against Roma and the widespread practice of forced evictions of Roma from the settlements where they live, as well as the unacceptable living conditions in their settlements were the key arguments of the complaint. The complaint was declared admissible and was examined on the merits by the European Committee of Social Rights. For the said complaint, following a request by the complainant organization and the decision of the ECSR, the hearing of the parties was held by the ECSR on 11/10/04 in Strasbourg, at the headquarters of the Council of Europe). The ECSR, following the written and oral procedure, transmitted its Report to the Committee of Ministers which, taking into account the measures and actions initiated by Greece, adopted a Resolution.

(b) In March 2008, collective complaint 49/2008 was lodged with the Secretariat of the Council of Europe by the international non-governmental organization “International Centre for the Legal Protection for Human Rights” concerning the violation of article 16 of the ESC that guarantees the right of the family to social, legal and economic protection, in conjunction with the non-discrimination clause of the Preamble to the Charter. The implementation of discriminatory housing policies by the State against Roma and the widespread practice of forced evictions of Roma from the settlements where they live as well as the unacceptable living conditions in their settlements were the key arguments of the complaint. The complaint was declared admissible and was examined on the merits by the European Committee of Social Rights. The ECSR transmitted its Report to the Committee of Ministers which, taking into account the measures and actions taken by Greece, adopted a Resolution.

## **A. LEGISLATION**

As regards the special issue of forced evictions against Roma populations, we would like to point out the following substantive and procedural provisions on the protection of municipal property by persons who are illegally occupying it, in general, by enforcing the provisions applicable to the State:

Under article 178 of the current Code of Municipalities and Communities (Act No.3463/2006, O.G.114A'/8.6.2006), Municipalities are required to maintain and protect all types of property they own (para.1), the immovable property of Municipalities and Communities is protected, in accordance with the provisions of the legislation on the protection of the State-owned immovable property, each time applicable. The Municipal Council decides on administrative evictions, while the relevant Protocol is issued by the Mayor (para.4).

Furthermore, article 1 of Legislative Decree 31/1968 (O.G.A'281), on «*Protecting the property of local self-government organizations and regulating other issues*» (as replaced by article 3, para.11, Act No.2307/1995 O.G.A'113), stipulates the following: «1. As regards the estates of municipalities and communities the legislation each time in force concerning the protection of State-owned immovable properties applies, in addition to articles 8 to 20 of Act No.1539/1938 (O.G.A'488).

In accordance with the provisions of article 2 of Act No.263/1968 on «*Amending and supplementing provisions on public property*», as supplemented by article 15 of Act No.719/1977, opposition proceedings may be brought against the administrative eviction protocol before the competent Magistrates Court within a non extendable period of thirty (30) days from its communication. The opposition proceedings do not suspend the enforcement of the above mentioned Protocol, yet, by request of the opposing party, the President of the Court of First Instance may order, by means of an act, the suspension of the enforcement until the ruling on the opposition is issued. Similarly, an appeal against the decision rejecting the opposition does not suspend the enforcement of the Protocol.

## **B. ACTIONS**

As regards the **inadequate housing of Roma populations**, in the context of National Roma Policy, the following programmes have been developed:

1. The “**Integrated Action Plan (OPD) for the social integration of Greek Roma**” (2002-2008). This programme, by adopting a single philosophy and shared key objectives for the implementation of decentralized actions and fully addressing all problems, was organized on two central priority axes, placing emphasis on housing infrastructure and services for the implementation of a national policy by means of interventions aimed at reducing social disparities, promoting social justice and the social integration of Greek Roma.

The Ministry of Interior has undertaken the implementation of the Axis entitled **Infrastructure through works and actions for the improvement of the living conditions of Greek Roma**. In this context, Local Self-Government Agencies were funded by the national resources of the Public Investment Programme for the construction of houses and key infrastructure projects, installation of prefabricated houses, construction of water supply and sewerage networks, roads and lighting, social infrastructures, landscape regenerations, creation of playgrounds, land purchase, etc.

The approved budget amounts to **120 million Euros**. **To date projects with a budget of 94 million Euros have been included and 62million Euros have been paid.** *This project is in repayment phase for past financial obligations.*

2. **“Programme for housing loans to the Greek Roma” (2002-2009)** who live in settlements or other constructions that do not meet their housing needs. The programme provided for the granting of 9.000 loans of up to 60.000 Euros each from national resources guaranteed by the Greek State under favourable repayment terms for the acquisition of primary residence.

According to data held by the Directorate for Local Self-Government Economic Development Policy of the Ministry of Interior a total of **7.854 decisions have been issued** to date **and 6.625 beneficiaries of such decisions have concluded loan agreements.**

The loan disbursement is made by the banks while the beneficiaries are responsible for choosing how and from where they will acquire the residence. Applications were submitted at the Municipalities where the beneficiaries resided (principle of proximity to the citizen, knowledge of local affairs).

Loans were granted based on social assessment criteria taking into account the specific lining conditions of the said population group and placing emphasis as a matter of priority on the provision of housing assistance to extended families with minor children or other dependent members, who were widowed or had disabled members or were of low-income status. *The programme was completed pursuant to article 38 of Act No. 4075/2012.*

The above mentioned programme that concerned the loan mechanism, although it applied to a predetermined number of beneficiaries (9.000 families) and therefore, was not designed to resolve the housing problem for the total Roma population in Greece, brought **significant tangible results** to the target population of Roma **as it immediately secured permanent residence for a significant number of them.**

### ***National Strategy for Roma Social Integration***

In the spirit of adopting a holistic approach to the social integration of Roma in the EU Member States, and taking into account the current needs of Roma population and any shortcomings and problems of the previous programmes, Greece designed the **National Strategy for the Social Integration of Roma 2012-2020**<sup>6</sup>, which highlights employment, education, housing and health as key priority areas of policy, in the context of integrated local interventions.

The new framework requires the synergy of stakeholders, including Roma population, especially with regard to the rational long-term planning of interventions. It quantifies goals, identifies indicators to monitor progress, sets a timetable for action and a monitoring mechanism and provides for the establishment of an integrated management administrative mechanism in general<sup>7</sup>.

The key feature of the new strategic framework is the identification of existing needs at local level and the implementation of integrated local interventions, as highlighted by the individual operational plans, the initiative of which lies with the regional authorities, in light of the guidelines of the central administration.

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<sup>6</sup> [http://ec.europa.eu/justice/discrimination/files/roma\\_greece\\_strategy\\_en.pdf](http://ec.europa.eu/justice/discrimination/files/roma_greece_strategy_en.pdf)

<sup>7</sup>In accordance with the Decision of the Inter-ministerial Committee dated 28/08/2013, the National Centre for Social Solidarity was entrusted with monitoring and coordinating.

The National Center of Social Solidarity, in the context of its role as national contact point for the Social Integration of Roma, has data concerning Roma housing which is one of the four pillars of the National Strategy for the Social Integration of Roma, as already mentioned. The available data concerning the implementation of the National Strategy at regional level are included in the **Report on the Implementation of the National Roma Integration Strategy 2013**<sup>8</sup>, submitted to the European Committee in November 2013.

The development of basic infrastructure in Roma settlements is the main measure promoted till today, with a view to upgrading the living conditions of Roma. Relevant pilot actions have been implemented in three regions (Thessaly, Eastern Macedonia and Thrace and Central Greece), placing emphasis on the environmental upgrading and urban landscape regeneration, road and pavement construction, electricity network construction, creation of playgrounds and recreational areas, construction of sewerage and wastewater collection systems, construction of drinking water supply system, construction of rainwater sewerage network, construction of sewage pipelines and their connection to the main wastewater treatment plant.

### **Conclusion**

The development of basic infrastructures in Roma settlements and the provision of low interest housing loans could decrease risks of material deprivation thus upgrading Roma's living conditions, their health status and their communication with the non-Roma community.

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<sup>8</sup> See. Annex I

### **3. Collective Complaint 17/2003 “World Organisation against Torture [OMCT] v. Greece”**

#### **BACKGROUND**

In July 2003, collective complaint 17/2003 was lodged with the Secretariat of the Council of Europe by the international non-governmental organization “World Organisation against Torture” (the OMCT) concerning the violation of article 17 of the ESC that guarantees the right of mothers and children to social and economic protection. The key argument of the complaint was that children are not effectively protected against physical abuse, since the Greek Law does not provide for universal prohibition of all forms of corporal punishment, especially in the family. The complaint was declared admissible and was examined on the merits by the European Committee of Social Rights, which transmitted its Report to the Committee of Ministers. The Committee of Ministers, acknowledging the steps taken and taking into account the commitments made by Greece, adopted a Resolution.

#### **LEGISLATION**

*Prohibition of corporal punishment of children both within the family as well as in primary and secondary education*

According to the modern concepts of human rights, minors are fully entitled to constitutional rights. [Article 2, para.1](#) of the Constitution recognizes the respect and protection of the value of a human person as a primary obligation of the State while article 5, para.2 enshrines the right to protection of life, honour and liberty of all persons living within the Greek territory.

In 2006, Greece prohibited also by law corporal punishment within the family. Under article 4 of Act N.3500/2006, it is made clear that corporal punishment against children does not fall within the scope of the permissible corrective means of Article 1518 of the Civil Code, also in accordance with modern pedagogic points of view. It constitutes an abuse of custody and this is the reason why it incurs the application of article 1532 of the Civil Code<sup>9</sup>; i.e. the court may order any appropriate measure (removal of the exercise of parental care etc). All actions inflicting pain or physical discomfort on minors with a view to punishing them or controlling their behaviour is regarded as corporal violence. The observations of the Committee on the Rights of the Child (of the UN) with respect to Greece, the Recommendations of the Council of Europe and the public position of the Ombudsman on the prohibition by law of corporal punishment of children, have been taken into account for the adoption of the said article.

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<sup>9</sup> It describes the impact of bad exercise of parental care, i.e. when parents abuse their vocation or they are not able to fulfill their parental duties or fail to meet their obligations regarding the custody of their child.

Finally, by way of example, we would like to mention Decision No.14/1993 of Tripoli Magistrate's Court and Decision No.16/2009 of Syros Court of First Instance, according to which, on the one hand, in cases of corporal violence exercised on minors as a means of punishment also within their education, article 1532 of the Civil Code applies (and any appropriate measure is taken), and on the other, punishment through corporal violence today is considered not only antisocial and anti-pedagogical but also clearly punishable under criminal law.

### **School, preschool care and hosting framework**

In the context of school discipline, corporal punishment is explicitly prohibited in **primary education** under article 13 para.8 of P.D.201/1998<sup>10</sup>.

In **secondary education**, article 21 of Act No.3328/2005, prohibits the imposition of any form of corporal punishment against students who deviate from appropriate conduct.

The operation of **municipal nursery schools – crèches** is governed by a provision that explicitly prohibits corporal punishment, the violation of which constitutes «serious disciplinary misconduct», in accordance with article 14, para.1 of JMD 16065/2002 (O.G. B'/497/22-4-2002). Moreover, corporal punishment «is strictly prohibited» concerning the operation of **Child Care Centers**, based on article 23, para.2 of M.D. Γ2β/ 1984 (O.G. B'/860).

Moreover, the Ministry of Education issued a [circular](#)<sup>11</sup> on the «imposition of corporal punishment on students» which, inter alia, provides for the following: *Principles governing Greek educational system do not encourage any kind of authoritarian or violent behaviour of the teacher toward the student. Therefore, any problem of conduct that might arise should be dealt with in a spirit which is in line with modern principles of pedagogy and psychology (school psychology, child psychology etc.). Respecting students' personality, in combination with the special role of the teacher in the development and shaping of their personality, leads to addressing any deviating behavior through understanding and dialogue. The democratic spirit that should characterize the relationship between teachers and students should be present in all aspects of school life, especially in cases of unacceptable conduct. The vast majority of Greek teachers, who honour their vocation assigned by the State, addresses issues of students' behavior in such a way that does not disturb their school life. Yet, following reports-complaints submitted to the Ministry of Education and Religious Affairs concerning few cases of corporal punishment against students, we would like to remind you of article 21, para.1 of of Act N. 3328, (O.G.80 A') according to which in no case «is corporal punishment allowed against students of secondary education who deviate from appropriate conduct».*

## **B. ACTIONS**

### **«Network for the prevention and combat against corporal punishment of children »**

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<sup>10</sup> The said article provides for the following: *Behavioral problems constitute the subject of cooperation among the headmaster, the teachers, the parents and school consultants, with a view to addressing the issue in the best possible pedagogical way. In any case and prior to any decision, the key principle of respect for the personality and the rights of the child is taken into account. Corporal punishment is not allowed.*

<sup>11</sup> It is Circular Γ2/22673/02.03.2006

In October 2005, at the initiative and coordination of the Assistant Ombudsman, the Circle on the Rights of the Child was created, which is a network for the prevention and combat against corporal punishment (website: [www.somatikitimoria.gr](http://www.somatikitimoria.gr)) among bodies involved in children and families.

*Why was the Network for the Prevention and Combat against Corporal Punishment created?*

The Network was created following the shared view of bodies involved in children and families that an extended cooperation and a coordinated information and awareness raising campaign is needed among citizens for the prevention and combat against the use of corporal punishment of children. Everybody should become aware of the fact that beating children is not good! It violates their fundamental rights, damages their mental wellbeing, it is an insult to their personality, it familiarizes them with violence as a means of solving problems and can lead to serious forms of abuse. All those who are responsible for the children's upbringing and care should realize these consequences.

*When was it created and how does it work?*

The Network was created in October 2005, with a cooperation agreement signed by its [founding](#) members. The Network Steering Committee held regular meetings and promoted the development of coordinated actions and the exchange of information among the members on their individual actions. Public or private non-profit bodies that accept the Network's principles, can become [associated](#) members at their request, be informed and invited to its events. **The Children's Ombudsman coordinates the** work of the Network. During the last two years the Network has not undertaken any further actions.

*What are its main objectives?*

The Network's objectives is the cooperation, the exchange of information, the development of joint and coordinated actions, supporting institutional changes and the development of a broad information and awareness raising campaign for parents, children, professionals working with children and families and for the general public. The Network aims at eliminating the social and legal acceptance of corporal punishment of children in our country so that they are educated through dialogue and participation and through methods that comply with modern pedagogical theories.

*The Network's actions to date:*

1. *Information and awareness-raising seminar on issues relating to corporal punishment of children 14-16/11/2006*

In the context of actions undertaken by the Network for the prevention and combat against corporal punishment of children, at the initiative of the Institute for Social Protection and Solidarity (IKPA), a seminar was held on 14-16/11/2006 on the premises of the IKPA Vocational Training Center in Athens, with the participation of 22 scientists. The purpose of the seminar was the information and awareness-raising of scientists on issues relating to the corporal punishment of children. They in turn will train professionals who contact, train and support parents. The following issues were included in the program: the impact and the

effect of corporal punishment on children and society, adults as target group: training and functioning of groups, parents as agents of non-violent behaviour and democratic education, parents as active citizens, etc.

2. *30<sup>TH</sup> of April: International Day against Corporal Punishment (2007)*

On the occasion of the International Day against Corporal Punishment, the Network for the Prevention and Combat against Corporal Punishment of Children, on 30/04/2006, invited bodies and citizens to participate in an effort for the elimination of the use of corporal punishment against children and published the Decalogue against Corporal Punishment of Children with a view to disseminating it as widely as possible.

3. *The Decalogue against Corporal Punishment of Children circulates in Athens (2007)*

More than 700 posters with the Decalogue against Corporal Punishment of Children travel with us in buses, trolley buses, electric and suburban railways and the metro, while the Decalogue is displayed on the monitors in the tram. The Decalogue was drawn up by the Network for the Prevention and Combat against Corporal Punishment of Children in the context of its actions for the information and awareness-raising of citizens on the use of corporal punishment and the adoption of non-violent methods of educating children, such as communication and dialogue.

4. *Three-day seminars for professionals on issues relating to corporal punishment of children*

The Institute of Social Protection and Solidarity organized three-day information seminars for professionals on issues relating to corporal punishment of children at the Vocational Training Centres of Salonika and Xanthi. The one in Salonika took place on 7, 8 and 9 November and the other in Xanthi on 14, 15 and 16 November 2007.

5. *Manual for professionals who train or cooperate with parents*

The Institute of Child Health (Department of Mental Health and Social Welfare) and the Institute of Social Protection and Solidarity, with the participation of the Child Ombudsman, created the manual «Eliminating corporal punishment of children» addressed to professionals who train or cooperate with parents.

6. *Leaflet-decalogue against corporal punishment of children*

A new leaflet of the Network with the Decalogue against corporal punishment of children was published.

7. *Actions on the International Day against Corporal Punishment of Children (2008)*

The members of the Network for a second year made use of the *International Day against Corporal Punishment of Children* (30<sup>th</sup> of April) in order to raise awareness among young and older people against the use of corporal punishment and all forms of violence on children. Through a press release the Network underlined the importance of everybody's participation in changing attitudes and practices in the society on this issue. Moreover, the Network sent a letter to Children, Parents and Teachers that was read in schools and displayed in educational and welfare establishments.

8. *Seminar «Eliminating corporal punishment of children»*



The Institute of Social Protection and Solidarity together with the NGO Home-Start of Nea Ionia, in Volos, organised a meeting on the issue of «Eliminating corporal punishment of children» which was held on 26 and 27/09/2008 in Nea Ionia of Magnesia.

**9. Educational action in order to combat corporal punishment of children in Volos and Nea Ionia of Magnesia (2009)**

The Institute of Social Protection and Solidarity together with the NGO Home-Start of Nea Ionia, in Volos, in February 2009, started an educational action relating to the combat against corporal punishment of children. The action involves the visit of Nea Ionia – Volos Home Start Officials to all parents' association boards of pre-school and school age children in the areas of Volos and Nea Ionia and the cooperation with them.

**10.** On the occasion of «International Day against Corporal Punishment of children», on 30/04/2009 at Zappeion Megaron, during an open to all event of the Paneuropean Campaign of the Council of Europe, a presentation was made dedicated to the elimination of corporal punishment of children.

**11.** On the occasion of Universal Children's Day, **on the 11<sup>th</sup>** of December, the Network in the context of its campaign for the elimination of corporal punishment, created three small videos and a foldable card with the message “Beating came from paradise... Let it come out of our lives too!”.

**12. An event against corporal punishment in Volos**

The Institute of Social Protection and Solidarity together with the NGO Home-Start of Nea Ionia, in Volos, organised an event against corporal punishment on 26/04/2010. In this event, that took place between February and October 2009 in Volos and Nea Ionia of Magnesia, the educational action was presented aiming at informing and awareness-raising of parents against corporal punishment.

**13. Event of the Salonika School of Pedagogy at «OLYMPION»**

On the occasion of «International Day against Corporal Punishment of children», on 30/04/2010, the Network participated in the event organised by the Aristotle University of Salonika, School of Pedagogy, at OLYMPION cinema. The Network was represented by speakers. During the event spots created by the Network were projected together with the whole work and messages of the Network till today.

**14. Open debate at the Ministry of Education on: “How can we help parents raise their children without violence?”**

In May 2011, on the occasion of the 30<sup>th</sup> of April, which is the International Day against Corporal Punishment of children, the Network for the Prevention and Combat against Corporal Punishment of Children organised an open debate in the premises of our Ministry on the issue: “How can we help parents raise their children without violence?” Scientists and professionals from the sectors of health, mental health and education participated in the event with the aim of exchanging views and proposals on the content and method of

education on positive parenting. Moreover, **issues have been raised concerning the work that may be done by teachers, social services and other social bodies towards parental counseling on the education of their children without corporal punishment but with the use of alternative means for their compliance.**

**«Observatory for the Prevention of School Violence and Bullying»**

The Ministry of Education and Religious Affairs operates an Observatory for the Prevention of School Violence and Bullying<sup>12</sup>. The Observatory has the task of designing and implementing actions for the prevention and addressing of school violence and bullying, the identification, study and distribution of school violence and bullying incidents to certified bodies so that they might be managed by them. In order to develop its activities, the Observatory is supported both by the Steering Committee as well as by the Central Scientific Committee.

The actions of the Observatory are implemented under the responsibility of Regional Departments of Primary and Secondary Education. At each Regional Department, at the initiative of the Coordinator of Actions, a network of associated bodies is created that will support prevention actions in schools, mainly aiming at the involvement of institutional, social local bodies and organizations specialized in issues relating to the prevention of violence, psychosocial support to young persons, the rights of the child, mediation of social agencies and social inclusion.

At each Regional Department of Education, a teacher of Primary or Secondary Education has been appointed by the Regional Director as Coordinator of Actions, whose competences are extended at the following levels: Regional Departments of Primary and Secondary Education, Departments of Primary and Secondary Education, school units and local society. The Coordinators cooperate with and are assisted by the Heads of Scientific and Pedagogical Guidance for Primary and Secondary Education, the Directors of Primary and Secondary Education, School Consultants of all specialties, the Heads of Counseling Service Offices for Youth and the Headmasters of School Units, in order to implement actions for the prevention and addressing of incidents of violence and bullying. Moreover, they cooperate with the Coordinators of all Regional Departments of Education and regularly inform the Regional Director and the Members of the Steering Committee of the Observatory on their actions.

**The Directors/Heads of school units, Teachers' Associations and the teachers**, in order to create conditions of peaceful co-existence among students in the school, cooperate with and are assisted by –inter alia- the Coordinators of Prevention Actions, with a view to designing and implementing actions in schools that will meet the needs of each school unit.

In every School Unit the objective is the better use of all actions and tools offered by the Ministry of Education as well as the local support networks for the prevention of violence and bullying in schools. The ultimate goal is the education of students about the ways they will effectively protect themselves through a critical thinking and approach to any form of violent behaviour and their involvement in seeking a peaceful resolution of conflicts in schools. The incidents of school violence and bullying, when the specificities of each individual incident allow, should be addressed within the school unit. This is the reason why, by decision of the Teachers' Association, a teacher is designated as responsible for issues of

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<sup>12</sup> Based on Circular No.195630/Γ1/19.12.2013 of the Ministry of Education

school violence and bullying in every school unit.

***Further actions for the elimination of corporal punishment***

During the years 2013-2014, a series of in-school trainings have been organized for teachers by the GSEE Center for Education Policy Development. In this context, training and awareness raising actions for teachers were organized, throughout the country, on the early identification and intervention by the school in cases when a student suffers any form of domestic violence, including corporal punishment of children.

Finally, it's worth mentioning that the Department of Mental Health and Social Welfare of the Institute of Child Health, within the framework of the Project «Comprehensive Approach for the Investigation, Identification and Management of Child Abuse and Neglect», develops a ***National Protocol of Management, Identification and Investigation of Child Abuse and Neglect for professionals***, who, inter alia, are trained to understand when corporal punishment is a form of corporal abuse and to meet any immediate need for intervention to such incidents.

**Conclusion**

It is clear that during the last 10 years the situation in Greece **has changed radically**, both **in terms of legislation and in terms of substantial measures**, through the introduction of new legislation, the adoption of relevant initiatives and the county's compliance in general with **the explicit and full prohibition of corporal punishment of children**.

## **4. Collective Complaint 30/2005 “Marangopoulos Foundation for Human Rights v. Greece”**

### **BACKGROUND**

In May 2005, collective complaint 30/2005 was lodged with the Secretariat of the Council of Europe by the international non-governmental organization «Marangopoulos Foundation for Human Rights» concerning the violation of articles 2 para.4, 3 para.1 & 2 and article 11 of the ESC by Greece, that guarantee the right to just conditions of work, safe and healthy working conditions and protection of health, respectively. The main arguments of the complaint are (a) that no effective protection is provided for the workers in the DEH lignite mines, since the legislation does not provide for reduced working hours or additional paid leave and (b) the negative impact of lignite mining operations on the environment and the health of workers and inhabitants. The complaint was declared admissible and was examined on the merits by the European Committee of Social Rights, which submitted its Report to the Committee of Ministers. The Committee of Ministers discussed the case and adopted a Resolution.

### **A. LEGISLATION**

#### **(1) ENVIRONMENTAL LEGISLATION**

Greece has a developed set of rules of law for the protection of the environment. Both the provisions at Constitutional level (article 24) as well as at EU Law level on the subject constitute the primary legal basis of this legislative framework. The main national law on environmental protection is Act No.1650/1986 (O.G.160/A/1986), as later amended especially by Act No.3010/02 (O.G.91/A/2002) and by Act No.4014/11 (O.G.209A/2011), but also by the regulatory provisions recently adopted pursuant to Act No.4014/11 (Ministerial Decision No1958/12 (O.G.21/B), Joint Ministerial Decision No21398/2012 (O.G.140/B), MD No48953/2012 (O.G.2703/B), MD No167563/2013 (O.G.964/B), MD No1649/45/15/01/2014 (O.G.45/B), MD No170225/2014 (O.G.135/B) etc. Moreover, for its full implementation, Act No.4014/11 provides for other regulatory provisions too that are expected to be issued.

In the above mentioned regulations, environmental protection issues include a wide range of regulations concerning various areas of the environment (atmosphere, water, soil, nature-landscape, specific issues such as hazardous substances, wastes, noise etc.). With these regulations the protection of all natural and anthropogenic factors and elements is sought that interact with and influence the ecological balance, the quality of life, the health of inhabitants as well as the historical and cultural traditions and aesthetic values.

More specifically, by virtue of the current environmental legislation, the environmental impact assessment and approval of environmental conditions through the relevant Approval Decision play an important role in the effort to protect the environment especially towards prevention. With the Decision on Approval of Environmental Conditions the Administration imposes requirements, conditions and restrictions on the implementation of a project or activity, especially with regard to location, size, type, technology used and technical characteristics in general of the planned unit/project, i.e. information relating to and affecting the natural as well as the anthropogenic environment. Thus, for example, technology that will be used should be friendly both to the macro-environment as well as to the workplace of specific people on a local scale.

Moreover, it has to be pointed out that the Decision on Approval of Environmental Conditions is a prerequisite for the administrative acts required, where applicable, for the implementation of the project or the activity, in accordance with the relevant provisions.

The environmental licensing process provided for by the relevant environmental provisions (prior to the final licensing of the various projects or activities) is more demanding for large scale activities, such as the lignite mining activities covered by the Marangopoulos Foundation complaint to the EU.

Lignite mining activities, the environmental licensing of which falls within the area of competence of the Ministry of Environment, Energy and Climate Change, fall under subcategory A1 of the 5<sup>th</sup> group of projects and activities (mining and relevant activities), according to the classification of public and private projects and activities in categories and subcategories, under Article 1, para.4 of Act No.4014/2011, mentioned in Annex V of M.D. No1958/13-01-2012 (O.G.21B/2012), as aa1: «Mining of solid energy minerals and energy minerals exploration drilling».

In this context, the Ministry of Environment has, to date, approved/ amended and renewed the environmental conditions for large scale lignite mines in various areas of the country (Regional Units of Arcadia, Kozani and Florina). The approved environmental conditions for the operation of lignite mines clearly aim at both protecting the ecosystem and the anthropogenic environment of the areas around lignite mines and responding in the most rational way possible to the impact of the continuous operation of the said mining activities on the environment.

According to the above, environmental legislation, in general, together with both the environmental impact assessment and the Decision on the approval of environmental conditions, in particular, for the implementation of various projects and activities in our country, contribute significantly to the protection of both the wider environment that affects the general population of the country as well as the working environment.

## **(2) LABOUR LEGISLATION**

(a) The *National Occupational Labour Collective Agreement for Blue Collar Workers of Mines and Lignite Mines dated 26-7-2011* was the last Collective Labour Arrangement for **workers in lignite mines**, the signatories of which were, on the one hand, the Greek Mining Enterprises Association and on the other, the National Federation of Workers in Mines, Lignite Mines and Quarries. The above Labour Collective Agreement had not been declared mandatory, had been in force from 1-1-2011 till 31-12-2013 and was extended for three additional months under article 2 of Cabinet Decree 6/12 (O.G.38/A/2012).

The said LCA set the duration of a working week at 40 hours and defined as holiday the 4<sup>th</sup> of December, date of commemoration of Saint Barbara, the patron saint of miners, while it provided for the granting of an unhealthy work allowance at a rate of 12% and 17%, depending on the category of the worker. Moreover, the contracting employers were required to provide, at their own expense, personal protective equipment that employees have only the right of use while the ownership remains with the employer.

The last Labour Collective Arrangement for **earth drillers/operators/assistants of excavating and lifting machines for mines and lignite mines** throughout the country was the LCA dated 30-3-2011, which had not been declared mandatory while its signatories were, on the one hand, the National Federation of Operators Train Drivers and Earth Drillers and, on the other, the Greek Mining Enterprises Association, the Hellenic Federation of Enterprises (SEV)

and the Federation of Industries of Northern Greece. The said LCA entered into force from 1-1-2011 up to 31-12-2013 and was extended for three additional months under article 2 of Cabinet Decree 6/12 (O.G.38/A/2012).

The said LCA set the duration of a working week at 40 hours for a five-day working week and defined as holiday the 4<sup>th</sup> of December, date of commemoration of Saint Barbara, patron saint of miners. It also provided for the granting of an allowance for special working conditions at a rate of 12% and 17%. Moreover, with regard to health and safety at work, it provided for the supply of pharmaceutical products in the workplace, personal protective equipment and milk at the employers' expense.

#### **(b) New Regulation for Mining and Quarrying Works**

All mining activities of DEH are in full compliance with the new updated Regulation for Mining and Quarrying Works (KMLE), issued in June 2011 by virtue of Ministerial Decision 2223/ O.G. B'1227/ 14.06.2011. This is a comprehensive text that incorporates all legislation on the operation of mines and quarries in the country which, on the one hand, is in line with the latest developments in the relevant European and national law and on the other, meets modern technological requirements.

It aims at establishing rules relating to rational activity, safety of workers, inhabitants and environment, mineral identification or exploitation or processing operations and the respective restoration works of all mine or quarry sites.

## **B. MEASURES – ACTIVITIES**

### **Mining activities and environmental inspection**

For the period from 1-1-12 onwards, we would like to inform you of the following new data:

(A) From 1-1-2016 the existing steam electric stations (SES) at Kozani, Florina and Arkadia (they are installed at lignite mining areas and are lignite-fired plants) are required to comply with the **new stricter emission limits of gaseous pollutants** (particles, sulphur dioxide, oxides of nitrogen) set by the new European Directive 2010/75/EU (replacing Directive 2008/1/EU and from 1-1-2016 replacing Directive 2001/80/EC) on industrial emissions (integrated pollution prevention and control) or strictly observe the Transitional National Emission Reduction Plan (prepared in accordance with article 32 of the above mentioned Directive and approved by the European Commission) provided that these stations have been included in it. The new Ptolemaida SES Unit V, as a new installation, the construction of which is scheduled and for which a permit as lignite-fired plant with anti-fouling technology is granted (desulphurization system, electrostatic filters), is required at start-up to comply with the new limits according to Directive 2010/75/EU.

(B) At Agios Dimitrios SES Units a desulphurization system (**anti-pollution technology**) is scheduled to be installed. At Megalopolis SES Units III, IV such a system has already been functioning properly since 2013 while at Melitis SES it was already functioning before 2012. All lignite-fired stations (SES) are equipped with electrostatic filters (anti-pollution technology) which are being replaced according to the Best Available Techniques (for example at Agios Dimitrios SES Units they have already been replaced before 2012) so that the emission limits of gaseous pollutants established by the European Commission are met for their performance.

(C) From 1-1-2016, Kardias and Amindeio SES Units will be set at **restricted mode of operation** (17.500 running hours until 31-12-2023), in accordance with article 33 of Directive 2010/75/EU.

(D) Ptolemaida SES Unit I **has been shut down** (already before 2012) while Megalopolis SES Units I and II have already been shut down since 2013. Similar decision has been taken also for LIPTOL SES Units (implementation from 2014). Moreover, Ptolemaida SES Unit II is gradually set at stand-by mode (from 2014).

(E) The construction of Megalopolis SES natural gas-fired Unit V is nearing its completion.

(F) Already since 2011 the limits set at the National Emission Reduction Plan are met (most lignite-fired units are included in the plan).

(G) The **air quality** at lignite mining areas, where the lignite-fired plants of the country are also located, **is monitored** through a network of 3 stations in the Prefecture of Arcadia and 9 stations in the Prefectures of Kozani and Florina. Already since May 2014, a Committee has been established by jointly competent Units of the Ministry of Environment and of DEH SA (owner of lignite mines and lignite-fired SES), in order to coordinate the management of urgent environmental issues (emergency measures when emission limit values are exceeded) at the above mentioned areas.

Finally, it is worth mentioning that in accordance with document No.125522/3851/28.11.2014 of Kozani Department of Public Health and Social Care, the inhabitants of several settlements that were or are near DEH lignite mining areas have been relocated or are under relocation.

Moreover, a Centre for the Environment has been established and operates in the region of Ptolemaida that has installed and monitors the operation of air pollution measuring stations at specific locations of Kozani Regional Unit in order to inform citizens and seek the immediate intervention of the authorities in case air pollution thresholds are exceeded.

**We would like to point out that all the above measures are progressively improving the air quality in the lignite mining areas in question.**

#### **MEASURES AND ACTIVITIES TAKEN BY THE DEH**

##### **--- Health and Safety**

The DEH Group approaches its workers' health and safety in line with its health and safety and accident prevention policy which covers, inter alia, the following activities:

- Provision of services relating to Occupational Medicine.
- Provision of services relating to Security Technicians, coordinating and supporting their work.
- Workplace inspections relating to health and safety issues.
- Preparation of risk assessment studies.
- Performance of measurements of harmful factors.
- Drawing up technical specifications and technical evaluation of work safety and fire protection equipment.
- Support services on issues relating to hazardous waste management.
- Record and statistical analysis of occupational accidents.
- Production of training material and support services on issues relating to health and safety training.

- Design and implementation of exercises on emergency response issues.
- Support on issues relating to Emergency and Civil Protection Policy Planning.

### **1. Certified Systems to OHSAS 18001:2007 Standard**

- In the recent years, DEH implements a program on the development and certification of Occupational Health and Safety Management Systems in accordance with OHSAS 18001:2007 standard at its thermal power stations, in order to safeguard occupational health and safety. Today already the power stations at Komotini, Meliti, Agios Dimitrios, Megalopoli B, Chania, Atherinolakos, Aminteo, Aliveri and Soroni of Rhodes Island are equipped with certified systems according to OHSAS 18001:2007 Standard. The certification of the said Systems is under way at the power stations of Megalopolis A, Amindeo and Lavrio.

- The Southern Field Mine and the Division of Megalopolis Lignite Centre are under certification process according to OHSAS 18001 Standard for the Occupational Health and Safety Management Systems they apply. The certification is expected to be issued in 2014.

### **2. Important distinctions of DEH S.A. on health and safety issues**

As a culmination of its systematic efforts in health and safety issues, DEH S.A. won four major distinctions – two golden and two silver awards – at the **Health & Safety Awards**, that took place on 30.9.2014, in Athens under the auspices of the SEV and the honorary support of the European Parliament and the *Hellenic Institute for Occupational Health and Safety* (ELINIAE). These four awards illustrate in the best way that the respect for the Human Being, the Society and the Environment constitutes the key strategic objective and the cornerstone of Corporate Social Responsibility for the companies of DEH Group.

#### **--- Health Protection**

In cooperation with the State, and in addition to the measures referred to in the 23<sup>rd</sup> Greek Report on the ESC (article 11 para. 3), the following measures/actions have been or are being implemented by DEH:

#### **1. Replacing old Units with new more environmentally friendly units of modern technology and higher performance**

##### **1.1 Scrapping of old units**

- Shut down of Ptolemaida SES Unit I, by decision No.D5/HL/A/F7/161/3800/09.03.2011 of the Ministry of Environment).
- Definite scrapping of Megalopolis A' SES Units I and II, by Decision of the Regulatory Authority for Energy (RAE) No. O-57886/18.03.2014 (they have been shut down since 2012).
- Definite scrapping of LIPTOL SES Units I and II, by Decision No RAE/O-57886/18.03.2014 (they have been shut down since 2013).
- Shut down of Ptolemaida SES Unit II by DEH (RAE is considering the possibility of setting the unit at stand-by mode for emergency purposes).



- Setting at stand-by mode for emergency purposes till the end of 2015 the Aliveri SES Units III and IV and Lavrio SES Unit I (RAE O-59110/16.07.2014). At the end of 2015 the said Units will be definitely scrapped.

According to DEH Operational Planning, all Ptolemaida SES Units will gradually be shut down till the end of 2015.

### **1.2 Construction of new modern units**

- On August 12<sup>th</sup> 2013, Aliveri SES natural gas-fired combined cycle Unit V, of 416,95 MW net capacity and 58,4% nominal degree of efficiency started operating commercially. In February 2014 the Unit was registered with the Units' Register and the Dispatchable Units' Register kept by the Independent Power Transmission Operator ADMIE.

- The construction of Megalopoli B' SES natural gas-fired combined cycle Unit V, of 811 MW net capacity is in progress. The Unit is expected to start operating commercially end of 2014.

- On the 9th of March 2013 a Contract was signed for the design and construction of a new steam electric pulverized lignite-fired Unit at Ptolemaida (Unit V), of 660 MW gross capacity, with the capability to supply 140 MWth for district heating purposes. For this Unit (that will replace the existing Ptolemaida SES) provision is made for the installation of CO<sub>2</sub> capture and compression equipment, depending on the outcome of the assessment of Carbon Capture readiness.

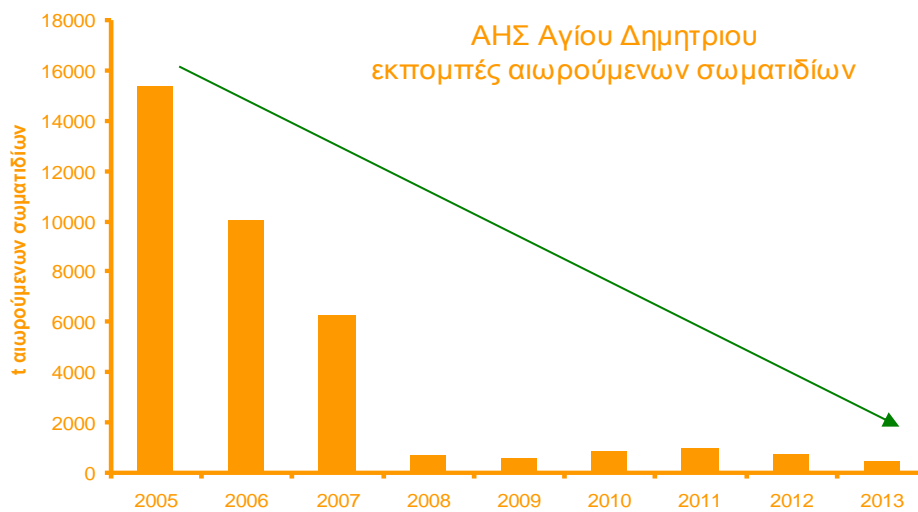
- In 2013 the Decision on Approval of Environmental Conditions was issued for the construction and operation of a new thermal low sulfur oil-fired and natural gas-fired plant of 115,439 MW total net capacity at Piso Kambos and Plaka Steni locations of the Municipality of Southern Rhodes.

- Regarding the island of Crete, priority is given to the design and implementation of the project that will interconnect the island's electricity system to the mainland grid, in accordance with the final Decisions of the State on the island's long-term energy plan.

- Regarding the non-interconnected system, apart from Crete and Rhodes, provision has been made for the gradual inclusion of new smaller thermal units of almost 100 MW total capacity in the remaining isolated small grids together with the interconnection of Cyclades which is of utmost importance both in terms of security of supply as well as in terms of cost effectiveness.

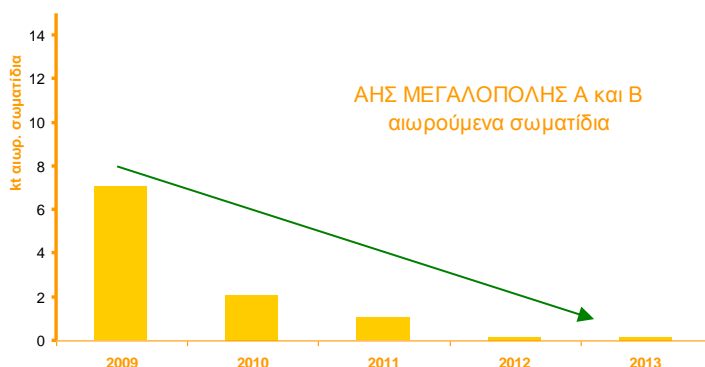
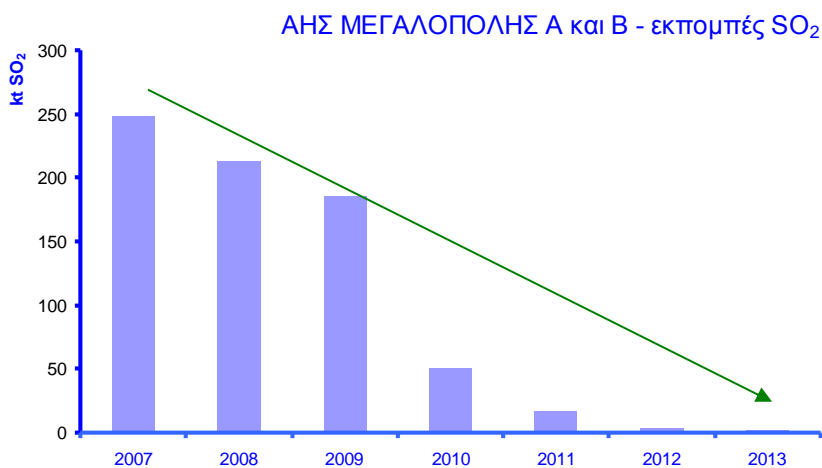
## **2. Compliance with the existing environmental legislation on Large Combustion Plants (Directive 2001/80/EC and Directive IPPC-2008/01/EC)**

All DEH thermal plants comply with the provisions of the Directive on Large Combustion Plants (2001/80/EC) and Directive IPPC (2008/01/EC). In addition to the works for the reduction of dust, referred to in the last report of the country (installation of new electrostatic filters at Agios Dimitrios SES Units I-IV), which resulted in significant reductions in dust emissions (see Chart 1), in 2012 the installation and operation of flue gas desulphurization system was completed at Megalopolis A' SES Unit III.



*Chart 1: Reduction in particles emission at Agios Dimitrios SES*

The installation and operation of flue gas desulphurization system at Megalopolis A' SES Unit III, of 83 million Euros contract price, together with the improved operation of the desulphurization system at Megalopolis B' SES Unit V, in combination with the shutdown of Megalopolis A' SES Units I and II (2011), resulted, on the one hand, in the reduction in sulphur dioxide emissions (SO<sub>2</sub>) by 99,2% compared to 2007 and, on the other, in the further reduction in particles emission, as presented in the following charts:



*Charts 2 and 3:  
Reduction in sulphur dioxide emissions and particles emission at Megalopolis SESs*

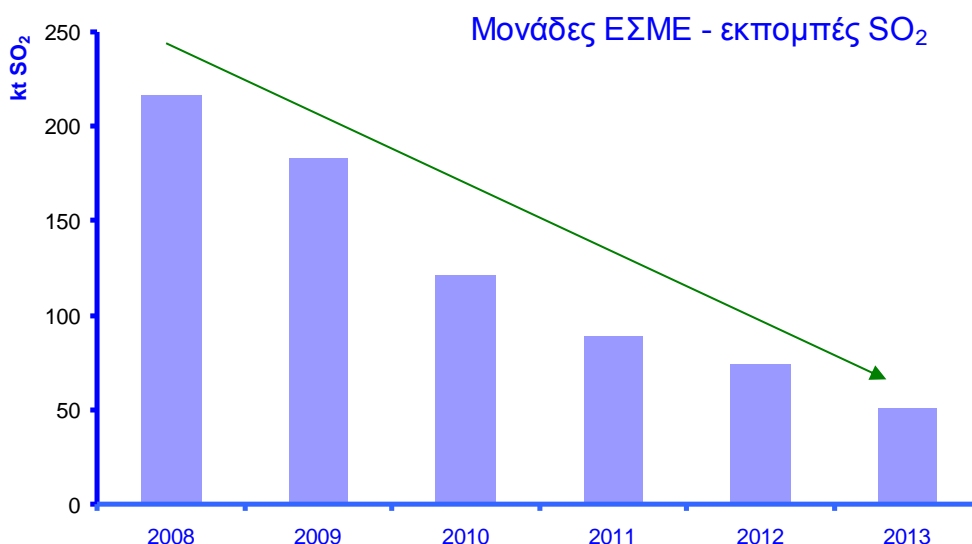
It has to be noted that from March 2013 the full and continuous operation of flue gas desulphurization system at Megalopolis SES Unit III was secured following the final receipt of relevant projects.

The considerable improvement in the ambient air quality in the region of Megalopolis SES is the consequence of the drastic reduction in SO<sub>2</sub> and particles emission.

Moreover, at Agios Dimitrios SES Unit III a pilot implementation of dry multiple injection flue gas desulphurization process started in 2012. In 2013 the trial operation of this pilot implementation continued at Agios Dimitrios SES Unit III with successful results. In 2014 the pilot implementation is expected to be completed.

In 2012 a specialized company has been commissioned to carry out a preliminary study on the reduction in SO<sub>2</sub> emissions in lignite-fired Units in Western Macedonia (Agios Dimitrios SES Units I-IV and Amindeo SES Units I-II). The study was finalized in 2013.

With the above mentioned projects, DEH's facilities and the country fully comply with the provisions of the National Emission Reduction Plan (NERP – approval by virtue of Joint Ministerial Decision 33437/1904/E103, O.G. B' 1634/14.08.2008), as provided for by Directive 2001/80/EC.



Moreover, pursuant to Directive IPPC, the new Decisions on Approval of Environmental Conditions have been issued concerning Amindeo, Kardias, Ptolemaida and LIPTOL SESs and the Lignite Center of Western Macedonia (November 2011).

Today, all DEH production facilities are equipped with approved Decisions on Approval of Environmental Conditions.

The compulsory land acquisition process for Klitos Settlement has already been finalized since 2010. The inhabitants have already been removed and the Southern Field lignite mine spread over the area of the former settlement.

### 3. Compliance with the new environmental legislation on industrial emissions (Directive 2010/75/EC)

Greece prepared the Transitional National Emission Reduction Plan (TNERP) and forwarded it for approval by the European Commission, concerning Agios Dimitrios SES Units I-V, Kardias SES Units III and IV, Megalopolis A SES Unit III, Megalopolis B SES Unit IV and Meliti SES Unit I, pursuant to article 32 of the New Directive 2010/75/EU. The TNERP was approved by the European Commission on the 26<sup>th</sup> of November 2013. In December 2013, DEH filed an application to the Ministry of Environment concerning certain limited changes to the TNERP, together with a declaration that it will make use of Article 33 of the Directive on limited life time derogation concerning certain Units. After the Ministry accepted the proposed changes, the revised TNERP was forwarded again to the European Commission for approval on the 18<sup>th</sup> of March 2014. The revised TNERP was approved by the European Commission by virtue of Decision C (2014)4533final/7-7-2014.

In the end, Agios Dimitrios, Meliti, Megalopolis A' and B' SESs were included in the **TNERP** while both Amindeo SES Units as well as four Kardias SES Units are subject to a limited life time derogation.

In the context of TNERP, DEH has defined its policy by outlining the way lignite units will operate in the set time frame, the required actions and environmental projects with their implementation schedule, combined with the planning of their long-term maintenance.

Unit	Target	
	Reduction in NOx emissions <200mg/Nm <sup>3</sup>	Reduction in SO <sub>2</sub> emissions <200mg/Nm <sup>3</sup>
Agios Dimitrios I	Within the Second Semester of 2015	Within the Second Semester of 2015
Agios Dimitrios II	Within the First Semester of 2016	Within the First Semester of 2016
Agios Dimitrios III	Within the Second Semester of 2016	Within the Second Semester of 2014
Agios Dimitrios IV	Within the First Semester of 2016	Within the First Semester of 2016
Agios Dimitrios V	Within the First Semester of 2015	Within the Second Semester of 2017
Megalopolis IV	Within the Second Semester of 2015	-

In October 2013 DEH decided:

- the implementation of dry flue gas desulphurization projects at Agios Dimitrios SES Units I-IV (following the positive test results at Unit III),
- the implementation of wet flue gas desulphurization project at Agios Dimitrios SES Unit V, and
- the implementation of projects for the reduction in NOx emissions, of a total budget of €76 million by applying (a) extensive primary measures at Agios Dimitrios SES Units I-IV (interventions in the fuel preparation system, replacing burners, interventions in the distribution of combustion air in the boiler) and (b) limited primary measures (without replacing burners) at Agios Dimitrios SES Unit V and Megalopolis B SES.

Initially, following the international tender offer launched on 7.10.2013, a contract was signed on 24.6.2014 concerning the project «Upgrading the boiler unit of Agios Dimitrios SES Unit V to reduce NOx emissions by applying primary measures». In August 2014 the tender offer for the project «Upgrading boiler units of Agios Dimitrios SES Units I and II to reduce NOx emissions by primary measures» was launched (at a budget of € 29,5 million).

As mentioned above, pursuant to article 33 of Directive 2010/75/EC, Kardias SES Units I-IV and Amindeo SES Units I-II were subject to limited life time derogation (17.500 running hours from 01.01.2016 to 31.12.2023).

#### **4. Certified Systems in accordance with ISO 14001:2004 and OHSAS 18001:2007**

- DEH has certified Environmental Management Systems in accordance with ISO 14001:2004 at the Lignite Center in Western Macedonia and the following Stations, that produce 86% (2013) of electricity generated by DEH: SESs of Komotini, Meliti, Amindeo, Kardias, Agios Dimitrios, Lavrio, Megalopolis A' and B', Chania, Atherinolakos, as well as the HPPs of Nestos, Platanovrisi, Pournari I and II, Piges Aou, Polifitou, Sfikia and Asomaton, Agra and Edesseou, Kremaston, Kastrakiou and Stratou I and Ladona.
- Moreover, at Megalopolis Lignite Center, in addition to the Certified Environmental Management System, the Energy Management System implementation process is under way, in accordance with ISO 50001:2011.
- Finally, it has to be noted that in December 2012, DEH was awarded the 1<sup>st</sup> prize for Organization and Management at «Greek Business Awards for the Environment 2011-2012» of the European Commission. DEH was awarded for its environmental performance and in particular the Development, Implementation and Certification of Environmental Management Systems at its thermal and Hydro Power Plants, in accordance with ISO 14001:2004 standard.

#### **5. New Hydropower Projects**

DEH's environmental strategy includes the development of low emission technologies and significant investments in the increase of the share of electricity generated by exploiting the hydropower potential of the country and developing projects on renewable energy sources (through DEH Renewables S.A, a subsidiary of DEH, and in cooperation with other private

investors), such as wind farms, small hydropower stations, photovoltaic parks, biomass and geothermal plants.

The Corporation, exploiting the natural relief of our country, constructs dams and creates artificial lakes, exploiting the hydropower potential of the country respecting the supply and demand balance at the basin level of every water district. Today, DEH owns and manages 15 significant Hydroelectric Power Plants in various regions of the country.

It has to be noted that the hydroelectric stations of Sfikia and Thisavros at the rivers Aliakmonas and Nestos respectively, act as reversible-pumping stations. They store water in their reservoirs by pumping at hours of low demand, and the water is released to produce electric power during hours of high demand.

In particular with respect to the development of hydroelectric power plants we would like to note the following:

- Ilarionas HPP (the installed capacity of Ilarionas hydroelectric project is 157 MW, with estimated net electricity generation of 330 GWh). Works at the substation site and the riverbed area downstream of the dam have been completed. Both units have been operating since 3.7.2014 the first one and 7.6.2014 the second one, in accordance with the schedule submitted by DEH/DYHP and approved by the National System.
- Metsovitiko HPP (29 MW). Due to delays in tender procedures, the unit is expected to start operating commercially in 2018.

## **5. Collective Complaint “*General Federation of Employees of the National Electric Power Corporation (GENOP-DEI) and Confederation of Greek Civil Servants’ Trade Unions (ADEDY) v. Greece*”**

### **BACKGROUND**

In February 2011, collective complaint 66/2011 of the General Federation of Employees of the National Electric Power Corporation (GENOP-DEI) and the ADEDY was lodged with the Secretariat of the Council of Europe versus Greece, concerning the violation of article 4, para.4 of the European Social Charter on the right to fair remuneration, **on the grounds that article 17, para.5 of Act No.3899/2010** («Urgent measures for the implementation of the support program for the Greek economy») **does not provide for a reasonable period of notice or compensation** in cases when an employment contract, defined as «permanent» based on the above mentioned Act, is terminated during the probationary period that lasts for one year, under the same Act. The complaint was declared admissible and examined on the merits by the European Committee of Social Rights, which sent its Report to the Committee of Ministers. The Committee of Ministers, taking into account that the measures constituting a violation of the 1961 Charter are of a provisional nature and that they will be revoked as soon as the economic situation of the country would allow it, adopted a Resolution and not a Recommendation for Greece.

### **LEGISLATION**

A) Termination with notice of the employment contract of private employees bound by a dependent working relationship of indefinite period of time:

Subpara.IA.12, para.IA, article 1 of Act No.4093/2012 «**Approval of the Medium Term Fiscal Strategy Plan 2013-2016-Urgent Implementation Measures of Act No.4046/2012 and the Medium Term Fiscal Strategy Framework 2013-2016**» (A’222), as amended by paras.9 and 10 of article 10 of Legislative Act dated 19-11-2012 (A’229), ratified by paras.9 and 10, article 34 of Act No.4111/2013 «**Pension provisions, amendments of Law 4093/2012, ratification of the Act of Legislative Content «Approval of the Draft Agreements Amending the Master Financial Assistance Facility Agreement between the European Financial Stability Facility (E.F.S.F.), the Hellenic Republic, the Hellenic Financial Stability Fund (H.F.S.F.) and the Bank of Greece, under the title "Master Financial Assistance Facility Agreement", of the Financial Assistance Facility Agreement between the European Financial Stability Facility (E.F.S.F.), the Hellenic Republic and the Bank of Greece, under the title "PSI LM Facility Agreement" and of the Financial Assistance Facility Agreement between the European Financial Stability Facility (E.F.S.F.), the Hellenic Republic and the Bank of Greece, under the title "Bond Interest Facility", provision of authorizations for the signature of Agreements**» and other provisions of urgent nature» (A’18), regulates issues relating to termination of contracts or employment relationships of indefinite period of time for private employees.

The said regulations, inter alia, aim at promoting labour market flexibility with a view to improving the competitiveness of the enterprises and removing the barriers to labour mobility so that its possible increase may lead to reduction in unemployment, giving thus

**the economy the boost it needs.**

Case 1, sub-para.IA.12, para.IA, article 1 of Act No.4093/2012, as amended by para.9, article 10 of Legislative Act of 19-11-2012, which was ratified by para.9, article 34 of Act No.4111/2013 and the publication of the present Act (12-11-2012) replace article 1 of Act No.2112/1920 (A` 67), as amended and in force by section B`, para.2, article 74 of Act No.3863/2010 (A` 115), as amended by section b` para.5, article 17 of Act No. 3899/2010 (A` 212), as follows:

**«1. An employment contract of a private employee bound by an employment relationship of indefinite period of time, the duration of which exceeds twelve (12) months, cannot be terminated without the prior written notice by the employer which shall apply from the day following its communication to the worker under the following terms:**

a) For employees having completed twelve (12) months to two (2) years of service, a notice of one (1) month prior to dismissal is required.

b) For employees having completed two (2) to five (5) years of service, a notice of two (2) months prior to dismissal is required.

c) For employees having completed five (5) to ten (10) years of service, a notice of three (3) months prior to dismissal is required.

d) For employees having completed ten (10) years or more of service, a notice of four (4) months prior to dismissal is required.

The employer, who notifies the private employee in writing, in accordance with the above, shall pay the dismissed person half the amount of compensation that would pay in case of termination without notice».

Furthermore, in accordance with Interpretative Circular No 26352/839/28-11-2012 of the Ministry of Labour, Social Security and Welfare (A.D.A. B4STL-3PP), the above mentioned provision determines exactly the commencement of the written notice, i.e. **from the date following its communication to the worker**. The calculation of the notice period, therefore, starts from the date following its communication to the worker (article 241 of the C.C.) and ends on the date of expiry of the notice period resulting to the termination of the employment relationship.

**B) Termination of the employment contract of blue collar workers bound by a dependent working relationship of indefinite period of time:**

Para.1, article 1 of Royal Decree No.16/18 July 1920 «On the extension of Act No. 2112 also to workers, technicians and servants» (O.G.158A´) provides for the following: «The obligation under Act No.2112 concerning the termination of an employment contract for private employees applies hereinafter also to all types of workers, technicians and servants ...».

Moreover, in accordance with article 1 of Act No.3198/1955 on «Amending and supplementing provisions on the termination of an employment relationship» (O.G.98 A´): «Enterprises or undertakings ... may terminate the employment relationship of workers, technicians and servants, but are required to pay them compensation provided for by the Royal Decree of 16/18 July 1920, in case of termination of the employment contract without notice. In these cases no notice is allowed...».

**C) Termination of an employment contract during probationary period:**



Para.5<sup>a</sup>, article 17 of Act No.3899/2010 «Urgent measures for the implementation of the support program for the Greek economy» (A' 212) stipulates the following: «Clause A is added to para. 2, article 74 of Act No.3863/2010 as follows: «A. Employment under a contract of indefinite duration is considered as employment under probation period for the first twelve (12) months after the entry into force of such contract, which can be terminated without notice and without compensation for dismissal, unless otherwise agreed between the parties».

The above mentioned provision applies to every termination of an employment contract of a blue or white collar worker who has not completed twelve months of employment with the same employer.

In conclusion, we would like to point out that all the aforementioned regulations are part of the structural measures taken to amend the operation of the labour market, in order to **enhance the competitiveness of Greek enterprises**, within the framework of the country's grave financial situation.

Finally, we would like to inform you that from the 5<sup>th</sup> of February 2013 to date, no legislative or other measures have been taken relating to the issue under consideration.

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

### **BACKGROUND**

In February 2011, collective complaint 66/2011 of the General Federation of Employees of the National Electric Power Corporation (GENOP-DEI) and the ADEDY was lodged with the Secretariat of the Council of Europe. The complaint concerned the violation of the following articles of the ESC: 4 (the right to fair working terms), 7 (the right of young persons to work), 10 (the right to vocational training) and 12 (the right to social security) based on the provisions of Act No.3863/2010, «New social security system and relevant provisions, arrangements regarding labour relations», that refer to the new-entrants into the labour market aged under 25, but also to persons aged 15 to 18 who are recruited under special apprenticeship contracts. The complaint was declared admissible and examined on the merits by the European Committee of Social Rights, which sent its Report to the Committee of Ministers. The Committee of Ministers, taking into account that the measures constituting a violation of the 1961 Charter are of a provisional nature and that they will be revoked as soon as the economic situation of the country would allow it, adopted a Resolution and not a Recommendation for Greece.

### **LEGISLATION**

With regard to the legislation in question, i.e. Act No.3863/2010 «New social security system and relevant provisions, arrangements regarding labour relations», the provisions of which refer to the new-entrants into the labour market aged under 25, but also to persons aged 15 to 18 recruited under special apprenticeship contracts, we would like to inform you of the following:

A) Article 1, para.1 of Cabinet Decree No6 of 28-2-2012 on the “Regulation of issues concerning the implementation of Article 1, para.6 of Act No. 4046/2012” stipulates that «from 14-2-2012... wage and salary thresholds, set by the current National General Labour Collective Agreement, dated 15-7-2010, as these were provided for and in force on 1-1-2012, are reduced by 22%. From 14-2-2012 [...] wage and salary thresholds, set by the current National General Labour Collective Agreement, dated 15-7-2010, as these were provided for and in force on 1-1-2012, are reduced by 32%, for young persons aged under 25. The reduced by 32% wage and salary thresholds of the previous section apply also to the apprentices mentioned in article 74, para.9 of Act No.3863/2010. Article 74, para.8 of Act No.3863/2010, article 43 of Act N. 3986/2011 (A’ 152) as well as any other regulation which is contrary to the provisions of this paragraph, are abolished».

B) Subpara.IA.11 of Act No.4093/12 (O.G.222/A/12-11-2012) provides that “for white collar workers, under 25, the minimum salary is set at 510,95 Euros and for blue collar workers, under 25, the minimum wage is set at 26,18 Euros”. Moreover, it stipulates that “the above

mentioned minimum salary for white collar workers under 25 increases by 10% for one 3-year period of service and for service offered for 3 years and above, while the minimum wage of blue collar workers under 25 ευρώ increases by 5% for every 3-year period of service and up to two 3-year periods, i.e. by 10% in total for 6 or more years of service.”

We would like to point out that, within the framework of the severe economic crisis in Greece, **the above regulations aim at improving the competitiveness of the Greek Economy** by means of taking structural measures for the operation of the labour market, especially with regard **to determining wages through collective bargaining, and, generally, reducing the labour cost and combating unemployment which is intensified by the financial crisis.**

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

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### **BACKGROUND**

In July 2011, collective complaint 72/2011 was lodged with the Secretariat of the Council of Europe by the International Federation for Human Rights against Greece, concerning the violation of article 11 of the ESC that guarantees the right to protection of health. The complainant organisation alleged that there was a violation of article 11 of the ESC, due to the dumping of waste in the river Asopos and the subsequent harmful effects of large scale environmental pollution on the health of the people concerned. The complaint was declared admissible and was examined on the merits by the European Committee of Social Rights. According to the Committee’s Report, there is a violation of article 11 paras.1, 2 and 3 of the ESC that guarantee the right to protection of health combined with the right to a healthy environment. The Committee forwarded its Report to the Committee of Ministers, which adopted a Resolution.

### **A. Article 11, paras.1 & 3 of the ESC**

#### **- 1. Acknowledgement by the Greek Authorities of the seriousness of pollution**

**1.1.** The pollution problem in the river Asopos has been a source of systematic concern for the Environmental Services of the Ministry of Environment, Spatial Planning and Public Works (YPEHODE) – Ministry of Environment, Energy and Climate Change (YPEKA) since 1995, when the first actions were taken following the signing of a Cooperation Protocol between the YPEHODE, the Prefectures of Boeotia and Eastern Attica and the Association of Municipalities and Communities of Asopos River in the form of a consortium, with a view to implementing emergency actions for the protection and remediation of Asopos River, the preparation of a study by the National Technical University (EMP) on the establishment and operation of a Central Unit for the treatment of industrial waste from the area of Asopos River and urban waste-water from Avlona, which was finalized in 1998, and the construction and operation of a sewage treatment plant at Oinofyta-Schimatari in 2000.

**1.2** In 2007, the YPEHODE declared the issue of Asopos River as a case requiring “**Special National Intervention**” and the Special Environmental Inspectors’ Office (EYEP) was mandated to intensify the conduct of supervisions and inspections in activities in the area. For the period 2004-2012 more than 250 inspections and re-inspections in total were carried out in works and activities in the area.

**1.3** On February the 8<sup>th</sup>, 2010 the “**Project for the Integrated Management of the Environmental Crisis of Asopos**” was presented. This project met long-standing demands by the local community and was developed in close and systematic cooperation with all the bodies and services concerned. The Special Secretariat for the Environment and Energy Inspectorate (EGEPE), in the context of its coordinating role under Act No.3818/2011, together with the General Secretariat for Water of the YPEKA undertook the coordination of actions. This project consisted of measures of immediate implementation and measures of

medium- and long- term outcome that include the establishment of rules, guidelines and procedures, according to which pollution sources will be monitored and industries will be bound to operate, the clear determination of competences among services and the ongoing information of citizens and all stakeholders. These measures are gradually being implemented with the following main objectives:

- safeguarding public health
- reducing and eliminating pollution
- spatial planning of the informal, until today, industrial areas of Oinofyta and Schimatari
- ensuring the implementation of measures.

With a view to intensifying the coordination of actions for the implementation of JMD 20488/2010 and monitoring the implementation progress of the “*Project for the Integrated Management of the Environmental Crisis of Asopos*”, at central and regional level, the EGEPE established and formed a Committee by Decision No. 270/15.02.2012, the main objective of which was the elaboration of proposals and the undertaking of initiatives and actions that resulted in the following proposals:

- Intensifying cooperation between services for the submission of a proposal to the YPEKA the soonest possible concerning the funding of the water supply project.
- Promoting in cooperation with the EYDAP, as a temporary solution, the transfer of liquid pre-treated industrial waste of certain units to the Sewage Treatment Center in Metamorfofi, by applying the appropriate accreditation of receipt-transfer-delivery process.
- Accelerating the establishment and staffing of EYEP’s Section of Sterea Ellada, the headquarters of which are at Oinofyta.
- Taking actions towards competent Services for the immediate resolution of remaining issues concerning the spatial and business planning of concentrations of industrial units in the broader area.

**1.4** In September 2013, Mr. Stavros Kalafatis, Alternate Minister of the Environment, Energy and Climate Change, announced the «**Project for the Integrated Management of Water Bodies in Asopos River Region**». This project by making use of all actions taken to date promotes a comprehensive and sustainable solution of this complex environmental problem based on the following axes:

- Environmental projects for the environmental recovery of the underground aquifer with a view to enriching the aquifer of the region with water of good quality.
- Establishing a reliable mechanism for the disposal of the region’s industrial waste
- Projects for the smooth supply of high quality drinkable water to urban and industrial regions of Tanagra
- Creating an extended, reliable and long-term mechanism to monitor the quality of groundwater in the region.
- Placing emphasis on environmental inspections by establishing a permanent inspection mechanism in the region.

## **- 2. Implementation of existing regulations and programmes**

**2.1** In implementation of the Water Framework Directive 2000/60/EC, the Special Secretariat for Waters completed the elaboration of the “**River Basin Management Plan for the Water District of Eastern Sterea Ellada**” which was approved by virtue of Decision No.

391/08.04.2013 (published in O.G.1004/B/24.04.2013) in order to become the main planning instrument with respect to water resources and ecosystems.

More specifically, the River Basin Management Plan for the Water District of Eastern Sterea Ellada comprises mandatory Programmes of Measures and Programmes for the Monitoring of the status of waters, and contains all data, information and assessments necessary for water protection and management. In particular, towards ensuring the quality of water intended for human consumption, the Programmes of Measures (PoM) comprise Basic Measures for meeting the requirements set out in article 7 of Directive 2000/60/EC with respect to waters used for the abstraction of drinking water, including:

- (a) Measures for ensuring water quality in order to reduce the level of purification treatment required in the production of drinking water;
- (b) Measures for ensuring water quality;
- (c) Measures for abstraction control in surface water and groundwater, and
- (d) Control measures, including the licensing requirement relevant to the artificial enrichment (recharge) of the aquifer.

**2.2** The Special Secretariat for Waters reviewed and promoted the following **institutional measures** that regard the environmental problem of the Asopos River directly or from a broader perspective:

**2.2.1** Joint Ministerial Decision No.20488/19.05.2010 was issued (published in O.G.749 B/31.05.2010) **“Setting Environmental Quality Standards in Asopos river and Emission Limit Values for liquid industrial waste at the Asopos river basin”**, whereby strict qualitative limits are set for both the Asopos river and for the emissions of liquid industrial waste in the area.

- Interpretative Circular under Ref.No.106072/23.08.2010 was issued by the Minister for the Environment, Energy and Climate Change: **“Clarifications on the proper implementation of Joint Ministerial Decision 20488/19.05.2010”** towards an effective and proper implementation of the provisions of the said Joint Ministerial Decision.

**2.2.2** Joint Ministerial Decision No.106253/8.11.2010 was issued (published in O.G.1843/B/24.11.2010) **“Supplementing joint Ministerial Decision No. 19652/1906/1999 on the “Identification of waters affected by pollution caused by nitrates from agricultural sources – List of vulnerable zones, pursuant to paragraphs 1 and 2, respectively, of article 4 of Joint Ministerial Decision No.16190/1335/1997 (O.G. 519) as amended and applicable”** designating Asopos river basin as a Nitrate Vulnerable Zone, to be followed by the establishment and implementation of an appropriate programme of agro-environmental measures, in implementation of the Community Directive on pollution caused by nitrates from agricultural resources.

**2.2.3** Joint Ministerial Decision No.145116 was issued (published in O.G.354/B/8.03.2011) **“Defining measures, conditions and procedures for the reuse of treated liquid waste and**

**other provisions**”, as applicable, in order to promote the utilization of treated liquid waste and thereby the saving of water resources.

2.2.4 Joint Ministerial Decision No. 51354/2641/E103 was issued (published in O.G.1909/B/8.12.2010) **“Setting Environmental Quality Standards (EQS) for the concentrations of certain pollutants and priority substances in surface waters, in compliance with the provisions of directive 2008/105/EC of the European Parliament and the Council of 16 December 2008 “on Environmental Quality Standards (EQS) in the field of water policy, amending and subsequently repealing Council directives 82/176/EEC, 83/513/ EEC, 84/156/EEC, 84/491/EEC and 86/280/EEC and amending Directive 2000/60/EC of the European Parliament and of the Council”, as well as for the concentrations of specific pollutants in inland surface waters and other provisions”** in order to reduce the pollution risk of surface waters and achieve their good chemical and ecological status.

### **2.3 Water supply – Sewage in the Municipalities within the Asopos River Basin, and Irrigation**

2.3.1 In cooperation with EYDAP (Athens Water Supply and Sewerage Company S.A.), the Region, the local Municipal Enterprises for Water Supply and Sewerage (DEYA) and Local Government Organisations, the necessary actions for **safe water delivery** of clean drinking water to inhabitants of the area are under way and the resources necessary to this end have been secured.

More specifically, the Municipalities in the Asopos River Basin area are now supplied with water via facilities secured by EYDAP from the Mornos River aqueduct, while the EYDAP borehole facilities in Mavrosouvala are also being used.

Furthermore the necessary works are being carried out, on the basis of EYDAP studies, for the water supply and the smooth delivery of safe water from Mornos, via the Thebes water treatment plant, to villages in the area (Neochoraki, Elaionas). The Interim Management Authority of the Administrative Region of Sterea Ellada, using appropriations allocated to the Region by the Ministry for the Environment, Energy and Climate Change-YPEKA (Operational Programme “Environment and Sustainable Development 2007-2013”), has secured funding for the relevant works, with the Thebes DEYA being the implementation authority.

Furthermore, YPEKA in cooperation with EYDAP and the Municipality of Tanagra, has been considering an overall and final solution to the water supply problem of the area that can be achieved provided water can be made available from Mornos river and Yliki lake for water supply and irrigation purposes, given the sufficiency of clean water and central network facilities as established under EYDAP records. More specifically, the possibility is explored of the supply of water from Mornos for urban use (water supply to residential settlements within the Municipality of Tanagra and to industrial plants) and from Yliki Lake for environmental recovery of the underground water used for irrigation, as described below.

Under the solution proposed, the inhabitants shall be supplied with safe drinking water and industry shall be facilitated towards meeting the limits and quality parameters set in Joint Ministerial Decision 20488/19.05.2010. The said proposal falls under the Water Management Plans implementation framework.

**2.3.2 Irrigation** for the Asopos river basin areas is from the bodies of groundwater of the district through boreholes and spring water drainage. The bodies of groundwater used for this purpose are the following:

GR0700210: Groundwater body of Thebes-Asopos-Schimatari

GR0700220: Groundwater body of Skourta-Agios Thomas

GR0700230: Groundwater body of Antikyra-Kitheronas

GR0600080: Groundwater body of Northeastern Parnitha

On the basis of available information and the methodology adopted in the Management Plan for River Basins within the Water District of Eastern Sterea Ellada, the groundwater bodies of Skourta-Agios Thomas (GR0700220), Antikyra-Kitheronas (GR0700230) and Northeastern Parnitha (GR0600080) have been classified as being in good chemical status, while the Thebes-Asopos-Schimatari Groundwater Body (GR0700210) has been classified as being in poor chemical status, which is an issue for which a solution is under way through the utilization of a surplus water quantity from Yliki lake.

On the basis of available information and the methodology adopted in the relevant Management Plan, Yliki Lake is classified as being in good ecological and chemical status. Yliki Lake forms part of the water supply system of Athens and is a backup resource for supplying water to Athens to be used only when needed. Presently Yliki lake supplies 50,000,000 m<sup>3</sup>/year for the irrigation of Kopaida valley (not included in Asopos river basin), 20,000 m<sup>3</sup>/day is used for maintaining the required minimum flow at the Yliki Aqueduct and in the last years about 10,000-12,000 m<sup>3</sup>/day is poured to Asopos river bed through the separator of Kremmada.

Such cooperation between the YPEKA and the EYDAP and local authorities involves also the option to supply surplus water from Yliki lake towards environmental recovery of the groundwater used for irrigation in the district of Asopos, given that irrigation with suitable water may contribute to the gradual natural reversal of pollution but also to the remediation of polluted soil ensuring thus the quality of agricultural products.

**2.3.3** In what concerns YPEKA, for the Asopos River Basin area **three (3) projects relevant to waste collection and treatment** have been included in Operational Programme “Environment - Sustainable Development 2007-2013”, of a total budget of 60.0 mil.€, relieving the area from additional contamination pressures and upgrading the quality of waters and the quality of life of inhabitants.

**The first project** (MIS 340060), having a budget of 25.9 mil.€, concerns the design-construction of sewage networks for the residential settlements Dilesi, Plaka Dilesi, their connection to the Oinofyta-Schimatari Waste Treatment Plant (WTP) as well as the design



for the expansion of the existing facilities.

**The second project** (MIS 340211), having a budget of 30.7 mil€, concerns the collection, transport, treatment and disposal of waste for the residential settlements of Markopoulo Oropou, Halkoutsi, Nea Palatia and Avlona in the municipality of Oropos.

**The third project** (MIS 341246) having a budget of 4 mil€, concerns the design-construction of a WTP in Kyriakio township in the Municipality of Livadia.

**2.3.4** Joint Ministerial Decision 20488/19.05.2010 (published in O.G.749 B/31.05.2010) “*Setting Environmental Quality Standards in Asopos river and Emission Limit Values for liquid industrial waste at the Asopos river basin*”, sets strict qualitative limits for both the Asopos river and for the emissions of liquid industrial waste in the area. The **Environmental Terms Approval Decisions (AEPO) for industrial plants** have to specify the applicable limits, that must be in line also with the environmental objectives envisaged in the River Basin Management Plans for the Water District of Eastern Sterea Ellada (i.e. the achievement of good status for all surface and ground waters).

**2.4** Joint Ministerial Decision 140384/2011 (published in O.G. B’ 2017/09.09.2011) elaborated by the Special Secretariat for Waters, establishes the **National Network for Monitoring the qualitative and quantitative status of surface water and groundwater** and defines measurement sites (stations) as well as those bodies responsible for their operation, in the context of implementation of Water Framework Directive 2000/60/EC. This network shall enable the establishment of a coherent and comprehensive overview of water status that shall capture the existing status and identify the need for the taking of additional protection measures whenever so deemed necessary. This network comprises five sampling points for surface waters and corresponding ones for groundwater in the respective water body.

It is noted that any deficiencies in the available data of chemical analyses for heavy metals in bodies of groundwater are addressed now both by means of the established water quality and quantity monitoring network becoming gradually operational and the updated monitoring network proposed in the Management Plan.

**2.5** Through the transposition of directive 2004/35 on environmental liability in national law (Presidential Decree 148/2009) **a framework for environmental liability is established, based on the “polluter pays” principle with a view to preventing and remedying environmental damage**, so that the operator who caused environmental damage or whose occupational activities pose an imminent threat of environmental damage is in principle held responsible for financing the necessary (preventive and/or remedial) measures.

Annex III to Presidential Decree 148/2009 on “*Environmental liability with regard to the prevention and remedying of environmental damage – Harmonisation with Directive 2004/35/EC of the European Parliament and the Council of 21 April 2004, as applicable*” lists the activities to which this legislation is applicable in case the respective operators cause environmental damage (or in case of imminent threat of causing such damage) from the

exercise of their activities, irrespective of fault. These activities include, as an indication, the installations coming under the directive on integrated pollution prevention and control-IPPC, any waste storage, transfer, management activity, the discharge or release of substances or contaminants into waters, etc.

**2.6** In recent legislation, article 10 of Presidential Decree 100/28.08.2014 (published in O.G.167 A) “Bylaws of the Ministry for the Environment, Energy and Climate Change” provides for the establishment of the Oinofyta Office with territorial jurisdiction within the Region of Sterea Ellada, forming part of the Department of Environmental Inspection of the Southern Greece Inspection Division.

As far as the controls on occupational activities within the greater Asopos river area conducted by the Special Environmental Inspectors Office (E.Y.E.P) are concerned, the following table summarizes information on the inspections carried out:

<b>ANNUAL INSPECTIONS BY E.Y.E.P IN THE GREATER ASOPOS RIVER AREA</b>				
	Inspections	Follow-up inspections	Violation Notices	Total of fines proposed
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
<b>TOTAL</b>	<b>260</b>	<b>57</b>	<b>187</b>	<b>€6,976,485</b>

### **- 3. Coordination of the administrative activities by competent bodies**

**3.1** The **PROGRAMME AGREEMENT** under article 100 of Law 3852/2010, between the YPEKA, the Municipality of Tanagra and EYDAP S.A. for the project: **“Integrated Management for the Body of Waters in Asopos River Area”** was concluded and signed on 30 July 2014, having a total budget of €37,600,000.

This Project shall decisively contribute towards an effective management of the water bodies (surface and ground waters) in the Asopos river area.

At the same time, given the requirement for a rational management of water

resources and the environmental remediation of the area, it is envisaged that the project shall also contribute towards the fulfillment of the obligations placed on Greece under Community Directives, such as the Water Framework Directive (2000/60/EC) and the Directive concerning the protection of waters against pollution caused by nitrates from agricultural sources (91/676/EEC). This Project, financed from funds of the NSRF and the Public Investments Programme for the current (2007-2013) and the next programme period (2014-2020), is made up of the following two discrete components:

**Project I**

- **Water supply aspect**, aiming at smoothly supplying urban and industrial areas within the Municipality of Tanagra with drinking water of high quality, and

**Project II**

- **Environmental aspect**, aiming at the environmental recovery of the aquifer.

The Programme Agreement aims to ensure a permanent, regular and operational cooperation between the contracting parties towards the preparation, design, effective implementation and application, implementation supervision and safeguarding of the functionality and sustainability of the respective Action.

**The subject matter of the Programme Agreement** is the definition of financing and implementation competencies for the Project “Integrated Management for the Body of Waters in the Asopos River area” and the contracting parties’ obligations arising under such competencies.

The Project Implementation Authority and Project Owner (the Municipality of Tanagra), following the completion of the Project, shall explore, in cooperation with the Advisory Authority (EYDAP S.A.), the possibility of undertaking the management and operation of the project, provided the procedures prescribed by law are followed and a Contract to this effect is executed whereby the financial, time and other cooperation parameters shall be established after the completion of the Project. The scope of the agreement includes also the identification of all necessary actions as well as the cooperation framework of the contracting parties towards the timely and effective implementation and/or the viable operation of the Project.

More specifically, in the context of implementation of the Project and for the purposes of the Programme Agreement, the Project Sponsor (recommending authority) (YPEKA) empowers the Project Implementation Authority and Project Owner (Municipality of Tanagra) to operate as the Project beneficiary under the NSRF action, as well as to see to the functionality of the project and perform the following (indicative) tasks:

1. Activities necessary for the maturity of the Project (elaboration of maturity studies and obtaining of the necessary authorizations);
2. Implementation organization and design;
3. Preparation of the Project Fiche for inclusion of the project in the Operational Programme and implementation of all actions required by the Operational Programme “Environment and Sustainable Development” for project financing;
4. Activities necessary for land acquisition and earmarking;

5. Preparation and/or updating of any Tender Documents as necessary;
6. Handling of all necessary procedures for the administration of managerial tasks necessary for the completion of the Project (e.g. holding of tenders, management of contracts for works, studies, Services and Supplies, elaboration and submission of sub-project fiches, signing of the relevant contracts);
7. Activities necessary for all licensing procedures;
8. Monitoring of cash flows and effecting of payments against to the Project budget;
9. Implementation of the Project in its entirety;
10. Upon the acceptance of the independent Project segments when completed, the Project Sponsor (YPEKA) is promptly advised by means of complete technical and financial documentation;
11. Any other activity as may be necessary for the completion of the Project, in accordance with the specifications of the Agreement and the recommendations of the Project Sponsor (YPEKA).

The studies for the construction of the works will start in autumn of 2014, while all works are scheduled to be completed within the first quarter of 2018.

#### **Projects under the programme agreement**

Two distinct projects shall be constructed within the context of the programme agreement:

##### **Project I**

This project concerns the smooth provision of water supply for urban and industrial areas in the Municipality of Tanagra.

The project comprises the construction of a central water treatment plant, new pipeline network conveying water from the new plant to the reservoirs of the residential settlements and the construction of new main distribution pipelines for a more rational distribution of drinking water in the residential settlements of Schimatari, Oinofyta, Oinoi, Dilesi and the Schimatari-Oinofyta industrial zone.

##### **Project II**

This project concerns the environmental recovery of the aquifer. It comprises the construction of a new steel pipeline about 5,400m. long having a variable cross-section from  $\Phi$  700 to  $\Phi$  400 and water intake points every 300 – 500 m. for a daily output in the order of 20,000m<sup>3</sup>/day.

The main pipeline shall be under pressure and shall be designed in such a way as to enable its connection to a network of secondary pipes for pouring untreated (raw) water from EYDAP aqueducts to sites in Agios Thomas and Oinofyta over an area of 20 square kilometers for the purpose of recharging (enrichment) of the aquifer and its gradual environmental recovery.

#### **- 4. Water resources and waste management**

**The Water Resources Management Plan for the Water District of Eastern Sterea Ellada,**

elaborated in accordance with the requirements of Directive 2000/60/EC in implementation of Law 3199/2003 and Presidential Decree 51/2007, has incorporated all comments and remarks from the long consultation process to which the Draft Management Plan was submitted as well as from the consultation on the Strategic Environmental Assessment.

The Management Plan for the water district of Eastern Sterea Ellada was approved by the National Water Commission and then published in the Official Gazette (issue 1004/B/24.04.2013).

The Management Plan comprises a **Programme of Measures (PoM)** lying at the core of the strategic planning for the Water District and comprising all necessary interventions, either at an administrative level or at a level of actions and projects, with the aim of delivering an integrated management of waters and ultimately achieving the environmental objectives of the Water Framework Directive.

The measures involved are distinguished into basic and supplementary ones:

**Basic Measures** are those measures associated with the implementation of the national and Community legislation for the protection of the waters, including Directive 2000/60/EC and of the implemented environmental policy in general, and constitute the minimum requirements to be included in the PoM. More specifically, basic measures are measures intended for implementation of the Community and National legislation which are determined and/or imposed as a result of the implementation of European Directives relevant to the environmental policy for waters.

**Supplementary measures** are those measures designed and implemented in addition to the basic measures, for the purpose of achieving the objectives specified in art.4 of Presidential Decree 51/2007.

PoMs are updated and reviewed every 6 years, while every new or revised measure established by virtue of an updated Programme must be made operational within three years as of its establishment.

More specifically, where the Asopos River Basin is concerned, in addition to the Measures applicable to all surface water and groundwater bodies, the Management Plan for Eastern Sterea Ellada also envisages the following:

#### **1) Asopos River Demarcation**

A demarcation of Asopos River is proposed, to enable a subsequent identification of protection zones. The purpose of the demarcation (delimitation) of a river is to map the natural river bed in view of its character as both a hydrogeological element and an ecosystem. The demarcation consists in establishing and validating the lines on either side of the centerline (axis) of the river, surrounding the flood lines (flooding area), the banks, as well as any natural or artificial elements constituting an integral part of the watercourse.

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

In accordance with the terms and conditions set out in Joint Ministerial Decision (JMD) 20488/2010 a Feasibility Study regarding a Central Industrial Waste Treatment System in the Oinofyta-Schimatari area was elaborated (Hellenic Federation of Enterprises-SEV, 2010),

under which the solution of preference for liquid waste management among stakeholders (investors, industries, licensing authority) is the erection of two treatment plants, one for the treatment of the chemical load and the other for the organic load. It is proposed to erect the plants in the same location so that the chemical plant effluent may end up for final biological treatment in the organic plant. Input limits both to the biological treatment plant from the plants and the chemical treatment plant shall be established and these shall be relevant to those applicable in the case of Industrial Zones or in the case of disposal to EYDAP sewage pipes, while input limits to the biological treatment plant from the chemical treatment plant shall be as set in JMD 20488/2010 (published in Government Gazette issue 749 B/31.05.2010). The solution proposed involves the following individual implementation phases: Design, Environmental Licensing, Tendering, Construction, Operation, over a total time span of 3-4 years.

### **3) Exploration of the ability to proceed with immediate actions for addressing the pressures to the Asopos River Basin from industrial facilities**

In the context of promptly tackling the problems identified in Asopos River Basin and until the completion of the industrial waste treatment facilities in the Oinofyta-Schimatari area, it is proposed to explore the possibility of undertaking alternative actions that can readily be implemented.

In all cases and until the finalization of the design for the treatment of liquid industrial waste in the area of Asopos, YPEKA works with EYDAP, local authorities and industrial operators in the area for promoting a safe system for the provisional management of liquid waste generated by the industrial plants operating in the Asopos area by means of the transfer of pre-treated liquid industrial waste of some of the plants to the Metamorphosis Wastewater Treatment Plant through the implementation of a suitable accreditation system for the collection-transport-delivery procedure.

### **4) Programme of investigative monitoring of point source discharges at the Asopos River Basin**

This measure is aimed at an integrated and systematic recording and monitoring of discharges from point sources to surface and ground waters and at checking whether the emission limits established in Annex B of JMD 20488/2010 (published in Government Gazette issue 749 B/31.05.2010) are complied with.

A description of the above Measures is given in the Water Resources Management Plan for the Water District of Eastern Macedonia posted on the internet at [www.wgd.ypeka.gr](http://www.wgd.ypeka.gr).

## **- 5. Appropriate initiatives**

**5.1** The Special Secretariat for Waters (SSW) commissioned the elaboration of a research project (currently in progress), under the financial instrument LIFE+, entitled “**Chromium in Asopos Groundwater System: Remediation Technologies and Measures**” (CHARM). This project, even though referring to the groundwater system of Asopos River, aspires to contribute significantly to a complex problem posing a serious threat for the sustainable development of groundwater bodies in many European regions. The project results shall

provide solutions to technical, social and administrative problems in a comprehensive approach to water resources management offering thus a flexible approximation to be readily transposed to other river basins.

The main axes of the said research project are the following:

- Analysis of the institutional framework for the presence of total and hexavalent chromium in the aquatic environment and establishment of qualitative objectives in accordance with the principles laid down in Directive 118/2006 on total and hexavalent chromium;
- Methodology development for assessing pollution caused by hexavalent chromium at the basin level;
- Assessment of pollution caused by hexavalent chromium to ground waters in Asopos river basin;
- Evaluation, on a pilot basis, of remediation physical/chemical and biological methods for the removal of hexavalent chromium from ground waters;
- Formulation of a programme of measures in the light of framework directive 2000/60/EC, specific to the Asopos river basin;
- Basic measures (Measures for the implementation of Community and National legislation on the protection of waters and investigation of alternative technologies with an emphasis on optimal available techniques and clean technologies);
- Supplementary measures (institutional ones, negotiated environmental agreements, pollutant emission controls);
- Evaluation of the PoM proposed and cost effectiveness analysis;
- Publicizing and Dissemination of the results

SSW commissioned the creation and operation of website [www.charm-life.gr](http://www.charm-life.gr)

## **B. Article 11, para. 2, of the European Social Charter**

### **- 1. Information to the public with regard to action undertaken, at national, regional and local level**

**1.1** Information to the public and local authorities is a constituent element in addressing the issue. This information requirement is fulfilled by YPEKA both via established consultation procedures on the River Basin Management Plans for the respective Water District and via an open consultation with the public as well as scientific updating.

The public concerned, including the applicants, had many opportunities to be informed with respect to action taken and planned and also to express their views on the Asopos area issues.

**1.2** In January 2011 YPEKA organized **an international Conference** on this issue where it was concluded that the views in support of the need for a review of the legislation on

drinking water and establishment of a limit for hexavalent chromium are well-founded. Greek authorities are committed to closely following developments in this issue in the international community and mainly in California and the USA and to sustaining cooperation. The YPEKA supports with all means available to it any progress in this area which, however falls exclusively under the domain of the Ministry of Health.

**1.3** Actions relevant to the dissemination of information to the public with regard to the River Basin Management Plan for the Water District of Eastern Sterea Ellada were initiated on 13 January 2012 and were completed on 21 November 2012.

The consultation involved two phases:

**Phase A**

The following has been the subject of deliberation until 31 March 2012:

- Reporting on measures to be taken submitted to consultation;
- List of social partners;
- Review of the most important issues relevant to water management.

**Phase B**

On 3 May 2012, the documentation texts for the Management Plan of the Water District of Eastern Sterea Ellada became available on the website dedicated to consultation on national water resources Management Plans (<http://wfd.opengov.gr>).

During Phase B of the consultation there was deliberation on the following:

- The River Basin Management Plan for the Water District of Eastern Sterea Ellada, which includes the measures required for water protection and management, aquatic environment quality improvement, curbing pollution of aquatic ecosystems, safeguarding the sustainable use of waters, as well as the specific measures ensuring continuous monitoring of the qualitative and quantitative status of waters.
- The Strategic Environmental Assessment (SEA), which identifies, describes and assesses the environmental impact of the implementation of measures included in the Management Plan, providing an analysis on the advisability of their implementation as well as alternative solution scenarios for water management issues.

The presentation of the measures to be submitted to consultation, the critical water management issues, the Management Plans, the PoM and SEA for the Water District of Eastern Sterea Ellada took place in two workshops organized in Lamia (20.6.2012) and Levadia (21.6.2012). Furthermore, on 14.12.2012, a workshop was organized in Livadia, on the initiative of the Technical Chamber of Greece/Section of Eastern Sterea Ellada, in which the main details of the Management Plan for the Water District of Eastern Sterea Ellada were presented.

The Strategic Environmental Assessment document was posted on the website dedicated to consultation on Management Plans for the water resources of the country (<http://wfd.opengov.gr>) on 28 November 2012; furthermore, the YPEKA Special Environmental Agency forwarded the Strategic Environmental Assessment (SEA) accompanying the Management Plan to the competent authorities for their opinion



thereon.

**1.4** The research team of National Technical University of Athens, in cooperation with the Special Secretariat for Waters and the Region of Sterea Ellada-Regional Unit of Boeotia, organize frequent open **Project Meetings** aimed at advising all stakeholders on the actions, the progress and the results of the project: **LIFE+ “Chromium in Asopos Groundwater System: Remediation technologies and measures” (CHARM)**.

**1.5** At regular intervals, the YPEKA informs the public via **Press Releases** and/or interviews of its political leadership, and the Parliamentary Committee for the Environment has also been informed in-depth. Also, via the Parliamentary scrutiny procedure, Members of Parliament are advised by the YPEKA Minister who replies to a great number of Questions submitted.

From the above it is evidenced that **the YPEKA**, being the competent authority, in cooperation with local authorities and all stakeholders, **systematically proceeds, through consultation and in transparency, with the establishment and implementation of a Management Plan for tackling pollution in the Asopos area, consisting of measures of institutional safeguard** (JMD on Asopos, River Basin Management Plan, etc.), **intensification of inspections and controls, strengthening of the infrastructure for water intake, water supply and urban waste management, as well as the medium-term and long-term planning for the management of liquid industrial waste being the responsibility of the producers of such waste, and at no time and under no circumstance has the YPEKA neglected or failed to act as mandated by law.**

#### **ACTIONS OF THE MINISTRY OF HEALTH**

The Division of Public Health of the Regional Sector of Boeotia has been closely monitoring the quality of drinking water throughout the district of Boeotia and particularly in the areas near Asopos river, and has intervened in all cases this was warranted, in cooperation with water supply authorities (Local Government Organisations, DEYA, etc.) for addressing public health hazards towards protecting and safeguarding Public Health.

Moreover, **the villages of Oinofyta, Schimatari, Agios Thomas and Dilesi within the Municipality of Tanagra are supplied with water by EYDAP. Local boreholes are in operation in the remaining communities of the area. Since 2012 there have been no exceedances in the values of the chemical qualitative parameters in distributed water intended for human consumption (except for one case, in which the established nitrates value was exceeded in a private borehole that is no longer used).**

#### **ACTIONS OF THE MINISTRY OF EDUCATION**

##### **Article 11**

- **Primary Education**

**Provision of educational and advisory instruments for the promotion of health**

**A. Educational instruments**

Pursuant to the provisions of points 2, 3 and 4 of para.2 of art.11 of Law 4229/2014 (O.G.8 A/10.1.2014) as replaced (points 3 and 4) by art. 53 of Law 4238/2014 (O.G.38 A/17.2.2014), the supporting documents required for the enrolment of students in kindergarten and the 1<sup>st</sup> Grade of elementary school include the following:

- Presentation of the Child's Health Booklet (CHB) or production of other document evidencing that all prescribed vaccinations have been done;
- The Student's Personal Health Card (SPHC)

Joint Ministerial Decision No.Φ6/304/75662/C1/16.05.2014 (O.G.1296B/21.5.2014) specifies the form, terms and conditions for drafting, issuing, storing and processing of the SPHC. The said JMD specifies the SPHC as a supporting document for enrolment in kindergarten and the 1<sup>st</sup> Grade of Elementary School, as well as a medical certificate for monitoring the student's health during attendance of Primary and Secondary Education (P&SE) school units.

The Student's Personal Health Card (SPHC):

(a) is of a preventive nature and aims at protecting and safeguarding the life and health of students, and supporting them through the adoption of appropriate measures;

(b) is a means of communication between the doctor and the school unit and contains the school-relevant findings of the medical examination of the student;

(c) is a necessary supporting document for enrolment in Kindergarten and the 1<sup>st</sup> Grade of Elementary School;

(d) serves as a medical certificate pursuant to the provisions of art. 122 "equivalence of medical certificates" of Law 2071/1992 "Health System Modernisation and Organisation" (O.G.123 A/15.7.1992) as amended and applicable;

(e) is necessary for the student's participation in the class of Physical Education, school sports activities and school activities in general;

(f) provides information to the teaching staff of the school unit with regard to the health condition and the participation of the student in the learning process.

- The SPHC is kept on the responsibility of the Principals of P&SE school units.

- Teaching staff as well as doctors and other health professionals, as applicable, are informed of the SPHC content, for the purpose of taking measures towards protecting and safeguarding the students' life and health and supporting them within their respective scope of authority.

- Doctors and health professionals serving at the NHS Primary Healthcare Unit (Health Center, Multi-disciplinary Regional Medical Clinic, Hospital Outpatients Department, etc.) closest to the school unit that a student attends may, on the parent/guardian's consent, be informed of the SPHC's content in the case of students presenting serious health problems (e.g. heart disease, allergies, neurological, metabolic diseases, etc.) to enable them to promptly intervene in emergencies, in cooperation with the principal of the school unit.

The above legislative arrangement was enacted, upon consultation of Ministry of Education departments with a scientific team and administrative executives of the Ministry of Health, with a view to incorporating the said health certificate into a single form, the SPHC, in order to eliminate citizen-related social and economic issues.

#### **B. Advisory instruments**

- ***Secondary education***

**Students, through the content of the various courses, have the opportunity to address issues touching on health protection.**

Furthermore, the Ministry of Education, being particularly sensitive in matters relevant to prevention and promotion of health of students, has included **Health Education** in the school curricula by virtue of para.6 of Art.7 of Law 2817/ O.G.78 A/14.3.2000 and in school activities by virtue of decision No. Γ2/4867/28.8.92 /O.G.629/B/ 23.10.92.

Moreover, **Consumer Education** was included in school activities by virtue of decision No.Γ2/7668/18.12.97/ O.G.1153/B/29.12.97, and **Traffic Education** was included within Health Education school activities by virtue of decision 90230/Γ2 O.G.1211/B/18.9.2002.

A prerequisite for the offering of such programme is the attendance, by Teachers, of seminar training in the innovative methods they shall implement. They should also be supported and the proposed options documented, to enable them to have in-depth understanding of the knowledge imparted, the reasons therefore and the anticipated outcomes.

**Health Education** includes:

- Nutrition and diet habits – Genetically modified products
- Exposure to toxic substances and excessive solar radiation
- Living and working conditions
- Environment and Health

About 6000 Health Education programmes are held in every school year, in which student attendance is optional, while the relevant programme implemented by student groups are coordinated by teachers having received training, under the supervision of Persons Responsible for Primary & Secondary Health Education programme. All student-related programmes are held by Teachers in the respective School Units, while Special Scientific bodies provide training to the Teachers who then apply the programme.

**Finally, in every school year, free Health Education interventions are organized at schools by Hospitals, Health Centers, Medical Associations, Health Institutes and other bodies, performing preventive screenings, examinations and providing information on student health prevention.**

➤ **Environmental programmes/projects in years 2005-2013**

Environmental programmes have been elaborated in the following regions during the last

years, relevant to water and soil pollution. Some of the topics explored are:

**BOEOTIA (Environmental programmes for Asopos river- 2013/14)**

- *Water in nature – the pollution of Asopos river /Junior High School of Asopia*
- *Environmental routes for the waters of Asopos/ General Senior High School of Schimatari*

**MEGALOPOLIS**

- *The water roads: Sustainable use and development*
- *Water in nature: sea and wetlands management*

**KOZANI**

**2013-2014**

S/N	PROGRAMME TITLE
1.	Construction of an underwater device for measuring environmental conditions in Lakes
2.	Stabilization of active sludge by fly ash
3.	Who threatens biodiversity?
4.	Sustainable development in the city of Ptolemaida
5.	Biological treatment
6.	Dams and artificial lakes. Technical interventions to the natural environment
7.	Water as a source of life and growth
8.	Sustainable development of the water districts of Karla, Pilio & Polyfytos – School Environment Network of Cooperation among the Junior High Schools of Kanalia, Trikeri Magnisias & Aiani Kozanis
9.	Ask the water ... What is going on...
10.	Energy resources of the District of Kozani – Benefits and problems
11.	Water as an element of life, creation and a symbol
12.	Perdikka Dam : Environment and renewable energy sources
13.	Solution to the environmental pollution problem in the plane-tree forest of Servia, assisted by educational software

**2012-2013**

S/N	PROGRAMME TITLE
1.	Water: Water signs in time and in space
2.	Lakes and man. The lakes of Eordaia
3.	Practical application of sustainable development in small

	townships
4.	Water: Lake and river ecosystems of Macedonia – Pollution and protection
5.	Wetlands: water is an element, and water has a spirit
6.	Down, down the water flows...
7.	Agritourism and water management
8.	Refuse management, recycling
9.	Power generation from water power as a solution to the energy issue. Case study: Hydroelectric station of Polyfytos (PPC)
10.	All together we can save Earth
11.	Water: source of life and energy. Hydroelectric stations, dams and artificial lakes in Greece
12.	Ecosystems: Structure and operation of land and water ecosystems. Mountainous and coastal areas
13.	Ecosystems – Biodiversity

**2011-2012**

<b>S/N</b>	<b>PROGRAMME TITLE</b>
1.	Utilized energy sources
2.	Agriculture and the environment
3.	Nuclear energy and the environment
4.	Batarioulis – Recycling of batteries
5.	Artificial lake of Polyfytos. Looking to the future
6.	Technology-Environment-Culture: Friends or Foes?
7.	Water. Source of life – A fundamental element of human civilization – Knowledge of the past. Future outlook
8.	Agritourism and water management
9.	Alternative tourism and ecotourism as a means for creating positive social, cultural and environmental outcomes
10.	The ecosystem
11.	Batarioulis – Recycling of batteries
12.	Perdikas dam: past, present and future

**2010-2011**

<b>S/N</b>	<b>PROGRAMME TITLE</b>
1.	“Conventional and Organic Farming”: Genetically modified plants and foods, effects on the environment and man
2.	A river turned lake. Changes and consequences in the area
3.	Energy and the Natural Environment – The place we live in: Municipality of Ellispondos. Adverse environmental impacts
4.	Eutrophication in Zazari – Chimaditida lakes and implementation of plans for saving them

5.	Rational and sustainable management of the water potential in Polyfytos lake
6.	Olive oil production and olive-oil press waste management
7.	Effects on the man-made environment by PPC activities in the area of Eordaia
8.	Recycling of electronic appliances
9.	Production of energy from refuse and biomass

**2009-2010**

S/N	PROGRAMME TITLE
1.	The river gives life
2.	Water: Source of life, energy, creation
3.	The water roads – Lakes in Western Macedonia
4.	Water energy – Polyfytos Dam
5.	Environment and quality of life
6.	Hot water springs: Water of the many gifts
7.	Water: Source of life and wealth
8.	A study of the effects of liquid wastes (pesticides, industrial-urban waste) on (final) water receptors
9.	Virtual water: A new tool in water resource management. An ecological and sociological approach
10.	Environmental risks – Natural disasters and human intervention
11.	Water pollution in the Municipality of Tsotyli

**2008-2009**

S/N	PROGRAMME TITLE
1.	Environmental and socioeconomic effects of the operation of Steam Power Plants in the district of Kozani
2.	Public Power Corporation and the local community
3.	Lakes of Western Macedonia: On the edge of hope
4.	Water in transformation, Stalactites-Stalagmites
5.	The power of water
6.	Co-management of urban waste sludge and PPC ash. Heavy metals and microbial load removal and improvement. Return to nature for land reclamation. Forest protection

**2007-2008**

S/N	PROGRAMME TITLE
1.	Effects of the energy utilization of lignite – renewable energy

	sources
2.	The cycle of water in our city
3.	Batteries: Those little devils
4.	Solution to the environmental pollution problem in the plane-tree forest of Servia, assisted by educational software
5.	Presentation of mild forms of energy – Getting acquainted with law 3468/2006 – The environmental problem of Ptolemaida with the existing energy forms-Getting acquainted with wind parks – Acting as advisors to our fellow citizens
6.	Recycling of car tyres
7.	Alternative activities and tourism in Kozani

**2006-2007**

S/N	PROGRAMME TITLE
1.	Waste and refuse management: Production, reduction, reuse
2.	Energy as a consumer product – environmental impact – renewable energy sources
3.	Polyfytos Lake “Renewable energy source – ecosystem – aquatic environment – consumption and environmental impact”
4.	Environmental impact of the operation of industrial plants in the area
5.	Anthropogenic interventions to the natural environment of Aliakmonas river in the district of Kozani and their environmental impact

**2005-2006**

S/N	PROGRAMME TITLE
1.	Power generation in the area of Eordaia
2.	Water in our private lives
3.	Water as recreation: Hot water springs and Spa of the Municipality of Aetos
4.	Water and Quality of life
5.	The contribution of drinking water reserves to sustainable development in the Municipality of Ellispondos, district of Kozani
6.	Organic Farming and cattle raising
7.	Surface and ground waters – Water over-abstraction
8.	Recycling – Refuse management
9.	The artificial lake of Polyfytos-Servia and its importance for the area
10.	Pollution of water and soil
11.	Water’s journey from the natural springs to our glass
12.	Nomadic pastoralism and the natural environment. An

	ecological and sociological approach
13.	The aquatic world of Polyfytos Lake
14.	Water: From precious to precious little...
15.	Aliakmonas River in space and in time
16.	Environmental degradation
17.	Environmental impact of the operation of lignite mines in the district of Kozani

### **ACTIONS FOR THE PROMOTION OF HEALTH OF THE GENERAL SECRETARIAT FOR YOUTH**

#### **➤ *Event for World AIDS Day***

The General Secretariat for Youth (GSY), in 2010, on the occasion of World AIDS Day organized a high-profile event, launching at the same time a process of interactive communication with young people via the social media. At the same time, the GSY, given the great increase of HIV infections in Greece, according to the Ministry of Health & Social Solidarity data, in November 2011 published and distributed the new information guide on AIDS. Since 2012, it has also been available in 4 additional languages (Russian, Albanian, English and French) for providing information to immigrants in Greece.

#### **➤ *Joint organization of the “Programme for supporting children-families living below the poverty line in Elefsina”***

The GSY in cooperation with “Schedia” Centre for Education & Art Training, developed a plan for the implementation of a multi-layer action for combating poverty through providing support to children in families living below the poverty line in degraded areas of Athens and, more specifically, children of Greek and/or immigrant families in the area of Elefsina/Magoula, involving a programme of school support to children in elementary schools and junior high schools, meal provision, and psycho-social support to children and parents as well as research for the study of policies on children in other European countries. The duration of the Programme was 7 months (April-October 2012). The total number of children that benefited from this programme amounted to 60, with a daily attendance of at least 30. The Programme received funding in the amount of 28,000 Euros.

#### **➤ *Joint organization of the programme “Medical Landing in Border Islands”***

In the context of this programme, the GSY cooperated with the Scientific Society of Hellenic Medical Students (SSHMS) and provided its support so that medical students having completed their 4<sup>th</sup> year of study could provide assistance, on a volunteer basis, to doctors serving at medical units in border islands during the summer months given the increased healthcare needs during the tourist season. The Programme was implemented in years 1997 to 2011, with the exception of 2010. In year 2011 (20.07/30.08.2011) the work of doctors serving at 26 Health Units (Hospitals, Health Centers, Regional Medical Clinics) in 25 border islands and other islands in Greece was supported by 250 medical students. The GSY



awarded a grant (20% of the total cost of the Programme) to the contracting authority; the total amount of funding by GSY amounted to 11,000 Euros.

➤ ***“Awarding of a grant, by the General Secretariat for Youth, to Aristotle University of Thessaloniki for the elaboration of a programme of physical and nutrition education for children, with the aim of preventing physical inactivity and obesity in children”***

The “Physical Activity and Leisure” Division and the “Motor Control and Learning” Lab (Department of Physical Education and Sports Science) of Aristotle University of Thessaloniki shall elaborate, in the immediate future, a programme on the physical and nutrition education for children, with the aim of preventing physical inactivity and obesity in children, which (programme) involves the implementation of an intervention for the prevention of physical inactivity and obesity in children. The programme shall include a series of activities for the dissemination of the intervention actions and its results to the scientific community and the public in general. The programme is addressed to public and private school students in primary education within the boroughs in the city of Thessaloniki and the rural areas of the district of Thessaloniki, their parents and families. The minimum number of participants is estimated to 1000 students and the maximum number to 1200, and the intervention shall be of three-month duration. The budget of the programme amounts to a total of twenty thousand (20,000) Euros.

➤ ***Research project entitled “Prevention of the occurrence of respiratory diseases in young people – creation of an allergy forecast map for the area of Alexandroupolis”***

The General Secretariat for Youth, in cooperation with Democritus University of Thrace-Medical School-Department of Otolaryngology, elaborated a research project entitled “Prevention of the occurrence of respiratory diseases in young people-creation of an allergy forecast map for the area of Alexandroupolis” in the period 1 February 2013 to 31 January 2014, having a cost of 55,000 Euros, with the aim of detecting the concentrations of inhaled air-borne allergens in the area of Alexandroupolis - Evros (a radius of 100 km.) and create an allergy forecast map for the said area with daily update and information to the public via the internet so that vulnerable population groups may take appropriate precaution measures. The database created, which shall be further enhanced on an ongoing basis, may be used as a guide for other areas of the country as well.

**8. Collective Complaints (a) 76/2012 “*Federation of Employed Pensioners of Greece (IKA-ETAM) v. Greece*”, (b) 77/2012 “*Panhellenic Federation of Public Service Pensioners v. Greece*”, (c) 78/2012 “*Pensioners’ Union of the Athens-Piraeus Electric Railways (I.S.A.P.) v. Greece*”, (d) 79/2012 “*Panhellenic Federation of pensioners of the public electricity corporation (POS-DEI) v. Greece*” and (e) 80/2012 “*Pensioner’s Union of the Agricultural Bank of Greece (ATE) v. Greece*”**

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**BACKGROUND**

In January 2012, collective complaints 76, 77, 77, 78, 79 & 80/2012 were lodged with the Secretariat of the Council of Europe versus Greece. More specifically, (a) Collective Complaint 76/2012 was submitted by the Federation of Employed Pensioners of Greece (IKA-ETAM), (b) Collective Complaint 77/2012 was submitted by the Panhellenic Federation of Public Service Pensioners, (c) Collective Complaint 78/2012 was submitted by the Pensioners’ Union of the Athens-Piraeus Electric Railways (I.S.A.P.), (d) Collective Complaint 79/2012 was submitted by the Panhellenic Federation of pensioners of the public electricity corporation (POS-DEI) and (e) Collective Complaint 80/2012 was submitted by the Pensioner’s Union of the Agricultural Bank of Greece (ATE). The said complaints had the same subject-matter and concerned the violation of article 12, para.3 that guarantees the right to social security, and specifically, the right to raising progressively the system of social security to a higher level. The complaints were declared admissible and examined on the merits by the European Committee of Social Rights, which sent its Report to the Committee of Ministers. In July 2014, the Committee of Ministers adopted a Resolution.

**LEGISLATION**

Since July 2<sup>nd</sup>, 2014 (date on which the Resolution of the Committee of Ministers was adopted), no legislative measures have been taken in the field of social security.

However, we consider that the following measures are worth mentioning, which were established with a view to maintaining the public, universal, obligatory and redistributive character of Social Security, while at the same time dealing with the accumulated severe problems of the last few years and supporting the vulnerable social groups of the population.

More specifically:

**A. In regard to the protection of vulnerable groups:**

- For the protection of elderly low-income pensioners, the Benefit of Social Solidarity (EKAS), **which is a non-retributive benefit**, is still granted. More specifically, case 6, subpara. IA.4, para. IA, of the first article of Act No.4093/2012 has been amended by virtue of para.1, article 8, of Act No.4237/2014 (O.G. A' 36). The applicable provisions now stipulate that from 01.01.2014, the EKAS is paid to those entitled to receive old-age, disability, survivors' pension upon reaching the age of 65. Children receiving survivors' pension (after the death of their insured or pensioner parent) as well as disabled pensioners with a disability degree of at least 80% are exempt from this age precondition. It has to be noted that, as far as disabled pensioners with a disability degree of 80% and more are concerned, circular No.F.11321/36369/2308/28.02.2014 of the General Secretariat for Social Security (ADA: BIEKL-X63) clarifies that all categories of pensioners, i.e. old-age, disability and survivors' pensioners, for whom the Health Committees Certifying Disability have certified a disability degree of 80% and more, are exempt from the precondition of having reached the age of 65.

Moreover, regarding the granting of the EKAS for the year 2014, the same circular clarified that the EKAS amounts shall not be adjusted, but remain at the same level that applied in 2013. These amounts have not changed since 2011 (see article 34, para.1 and para.2, of Act No.3996/2011 [O.G. A' 170]).

- Article 66 of Act No. 4144/18.4.2013 (O.G. A' 88), as finally amended by article 141, para.1 of **Act No.4251/2014 (O.G. A' 80)** regulates the issue of extending the entitlement to disability pensions, benefits for para/quadriplegia and total disability benefits, granted to pensioners and beneficiaries of bodies that fall within the competence of the Ministry of Labour, Social Security and Social Solidarity, for those cases where the entitlement to such a benefit expired until 30.04.2014, provided that a medical assessment by the Health Committees Certifying Disability is still pending, without any fault on the beneficiaries' part.

These provisions stipulate that all entitlements to pensions granted due to disability (disability pensions, pensions granted by virtue of Act No.612/1977, survivors' pensions granted to children who are incapable of any gainful activity), shall be extended for six months, i.e. the beneficiaries shall continue receiving the same amount they used to before the expiry of their entitlement, provided that they had been assessed by the competent health committee with a disability degree of at least 67%. Similarly, all entitlements to benefits granted due to disability (benefits for para/quadriplegia and total disability benefits) shall be extended for six months. Moreover, it is stipulated that, persons whose entitlement to disability pension or benefit already extended for six months has expired or shall expire until 30.04.2014, are entitled to an extra extension for six more months, provided that the medical assessment by the Health Committees is still pending.

Furthermore, during the extension period of the disability pension or benefit entitlement, deductions are made in order to cover sickness benefits while pensioners and beneficiaries are provided with medical and hospital care.

With regard to this issue, the Ministry has already forwarded relevant instructions to the social security organizations by virtue of circular No. F.80000/4345/281/13.03.2014 (ADA: BIKNL-26C).

**B. In regard to the improvement of the social security system**

By virtue of the provisions of Act No.4254/2014, the allocation of part of the primary surplus of the General Government was established, amounting to 450 million Euros, **to the payment of a social dividend to citizens and families with low annual income and low-value immovable property**. The social dividend is paid as a **tax free lump-sum**. The income and property eligibility criteria for its granting were set by a Joint Ministerial Decision of the Ministers of Finance and of Labour, Social Security and Social Solidarity.

**Article 11 – The right to protection of health**  
**Paragraph 2 – Provision of advisory and educational facilities for the promotion of health**

With regard to the negative conclusion on the above mentioned provision of the ESC due to the lack of adequate information on the provision of counseling services and the conduct of medical checks and tests for the entire population in general, and pregnant women and adolescents in particular, we would like to inform you of the following:

**A. Preventive Check-ups, Tests, Informing the entire population**

The Department of Health Education and Prevention, Directorate of Primary Health Care and Prevention (article 19.3d of P.D. 106 - O.G. 173/A'/28.08.2014) operates at the Ministry of Health, and is responsible for the design, the development and the implementation of actions and programs relating to informing, awareness raising, health education and prevention, child, maternity and family health promotion at Primary Health Care level. More particularly, the following fall within the area of competence of the above mentioned Directorate:

**1. ACCESSIBILITY TO PRIMARY HEALTH CARE STRUCTURES**

In accordance with article 1, para.4, of Act No.4238/2014 (O.G. 38 A) «*National Primary Health Network (PEDY), changing the purpose of EOPYY and other provisions*», the **State shall ensure and guarantee the provision of health services, through Primary Health Care (PFY) for all citizens, which are necessary and sufficient to safeguard their health and promote social well-being.**

By virtue of the above mentioned Act, a National Primary Health Network (PEDY) is established within the National Health System (ESY) which provides, inter alia, the following Primary Health Care services:

- Assessment of citizens' health needs, design and implementation of measures and programs in order to prevent diseases, universal implementation of a national screening program for specific diseases, as well as health promotion.
- Family planning and services for the mother and child.
- Primary dental and orthodontic care, placing emphasis on prevention.
- Implementation of vaccination programs.

In accordance with article 1, para.3, of Act No.4238/2014, **equal access to** Primary Health Care Services and Health Units of PEDY is ensured, **irrespective of the financial, social, professional and social security status.**

Moreover, Circulars No Y3α/Γ.Π./34408/16-4-2014 and Y3/Γ.Π./23726/17-3-2014 of the Ministry of Health on the operation of PEDY Health Units, clarify that **health services are provided equally to all citizens irrespective of their social security capacity, including uninsured citizens.**

Furthermore, by virtue of Circular No.Γ3α.Γ.Π./37952/21-05-2015 on: «*Developing a single appointment scheduling platform at national level*», citizens are enabled to make appointments with doctors or other health services through the internet & free of charge concerning Primary Health Care (PFY) that will include public structures that provide Primary Health Care Services of the National Primary Health Network, the Outpatient departments of ESY hospitals (regular all day-long operation), as well as private physicians, contracted with the EOPYY.

## 2. FAMILY PLANNING – MOTHER - CHILD CARE

More specifically, regarding Family Planning (Reproductive and Sexual Health), the provisions of Act No.1036/80 (O.G. 66 A') on «*Family Planning and other provisions*», article 22 of Act No.1397/1983 (O.G. 143 A') «*National Health System, Family Planning*», as in force, as well as article 1, para.5, of Act No. 4238/2014 (O.G. 38 A) «*National Primary Health Network (PEDY), changing the purpose of EOPYY and other provisions*» apply, according to which units, services and programs relating to Family Planning and Care for Mother and Child operate within the ESY and PEDY structures, medical, nursing and obstetric operations are performed, counseling – interconnection with services is conducted, information – training – research is provided on reproductive and sexual health issues.

Moreover, article 35, para.2, of Act No. 4272/2014 (O.G. 145 A'), «*Adapting Executive Directive 2012/25/EU..... to the National Law*», provides for the operation of Family Planning Units and Mother-Child Care Units as departments or units and as services or programs within the framework of University Clinics, of ESY Nursing Units, PEDY structures and First-Degree Local Self-Government organizations. By joint ministerial decision of the Ministers of Health, of the Interior as well as of the co-competent Minister, as appropriate, following the opinion of the Central Health Council (K.E.S.Y.), the terms and conditions of their establishment, incorporation and operation, their competences, staffing, equipment and facilities, the supervision and monitoring and all other details are determined.

Moreover, by virtue of document No.Γ3δ/Δ.Φ.12/Γ.Π./26845/9-4-2015, «*Establishing the Pilot Network of Family Planning Units or Services and Mother – Child Care Units and project definition*», the procedures for the establishment of the said Pilot Network were finalized with the participation of 33 bodies per Regional Health Administration, ESY Hospitals and PEDY Health Units classified in three types: (A) Health Units that have developed programs and services (19 bodies), (B) Health Units that are developing informal activities and actions (7 bodies) and (C) Mother – Child Care Units (7 bodies).

## 3. NATIONAL NEWBORN SCREENING PROGRAM

**The Institute of Child Health (IYP) conducts screening tests for all newborns concerning four diseases** [phenylketonuria, congenital hypothyroidism, galactosemia, Glucose – 6- Phosphate Dehydrogenase – G6PD]. The program began with the issuance of Ministerial Decision No. Γ2α/160/23-02-1973 on «*detecting the disease of phenylketonuria*» by the then Ministry of Social Services. By virtue of Circular No.Υ3γ/Γ.Φ.11-2.4/Γ.Π.107830/8-11-2012 of the Ministry of Health, on “*Circular for the standardization of development and implementation procedures for the National Newborn Screening Program (E.P.P.E.N.)*” specific issues concerning the proper functioning of the Program are regulated.

By virtue of article 29 of Act No.4238/2014 on «*National Primary Health Network (PEDY), changing the purpose of EOPYY and other provisions*», **the development and updating of the E.P.P.E.N. is established** and the issuance of the relevant ministerial decision is provided for regulating the terms and conditions, scientific protocols and other procedures.

Following the above, the issuance of the required JMD is underway concerning the expansion of the E.P.P.E.N., with a view to conducting screening tests for additional disease-causing entities, as well as modernizing laboratory and technological equipment that supports this project.

## 4. CHILD HEALTH BOOKLET

The Ministry of Health pursuant to the provisions of Ministerial Decision No.A2α/5648/1976 (O.G. 1425 B) on «*establishing the Child Health Booklet*» supervises the development and updating of the

institution of Child Health Booklet **aiming at preventing children from diseases and disabilities through the continuous monitoring of their physical and mental health during their intrauterine life and up to the age of twenty.**

By virtue of Circulars No.Υ3γ/Γ.Φ.8/Γ.Π.102297/18-10-2012, No.Υ3γ/Γ.Φ.8/Γ.Π.27203/17-06-2013 and No.Γ3δ/ΔΦ.8.3/ΓΠ.25759/6.04.2015 of the Ministry of Health, issues relating to management and distribution of the Child Health Booklet are regulated. **In 2014, the Ministry of Health distributed 123.320 Booklets.**

In the context of NSRF Programs concerning the guidelines for Child Health, the Ministry of Health, in cooperation with the Institute of Child Health, promotes actions in order to reform-update and modernize the Child Health Booklet.

## 5. PREVENTIVE MEDICAL TESTS

In accordance to document No. 24916/23.06.2015 of the National Organisation for Healthcare Provision (E.O.P.Y.Y.) presenting a study on preventive medical tests conducted during the period of July 2013 – June 2014, **a Program of Preventive Medicine is developed, as provided for by the Unified Regulation for Healthcare Services (EKPY) in the context of which tests without any contribution paid by the insured persons are conducted, with a view to preventing or avoiding the occurrence of diseases.**

In the context of the above Program the following have been conducted:

**i. Prenatal testing for thalassemia, 7 tests have been conducted, (12.985 tests conducted, the cost of which is 70.838€).**

**ii. Cervix Ca (one for every year since the beginning of sexual life):**

- Preventive – Cytological examination of vaginal/cervical smear
- Preventive – special smear taking from the endocervical canal of the uterus.

**The total number of tests conducted was 112.658, at a cost of 750.302€, while the number of the same additional tests conducted outside the context of preventive medicine was 279.255, at a cost of 1.614.862€.**

**iii. Prostate Ca: Preventive PSA, for men over 50 every 2 years, for men over 60 every year. The number of tests conducted was 10.629, at a cost of 148.806€, while the number of the same additional tests conducted outside the context of preventive medicine was 635.265, at a cost of 7.699.243€.**

**iv. Breast Ca: Preventive mammography, for women between the age of 40- 50 every 2 years, for women over 50 every year. The number of tests conducted was 67.860, at a cost of 543.554, while the number of the same additional tests conducted outside the context of preventive medicine was 720.874, at a cost of 5.000.191€.**

**v. Colon Ca: Preventive colonoscopy, for men over 50 every 5 years, for men over 40 and at a high risk every year. The number of tests conducted was 833, at a cost of 72.054€.**

▪ Preventive tests for hemoglobin in urine or feces, for men aged 50-70 every 2 years. **The number of tests conducted was 860 at a cost of 72.102€ while the number of the same additional tests conducted outside the context of preventive medicine was 59.740, at a cost of 4.082.556€.**

**vi. Dyslipidemia prevention:**

- Preventive tests for high density lipoprotein cholesterol, for persons aged 15-30 every 5 years, for persons over 30 every 3 years.
- Preventive tests for cholesterol in blood (esters and total), for persons aged 15-30 every 5 years, for persons over 30 every 3 years.

▪ Preventive tests for low density lipoprotein cholesterol, for persons aged 15-30 every 5 years, for persons over 30 every 3 years.

**The number of tests conducted in total was 20.891 at a cost of 88.737€, while the number of the same additional tests conducted outside the context of preventive medicine was 10.605.363 at a cost of 36.191.729€.**

## **6. Health Education – Information**

In 2014 the following actions and activities took place in order to inform the public either individually or within the framework of Health Education Programs:

- Distribution of printed material (booklets, leaflets, posters, stickers) in order to inform the public on Public Health issues. The said material was distributed in Ministries, Hospitals, PEDY Health Units, Local Self-Government Agencies and other bodies.
- Documents have been issued concerning WHO World Days and in particular the World Health Days, the World No Tobacco Day and Children's Day.
- In 2014 almost 110 events were held (information days, conferences, information campaigns etc.), under the auspices of the Ministry of Health, that were organized by various non-profit bodies.
- Actions concerning the broadcasting of messages in the media (voluntary blood donation).

### **B. Provision of counseling services in Secondary Education**

Regarding the schools in the country, the **Ministry of Culture, Education and Religious Affairs** implements **Health Education programs** with the aim of forming integrated personalities, developing skills, promoting health and upgrading the quality of students' lives.

More specifically, in accordance with Ministerial Decision No. 4867/Γ2/28-8-1992 (O.G. 629 B/ 23-10-1992) on «*School activities*», Secondary Education schools may, in cooperation with the local authorities, carry out activities inside or outside schools, aiming at the intellectual development, the aesthetic culture as well as students' awareness raising on issues relating to their local and broader environment.

More specifically, based on the above mentioned Ministerial Decision, Circular No. 167127/Γ7/15-10-2014 was issued, according to which School Activity Programs are implemented at Secondary Education Schools, including **Health Education Programs**. These programs deal with the following issues: Transgender relationships, sexual education, sexually transmitted diseases, AIDS, Hepatitis B, interpersonal relationships, mental health.

For the best possible implementation of the programs concerning «Sexual Education–Transgender Relationships» and «Sexually transmitted diseases», during the academic year 2013-2014, the Ministry of Culture, Education and Religious Affairs worked with the Ministry of Health and Social Solidarity as well as with specialized scientific bodies such as the National School of Public Health, the Second Obstetrics and Gynecological Clinic of the Athens University, the Hellenic Center for Disease Control and Prevention, etc.

Moreover, the Ministry of Education continued its cooperation with the Family Planning Association of Greece, the Society of Juvenile and Adolescent Gynecology and the Center for Family Planning of the Second Obstetrics and Gynecological Clinic of the Athens University, in order to inform parents and students of secondary education on issues relating to transgender relationships.

All co-operations with specialized scientific bodies, as well as the information material distributed to students following the recommendation of the Educational Policy Institute, have the prior approval of the competent Directorate of the Ministry of Culture, Education and Religious Affairs. The **number of Health**



**Education Programs** implemented every school-year amounts to almost **6.000**. During the school-year 2013-2014, almost **1.820 programs were implemented concerning the Prevention of Sexually Transmitted Diseases, with the participation of almost 2.100 teachers and 40.500 students**.

Moreover, **every school-year free preventive medical check-ups are conducted**, at the initiative of volunteering doctors, Health Centers, Services of Local Self-Government Agencies, in cooperation with the competent Officers for Health Education of Education Directorates throughout the country, following approval of the competent Unit of the Ministry of Culture, Education and Religious Affairs.

More specifically, we would like to inform you that during the school year 2013-14, the following medical interventions to school units throughout the country were approved:

1) **Vaccination program** for students attending the third grade of Katerini High Schools by the Pediatric Clinic of the Katerini General Hospital.

2) **Vaccination program** for students attending schools of the Western Attica Secondary Education Directorate by the Social Care Department of the Elefsina Health Center.

3) **Oral health care program** of the Arnissa Health Center for students attending Secondary Education schools of the Edessa Municipality (preventive dental examination of students, informing students on the prevention of oral health problems and educating them the proper way of brushing teeth, informing students on the right eating habits, informing parents by mail on their children's oral health condition and treatment needs, fluorination of students' teeth).

4) **Prevention and Treatment Program of Orthopedic Injuries** (mass screening for scoliosis) at Secondary Education schools of Piraeus, by the Department of Orthopedics and Traumatology of the Piraeus General Hospital.

5) **Preventive dental and anthropometric check-up program** in school units of the Pallini Municipality, by the Department of Protection and Promotion of Public Health, Social Protection, Education and Culture Division of the Pallini Municipality.

6) **Preventive dental check-up program** by the Dental Association of Piraeus, at Secondary Education School units of Eastern Attica, Western Athens and Piraeus.

Furthermore, for the school-year 2014-15 the following medical check-ups have been approved:

1) **Prevention and Treatment Program of Orthopedic Injuries** (mass screening for scoliosis) at Secondary Education schools of Piraeus, by the Department of Orthopedics and Traumatology of the Piraeus General Hospital.

2) **Oral health care program** of the Arnissa Health Center for students attending Secondary Education schools of the Edessa Municipality.

3) **Preventive oral health care program** at school units of mountainous areas of the Secondary Education Directorate, Xanthi Municipality by Dentists of the 4<sup>th</sup> Army Corps.

4) **Preventive dental and anthropometric check-up program** at school units of the Pallini Municipality, by the Department of Protection and Promotion of Public Health, Social Protection, Education and Culture Division of the Pallini Municipality.

5) **Preventive Medicine Programs** of the Maroussi Social Policy and Solidarity Organisation for students attending Maroussi schools, which included the following: vaccination against tuberculosis - MX and BCG, preventing cervical-breast cancer, informing on eating habits, obesity-anorexia, visual acuity check-up, sexual education, use of drugs, prevention of osteoporosis-scoliosis, learning difficulties, Hepatitis A', vaccination of poor and uninsured children.

6) **Preventive oral health care program** (oral-dental check-up) by the dental Department of the Schimatari Health Center for students attending Schimatari, Inophyta and Asopia High Schools in Beotia.

7) **Medical check-up programs** for students attending Secondary Education schools in Eastern Attica, aimed at preventing diseases relating to **thyroid gland and obesity**, implemented by the «Dianthos» Association of Volunteers in cooperation with the «Alexandra» Athens Public Hospital and volunteering private practitioners, supported by the Municipality of Lavreotiki.

8) **Preventive medical check-up programs** (for scoliosis - kyphosis, visual acuity, body fat measurement, oral hygiene check-up, pediculosis, colorblindness, blood pressure measurement) implemented by the Municipality of Lykovrisi-Pefki, in cooperation with volunteering doctors of Municipal Clinics, targeted to students attending public schools of the said Municipality.

Furthermore, from **school-year 2014 –2015**, the Ministry of Culture, Education and Religious Affairs, in accordance with circular No.187363/ΓΔ4/19-11-2014, has been implementing the «**Social School**» program, in cooperation with the Ministry of Health, the General Secretariat of Sports, the Ministry of Public Order and other bodies concerned. This program also aims at **promoting students' health and quality of life**, through the design and development of actions and events that are included in the school program and are implemented in parallel with the courses. The thematic areas of intervention included in the Social School program are the following: *Sexual Education, Nutrition/Well Being, Information on and Prevention of infectious diseases.*

In this context, actions are implemented in cooperation with specialized professionals of the bodies concerned, the Hellenic Center for Disease Control and Prevention, the Institute of Mental and Sexual Health and the Greek Society for the Study and Treatment of AIDS, aiming at informing students on issues relating to sexual education and prevention of sexually transmitted diseases.

Moreover, we would like to inform you that, during recent years, the Ministry of Culture, Education and Religious Affairs introduced an innovative institution of counselling in the Secondary Education, i.e. «**Youth Counseling Stations**», that operate in the Secondary Education Directorates of the country in order to offer short-term counseling to parents, students as well as teachers. Persons employed at Youth Counselling Stations act as intermediaries-counselors aiming at meeting the psychosocial needs of school units.

Finally, we would like to point out that students have the opportunity to deal with issues relating to health protection through their courses, for example:

- The course of *Physical Training* during the three grades of High School, the chapter entitled: «The Value of Life-long Exercise».
- The course of *Biology* at the first grade of High School, the chapter entitled «Transfer and elimination of substances» and the chapter entitled «Human reproduction». From the Exercise Book, the Unit entitled: «Conception and contraception».
- The course of *Home Economics* at the first grade of High School, the chapter entitled: «Health Education – Prevention of Accidents» and the Chapter «Nutrition».
- The course of *Home Economics* at the second grade of High School, the chapter entitled: « Health Education» (Prevention concerning Health issues, Adolescence and Transgender Relationships – First Aid and Medical Substances – Drugs).
- The course of *Biology* at the third grade of High School, the Unit entitled: «Diseases and factors associated with their occurrence».
- The course of *Biology* at the first grade of General Lyceum, the chapter entitled «Birth control-family planning».

- The course of *Biology* at the third grade of General Lyceum, the chapter entitled «Man and Health».
- The course of *History- General Education* at the third grade of the general Lyceum, the chapter entitled «Culture in the 20th century», (where reference is made to the work of George Papanikolaou and the preventive Pap Test for cervical cancer).

## Article 13 - The right to social and medical assistance

### Paragraph 4 – Application of provisions on social and medical assistance on an equal footing to nationals of other Parties lawfully within the territory of a Party

With regard to the negative conclusion on the above mentioned provision of the ESC due to the lack of adequate information on the provision of emergency social assistance to all illegally staying nationals (including refugees and asylum seekers) who are in need, we would like to inform you of the following:

#### LEGAL FRAMEWORK

- Article 51 of Act **No.4251/2014 (O.G. A' 80/1.4.2014)** «Code for Migration and Social Integration and other provisions», stipulates the following:

«Article 51

#### **Medical care and provisions during the reflection period**

1. During the reflection period, the victims of human trafficking or migrant smuggling shall have access to medical care and the psychological support services provided by the National Health System, Protection and Assistance Units and bodies that cooperate with the above entities, pursuant to the provisions of articles 2, 3 and 4 of Presidential Decree 233/2003, as in force, and by Initial Reception Services.

2. The above persons shall be granted standards of living capable of ensuring their subsistence provided that they do not have sufficient resources.

3. The competent prosecuting, judicial and police authorities shall take due account, by priority, of the safety and protection of such victims, as set out in the relevant provisions. They shall also provide them with translation and interpreting services, information about their legal rights and the services available to them, and the provision of all necessary legal aid».

- Ministry of Health Circular (No.Y1/G.P.109797/2012) on «**Vaccination Program for destitute and uninsured children and adolescents**», stipulates the following:

«Due to an increase in the number of uninsured citizens under the difficult economic circumstances in our Country and in order to ensure Public Health through vaccination of destitute and uninsured population groups as well as of those persons who may not have healthcare coverage for any social security reasons, of children and adolescents **legally and illegally staying in our Country**, free vaccination shall be provided to all the above mentioned persons while vaccines shall be granted by the Ministry of Health, under the National Vaccination Program for Children and Adolescents».

- Ministerial Decision No. G.P./56432 (O.G. B' 1753/2014) «**Conditions for the access of uninsured and indigent citizens to the system of pharmaceutical care**», stipulates the following:

«1. Uninsured Greek nationals, expatriates legally residing in the Greek territory, citizens of EU Member States and **third-country nationals, legally and permanently residing in Greece**, who lack the conditions necessary to obtain the booklet for uninsured individuals, and therefore, are not insured with any public or private institution, as well as insured persons who have lost their social security entitlement rights because

of money owed to Social Security Funds, together with their dependants, **are entitled to free pharmaceutical care.**

2. Physicians of the NHS Hospitals and of public 1st Degree Healthcare provision services of the National Primary Health Network (PEDY) are solely competent to prescribe medicines to the beneficiaries stated in the above paragraph. [...]The beneficiaries shall have access to the whole range of pharmaceutical care that concerns acute incidents, chronic diseases as well as high-value medicines, under the same terms, conditions, procedures and provided for financial charges that apply to insured persons».

- Ministerial Decision No.A3 (c)/GP/23754 (O.G. B' 490/01.04.2015) «**Abolition of 5 euros payment obligation for visits to public structures of the National Health System**».

- Article 7 of the Regulation (EU) No. 233/2014 of the European Parliament and of the Council of 11 March 2014, establishing a financing instrument for development cooperation for the period 2014-2020 stipulates the following:

«Article 7

Global Public Goods and Challenges

1. The objective of Union assistance under the 'Global Public Goods and Challenges' programme shall be to support actions in areas to be drawn from:

(a) Environment and climate change, (b) sustainable energy, (c) human development, including decent work, social justice and culture, (d) food and nutrition security and sustainable agriculture; and **(e) migration and asylum.**

2. Further details of the areas of cooperation referred to in paragraph 1 are set out in Part A of Annex II».

Annex I section A of the above Regulation stipulates the following:

«III. Other areas of significance for development

**a) Migration and asylum**

i) Supporting targeted efforts to fully exploit the interrelationship between migration, mobility, employment and poverty reduction, so as to make migration a positive force for development and reducing 'brain drain',

ii) Supporting developing countries in adopting long-term policies for managing migratory flows which respect the human rights of migrants and their families and enhance their social protection».

Annex II section A of the above Regulation stipulates the following:

**«V. Migration and asylum**

Cooperation in this area intends to strengthen political dialogue, cooperation, exchange of knowledge and experience and the capacities of partner countries, civil society organisations and local authorities in order to support human mobility as a positive element of human development.

**Cooperation in this area, based on a rights-based approach encompassing all human rights, whether civil and political or economic, social and cultural, will address the challenges of migration flows, including South-South migration, the situation of vulnerable migrants such as unaccompanied minors, victims of trafficking, asylum seekers, migrant women, and the condition of children, women and families left in the countries of origin, by:**

a) promoting migration governance at all levels, with a particular focus on the social and economic consequences of migration, and recognising the key role of civil society organisations, including

diaspora, and local authorities in addressing migration as an essential component of the development strategy

b) ensuring better management of migratory flows in all their dimensions, including through enhancing capacities of governments and other relevant stakeholders in partner countries in areas such as: legal migration and mobility; preventing irregular migration, smuggling of migrants and trafficking in human beings; facilitating sustainable return of irregular migrants and supporting voluntary return and reintegration; integrated border management capacities; and international protection and asylum

c) maximising the development impact of the increased regional and global mobility of people, and in particular of well managed labour migration, improving integration of migrants in countries of destination, promoting and protecting the rights of migrants and their families, through support to the formulation and implementation of sound regional and national migration and asylum policies, through integration of the migration dimension into other regional and national policies and through support for the participation of migrants' organisations and local authorities in policy formulation and in the monitoring of policy implementation processes

d) improving a common understanding of the migration and development nexus, including social and economic consequences of government policies, be they in migration, asylum or in other sectors

e) enhancing asylum and reception capacities in partner countries. Cooperation in this area will be managed in coherence with the Asylum, Migration and Integration Fund and Internal Security Fund, with full respect for the principle of policy coherence for development».

- In accordance with Regulation (EU) No.232/2014 of the European Parliament and of the Council of 11 March 2014 establishing a European Neighbourhood Instrument, the following are stipulated:

«Article 2

Specific objectives of Union support

2. Union support under this Regulation shall target in particular: a) ... c) creating conditions for the better organisation of legal migration and the fostering of well-managed mobility of people, for the implementation of existing or future agreements concluded in line with the **Global Approach to Migration and Mobility**, and for the promotion of people-to people contacts, in particular in relation to cultural, educational, professional and sporting activities».

Moreover, Annex II of the above Regulation stipulates the following:

«2. Union support at multi-country level shall, as appropriate, address, inter alia, the following priorities:

- human rights, good governance and the rule of law,
- institutional cooperation and capacity development,
- regional cooperation, in particular in the framework of the Eastern Partnership, the Union for the Mediterranean and the Partnership for Democracy and Shared Prosperity,
- higher education and skills development, students and staff mobility, youth and culture,
- sustainable economic development, trade and private sector development and support to small and medium-sized enterprises,
- the energy sector, including energy networks,
- transport and infrastructure interconnections,
- sustainable management of natural resources, including water, green growth, the environment and climate change adaptation and mitigation,
- support to civil society,
- **mobility and migration management,**

- confidence-building and other measures contributing to the prevention and settlement of conflict».

- Commission delegated Regulation (EU) No.240/2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds, stipulates the following:

“(4) The partners should include public authorities, economic and social partners and bodies representing civil society, including environmental partners, community-based and voluntary organisations, which can significantly influence or be significantly affected by implementation of the Partnership Agreement and programmes. **Specific attention should be paid to including groups who may be affected by programmes but who find it difficult to influence them, in particular the most vulnerable and marginalised communities, which are at highest risk of discrimination or social exclusion, in particular persons with disabilities, migrants and Roma people”.**

- Article 1 of the Regulation (EU) No.1052/2013 of the European Parliament and of the Council of 22 October 2013 establishing the European Border Surveillance System (Eurosur), stipulates the following:

“This Regulation establishes a common framework for the exchange of information and for the cooperation between Member States and the Agency in order to improve situational awareness and to increase reaction capability at the external borders of the Member States of the Union (‘external borders’) for the purpose of detecting, preventing and combating illegal immigration and cross-border crime and contributing to ensuring the **protection and saving the lives of migrants** ("EUROSUR")”.

- Ministerial Decision 16859/EYD&PLAP355 (O.G.B’947/2014) «Co-financing European & Development Program Management Services related to asylum and migration», especially annexes I, II, V:

ANNEX I – PROGRAM AGREEMENT European Economic Area Financial Mechanism for the period 2009-2014

Program Agreement between the Financial Mechanism Committee established by Island, Liechtenstein and Norway and the Ministry of Development and Competitiveness, hereinafter referred to as «National Focal Point», representing the Hellenic Republic, hereinafter referred to as «Beneficiary State» hereinafter both referred to as «Parties» for the financing of the Program «Capacity building of national asylum and migration management systems» hereinafter referred to as the «Program»,

ANNEX II – FINANCIAL SUPPORT PLAN,

ANNEX V – COOPERATION AGREEMENT FOR THE IMPLEMENTATION OF THE PROGRAM:  
“**INSTITUTIONAL FRAMEWORK IN THE ASYLUM AND MIGRATION SECTOR – CAPACITY BUILDING OF NATIONAL ASYLUM AND MIGRATION MANAGEMENT SYSTEMS (SUBPROGRAM B)**”.

## **PROGRAMS**

In accordance to the information provided in the previous Greek report, the **programs of the European Refugee Fund** aim at meeting basic needs of refugees, asylum seekers and displaced persons through the provision of housing, food, clothing, medical care, psychological and legal assistance.

- Concerning the above, it has to be clarified that the **emergency measures** programs implemented in our country during the programming period 2008- 2013, in the context of the European Refugee Fund financing packages, aimed at supporting third-country nationals or stateless persons who entered our country, who may be in need of international protection concerning the above mentioned areas, **irrespective of whether they are legally staying in the country or not**. In accordance with statistical data

kept by the Directorate for Social Awareness and Solidarity, General Secretariat of Welfare<sup>13</sup>, the total number of persons served in the context of actions supported by the European Refugee Fund for the programming period 2008- 2012<sup>14</sup> is presented in the following table:

ACTIONS	2008		2009		2010		2011		2012		Total		TOTAL
	Reg. progr.	Emerg. measures	Reg. progr.	Emerg. measures	Reg. progr.	Emerg. measures	Reg. progr.	Emerg. measures	Reg. progr.	Emerg. measures	Reg. progr.	Emerg. measures	
Accomm.	385	1.597	761		1.143	1.505	632	2.014	526	636	3.447	5.752	9.199
Material aid				2.235	200	8.734		53.235		2.349	200	66.553	66.753
Med-psychol. aid	8.896	1.301	7.719	1.800	6.289	65.188				47.324	22.904	115.613	138.517
Social assistance	18.683	1.889	16.300	173	18.518	1.605	9.311	106	3.195		66.007	3.773	69.780
Social inclusion					2.421		3.459		2.197		8.077	0	8.077
Vocational training	1.992		4.785		1.878						8.655	0	8.655
Cultural assistance	100		805		540		176		225		1.846	0	1.846
<b>TOTAL</b>	<b>30.056</b>	<b>4.787</b>	<b>30.370</b>	<b>4.208</b>	<b>30.989</b>	<b>77.032</b>	<b>13.578</b>	<b>55.355</b>	<b>6.143</b>	<b>50.309</b>	<b>111.136</b>	<b>191.691</b>	<b>302.827</b>

- In the same paragraph it is noted that, in accordance with data submitted by the UN High Commissioner for Refugees, **in 2010 only 865 asylum seekers were hosted in the country, in total.**

- It has to be noted that during the current period the hosting system for asylum seekers and unaccompanied minors has a total capacity of **1.129 persons.**

However, it's worth mentioning, without essentially questioning the remaining capacity of the reception and hosting system compared to the total number of international protection seekers, that reliable conclusions regarding the level of total required capacity may not be drawn immediately based on this deviation, since a set of parameters specifying the **actual demand for hosting services** should be taken into account, including, inter alia, the percentage of beneficiaries who apply for housing (instead of the total number of beneficiaries), the average application processing time by the asylum office, the average time spent in accommodation centers, the decision cancellation rate for placement in accommodation centres, etc.

As an example, the relevant extract from the annual report made by the *office processing housing requests by asylum seekers and unaccompanied minors of the national social solidarity center* for the year 2014 is presented below:

**“Regarding single parent families, our office received 257 applications (by 697 persons). 96,41% of these requests have been met after an average waiting period of 24 days. It is interesting to note the fact that out of the total of placements by category the cancellation rate<sup>15</sup> (especially with regard to families) is**

<sup>13</sup> The Directorate for Social Awareness and Solidarity, General Secretariat of Welfare keeps the said data under its competence as the authority responsible for the European Refugee Fund in Greece for the period 2000- 2013 (Act No.3613/O.G.263/A'/2007/article 28§10/b).

<sup>14</sup> During the current period, the evaluation of actions implemented in the context of the programming year 2013 is under progress.



**very high.** The cancellation of the placement is made either at the initiative of the referring body (for example because of failure to find the person concerned, or due to completion of the family reunification process, etc.), or following refusal of the applicants themselves, for reasons such as finding other type of housing assistance, etc.)”.

- Furthermore, it has to be noted that free access to health services for illegally staying migrants is provided for only in cases of emergency, while the payment of a fee for laboratory tests and medicines is required. Minors up to the age of 14 are excluded from the above conditions of access for whom medical care shall be provided on equal terms with Greek nationals irrespective of their residence status.
  - In accordance with the current legal framework<sup>16</sup>, **minors** have access to the health system (hospitals, infirmaries and clinics), irrespective of whether they hold documents proving their legal entrance and residence in the country. It has to be pointed out that in the case of minors this group of beneficiaries is not limited to those who are under the age of 14.

### National Action Plan on Asylum and Migration

Irregular migration is a major issue in our Country with a humanitarian dimension. Hellenic Police Headquarters, in consultation with the Political Leadership of the Corps, makes continuous efforts and takes all the necessary measures to tackle the phenomenon in a more effective manner, thus ensuring inspections in connection with the legal entry of immigrants in our country, as well as their circulation/movement within the Schengen area.

More specifically, regarding irregular immigrants, refugees and other vulnerable groups, the primary objective of the Hellenic Police is their protection by ensuring adequate living conditions fully compatible with the value of the human being.

Our country, within the framework of the National Action Plan on Asylum and Migration, established seven (7) Pre-departure Detention Centers (P.KE.K.), taking into account the occasional observations made by the European Commission and other International and European Organisations on the prevention of torture and any other inhuman or degrading treatment or punishment (CPT), with a view to improving the reception and detention conditions as well as the protection of human rights. Aliens staying at the said Centres are detained by order of the Authority, since deportation / return decisions have been issued against them that will be implemented provided that they come from countries where repatriation is possible.

In addition to the above, we would like to inform you that aliens staying at Pre-departure Detention Centers (P.KE.K.) have already been examined by medical teams of the Ministry of Health (KE.EL.P.NO.<sup>17</sup>) and by doctors of Non-Governmental Organisations employed at the said Centres and, when required,

CANCELLATION RATES	2012	2013	2014
<b>Unaccompanied minors</b>	23,68%	37,34%	21,80%
<b>Adults</b>	52,38%	63,42%	21,71%
<b>Nuclear families</b>	35,43%	50,00%	74,52%
<b>Single parent families</b>	55,41%	69,31%	54,95%

<sup>16</sup> Act No.3386, article84§1 (O.G.212/A'/2005).

<sup>17</sup> Hellenic Centre for Disease Control and Prevention

they are provided with the necessary medical and pharmaceutical care at the closest Prefectural General Hospitals.

With regard to issues concerning aliens' health care whose release from the Pre-departure Detention Centers is imminent, we would like to inform you that they are examined individually by common teams of competent employees, social workers, psychologists, interpreters and medical staff, under the following criteria:

- a. Length of detention (starting from those who have been detained for 6 months, etc).
- b. Their vulnerability (patients, elderly persons, women, etc.) and
- c. Asylum seekers.

It has to be noted that, in cooperation with the National Center for Health Operations (E.K.EP.Y.) since 01-03-2014, the following Pre-departure Detention Centers (P.K.E.K.) have been staffed with medical personnel (doctors, general practitioners, dermatologists, pulmonologists), and equipped with medical equipment and pharmaceutical materials: Amygdaleza of Attica, Tavros (24, P. Ralli Str.,) of the Attica Aliens Department, Korinthos, the Minor Aliens Detention Facility at Amygdaleza, as well as the detention facility at Elliniko of the Attica Aliens Department. Currently, it is expected that KE.EL.P.NO. teams will undertake the medical and pharmaceutical coverage of all Pre-departure Detention Centers.

Regarding statistical data mentioned in the question on infectious or psychiatric diseases, we would like to inform you that these data are kept by the Units of the Ministry of Health (E.K.EP.Y., KE.EL.P.NO.) or the relevant cooperating NGOs. **More specifically, medical records are kept for every detainee-patient with all medical data concerning them.**

In addition to the above, the provision of health services to immigrants continues either through Non-Governmental Organisations (NGOs) or through the KE.EL.P.NO.

More specifically, regarding the provision of medical and pharmaceutical coverage at the country's points of entry, we would like to inform you of the following:

- At the airports, the provisions of article 4 of the Schengen Treaty are respected together with the instructions of the World Health Organisation (W.H.O.).
- At the islands of Northeastern Aegean that are receiving a massive influx of immigrants, the instructions of the World Health Organisation are taken into account while incoming immigrants are interviewed about their countries of origin and transit, are asked to fill out the relevant WHO forms and are examined by doctors of NGOs, of Health Centers or of Prefectural General Hospitals.
- Moreover, policemen serving at these islands have been trained by doctors of the KE.EL.P.NO. and of the Health Directorate of the Hellenic Police Headquarters and the local Police Departments have been equipped with antiseptics, masks, gloves, goggles, forehead thermometers, rubber boots and aprons.