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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

36th meeting
Strasbourg, 15-18 November 2016

Complaints on stand-by

**Presumed large-scale exploitation and
marketing of protected marine shelled molluscs
in Greece**

- REPORT BY THE COMPLAINANT -

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**RESPONSE TO THE LETTER OF 15-12-2015 OF THE BERN CONVENTION SECRETARIAT IN
RELATION TO THE COMPLAINT N° 2014/6 ON LARGE-SCALE EXPLOITATION AND MARKETING
OF PROTECTED MARINE SHELLED MOLLUSCS IN GREECE**

- Mytilene, 25 February 2016 -

In response to your letter of 15-12-2015 and taking into account the response of the Greek Ministry of Reconstruction of Production, Environment & Energy, Directorate General of Environmental Policy, signed by Mr N. Manalis – Director General of Environmental Policy – I would like to provide some additional information on the large-scale exploitation and marketing of the protected species *Lithophaga lithophaga* in Greece.

First, I would like to respond the Ministry's letter, which without providing solid evidence attempts to downgrade the issue claiming that our research paper¹, on which complaint no 2014/6 was based, is misleading.

- In the Ministry's response, the existing legislative provisions in Greece for the protection of the specific species are listed as a proof of the “pioneering” actions of Greece to stop the illegal exploitation of the species. This official response precisely highlights the roots of the conservation issues in Greece. Just by passing legislation, illegal exploitation will not be eliminated. Without appropriate enforcement measures and the establishment of control mechanisms, illegal exploitation and marketing of date mussels will remain. Greece does not lack legislation but rather lacks adequate enforcement of the existing laws.
- In the Ministry's response, it is stated that the complaint is “misleading as the results of the paper depend on the representative choice of localities”. This is an unacceptable and unsubstantiated statement that ignores the methodology followed in our study. The seafood restaurants were not pre-selected based on previous information about illegal marketing of shelled molluscs but were selected ‘on the spot’, i.e. we selected a large number of locations and then visited all seafood restaurants that could be found in each of these locations. A large number of interviews (219) was conducted in 92 localities well covering all marine subregions of Greece. Hence, our sample is representative of the situation in the entire country, and the finding that 22.8% of the seafood restaurants serve regularly (11.4%) or occasionally date mussels is not an overestimate. On the contrary, due to the possibility that some interviewees hesitated to give honest answers on the illegal marketing of the species, this could be an underestimation of the real extent of the problem.
- In the Ministry's response, it is stated that they “firmly disagree” with the conclusion of widespread exploitation and marketing of date mussels in Greece but they provide no data and evidence to support their disagreement.

In your letter you asked for new or more recent data. Unfortunately, it was not possible to repeat such a large-scale survey to update our previous results. However, we managed to collect relevant information from the web. We investigated web pages of restaurants, trip advisors, restaurant reviews, blogs etc, and found a wealth of information on the marketing of date mussels (but also of the fan mussel, *Pinna nobilis*; also a protected species according to national/European legislation and international conventions) in Greek seafood restaurants. Surveillance and enforcement is so weak that many restaurants do not hesitate to promote in their menus (often also online) a variety of dishes with date mussels. In one case there was also a delivery service – dishes with date mussels can be ordered and delivered at home as easy as ordering a pizza! Most of these websites and posts in the internet are relatively recent (of the last 2 years). We also received information from colleagues that have very recently (during the last few months) visited restaurants that serve date mussels. Specifically, we found (Table 1):

¹ Katsanevakis S, Poursanidis D, Issaris Y, Panou A, Petza D, Vassilopoulou V, Chalداiou I, Sini M, 2011. “Protected” marine shelled molluscs: thriving in Greek seafood restaurants. *Mediterranean Marine Science* 12(2): 429–438.

- Date mussels have been served in restaurants in 33 localities, including 12 in the wider Athens region and suburbs, and 21 in the rest of Greece (see Figure 1).
- In some localities (New Artaki, Lampsakos, Chalkida) date mussels are regularly served in dozens of seafood restaurants.
- There were many sites in the internet with photos of cooked date mussels in Greek seafood restaurants but also with recipes for cooking date mussels.
- Although we did not specifically search for *Pinna nobilis*, we found it to be served in 3 localities.

Recently in Greece, systematic effort has been made, in terms of institutional strengthening, for the establishment of a fisheries control and enforcement system, in order to ensure compliance with the rules of the common fisheries policy. Specifically: a) a Single Control Authority has been founded, as defined by article 5(5) of Council Regulation (EC) 1224/2009, for the coordination of the control activities of all national control authorities, b) a special Department for Conduction of Inspections at sea, in ports, during transport, on processing premises and during the marketing of the fisheries products has been founded, according to article 74(2) of Council Regulation (EC) 1224/2009 (both authorities fall under the jurisdiction of the Ministry of Rural Development and Food, according to presidential degree 107/2014) and c) a national system of administrative sanctions for serious infringements has been established, according to the provisions of article 44 of Council Regulation (EC) 1005/2008, by the ministerial decision n.1750/32219/2015.

Despite the above mentioned actions, the fact that protected marine shelled molluscs are still widely exploited and marketed in Greece, emphasizes the non implementation of rules and laws and also the malfunction of competent structures/authorities for the fisheries control and enforcement.

In conclusion, weak enforcement and ineffective surveillance has led to a bad mentality of non-compliance. According to our information, the situation has become worse in recent years. Date mussels are not only served in a large number of seafood restaurants in many localities, but serving, marketing and cooking of date mussels is also widely advertised and promoted through the internet.

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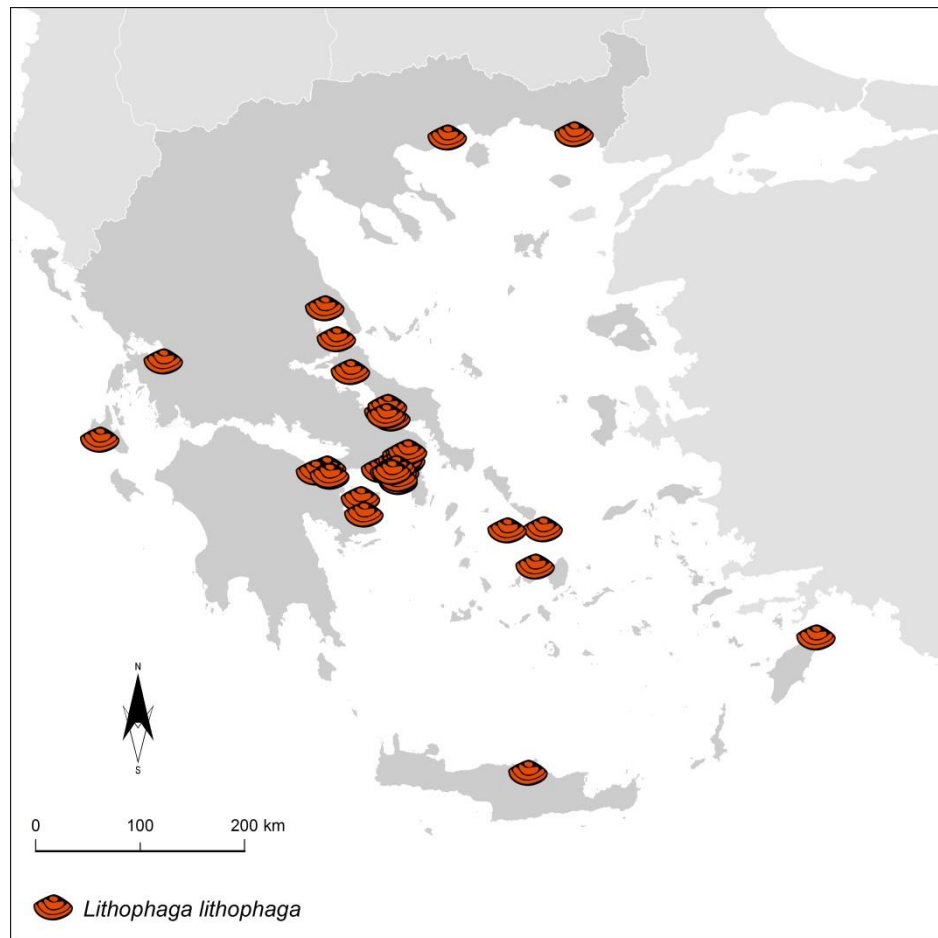


Figure 1: Localities in Greece, where there are recent records of seafood restaurants serving date mussels (data retrieved from the internet and personal communications). It has to be noted that this map is not based on an exhaustive search, and thus it underestimates the geographical range of illegal marketing and serving of date mussels in restaurants.

Table 1: Information retrieved from the web and from personal communications on the serving of date mussels and fan mussels in Greek restaurants

Location/Name of restaurants serving date mussels or fan mussels	Comments	Source
restaurant "Kritamo" Volos	date mussels are served	https://www.e-table.gr/restaurant/kritamo
restaurant "Paramalo", Nea Kifisia (Athens)	date mussels are served	http://www.lifo.gr/team/taste/50717
restaurant "Strofi", Perama	date mussels are served	http://www.lifo.gr/team/taste/50717
restaurant "Strofi", Perama	date mussels are served	http://www.culinarybackstreets.com/athens/2013/strofi/
restaurant "Psariston", Neo Irakleio	date mussels are served	http://www.lifo.gr/team/taste/50717
restaurant "Psariston", Neo Irakleio	date mussels are served	http://foodforthoughtathens.blogspot.gr/2010/07/blog-post_19.html
Nea Artaki	date mussels are served	http://www.culinarybackstreets.com/athens/2015/cb-on-the-road-6/
Agkistri (Saronikos Gulf)	date mussels are served	https://picasaweb.google.com/117366078117131024067/BuzzMobile#5489683387497526834
Barbarossa restaurant in Paros	date mussels are served	http://www.greeka.com/cyclades/paros/island/paros-restaurants/naoussa-restaurants/barbarossa.htm
In Rhodes Town Alexis taverna	date mussels are served	http://www.europeandestinations.com/cms/4052/Web_Content.aspx?CMS&wh=0&wf=0
Nea Artaki	date mussels are served	https://www.instagram.com/p/9yGqFHRfiJ/
Kyani Akti, Argostoli, Kefalonia	date mussels are served	https://foursquare.com/v/%CE%BA%CF%85%CE%B1%CE%BD%CE%AE-%CE%B1%CE%BA%CF%84%CE%AE/4be55b252457a593fe5aab15
restaurant "Varkoules", Metamorfosi	date mussels are served	https://foursquare.com/v/barkoules/4b094520f964a520191523e3
restaurant "Batis", Nea Lampsakos		http://pieria-gr.blogspot.gr/2011/08/blog-post_4973.html
Lampsakos	date mussels are served in many restaurants	Nikos Katsiaras, personal communication
Nea Artaki	date mussels are served in many restaurants	Nikos Katsiaras, personal communication
restaurant Dourabeis Microlimano (Piraeus)	date mussels are served	https://panathinaeos.wordpress.com/2009/06/28/dourambeis-fish-restaurant/
restaurant Dourabeis Microlimano (Piraeus)	date and fan mussels are served	https://www.facebook.com/pages/Dourabeis-Estiatorio/409519999143637
restaurant Dourabeis (Neo Psychiko)	date and fan mussels are served	http://www.clickatlife.gr/geusi/story/30166
restaurant Dourabeis (Neo Psychiko)	date and fan mussels are served	http://www.arttable.gr/estiatoria_ellada_athna/article/8057/athna-pou-tha-fate-to-kalutero-psari
restaurant Argoura - Tzitzifies	date mussels are served	http://www.arttable.gr/estiatoria_ellada_athna/article/8057/athna-pou-tha-fate-to-kalutero-psari

restaurant Argoura - Tzitzifies	date mussels are served - the chef mentions in this interview that date mussels are fished by Kalymnian fishermen	http://popaganda.gr/argoura/
restaurant Argoura - Tzitzifies		http://www.greecessence.com/wp-content/uploads/2014/11/2012_02_17_AN-Simply-divine-treasures-of-the-sea.pdf
restaurant Argoura - Tzitzifies	date mussels are served	http://www.clickatlife.gr/geusi/story/26350
restaurant "Klimataria" - Nea Artaki	date mussels are served	http://websta.me/p/1174589845541353501_43094477
Chalkida	date mussels are served	http://websta.me/p/1098495629910215350_1620281921
Rovies, Evvoia	date mussels are served	http://websta.me/p/1080325506731685794_2207735588
Lefkadi, Evvoia	date mussels are served	http://websta.me/p/1047874501809105550_986260345
restaurant "Teskos" - Nea Artaki	date mussels are served	http://websta.me/p/986863582056937978_43094477
restaurant "Teskos" - Nea Artaki	date mussels are served	http://www.culinarybackstreets.com/athens/2015/cb-on-the-road-6/
restaurant "Kavos", Isthmia, Korinthia	date mussels are served	http://websta.me/p/706530274030004459_22946929
Kavos, Isthmia, Loutraki 20100, Greece		https://www.tripadvisor.co.uk/LocationPhotoDirectLink-g1188932-d3583339-i159093958-Kavos_Fish_Tavern-Isthmia_Loutraki_Corinthia_Region_Peloponnese.html
Mykonos	date mussels are served	http://websta.me/p/519420054901793343_144877215
Mykonos	date mussels are served	K. Demiroopoulos, personal communication
restaurant "Alokoto" - Vrilissia	date mussels are served	http://www.regroup.gr/default/388/city/1/deals/381/to-alkokoto-tsipouradiko/
restaurant "Fishalida" - Athens center	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613
restaurant "Mpalkonistis Kyklades", Vyronas (Athens)	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613
restaurant "Mikres Kyklades", Ilioupoli (Athens)	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613
restaurant "Aigaiο", Ano Vrilissia (Athens)	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613
restaurant "Monemvasia" Nea Kifisia (Athens)	date mussels are served	http://www.athensmagazine.gr/restaurants/articles/1613
restaurant "Paramalo", Nea Kifisia (Athens)	date mussels are served	http://www.pirouni.gr/2014/03/%CF%80%CE%B1%CF%81%CE%AC%CE%BC%CE%B1%CE%BB%CE%BF/
Syros	date mussels are served	Yiannis Issaris, personal communication
restaurant "Asterias", Nea Makri	date mussels are served	http://www.in2life.gr/delight/eat/article/281999/10-tavernes-kai-mezedopoleia-dipla-sth-thalassa.html
restaurant "Koursaros", Drosia (Athens)	date mussels are served	http://www.estiatoria.gr/estiatorio/83/%CE%BA%CE%BF%CF%85%CF%81%CF%83%CE%B1%CF%81%CE%BF%CF%82

restaurant "Mouria", Nea Artaki	date mussels are served	http://www.clickatlife.gr/geusi/story/26350
Food Mafia, Glyfada	date mussels are served	http://www.estiatoria.gr/estiatorio/1593/food_mafia_%CE%B3%CE%BB%CF%85%CF%86%CE%AC%CE%B4%CE%B1
restaurant "Edodi", Koukaki	date mussels are served	http://www.athinorama.gr/restaurants/article/xrusoi_sko_ufoi_2011-10245.html
Kapetanios, Chalkida	e-food, delivery of seafood - two dishes of date mussels (8.50 Euros) are included in the catalogue	https://www.e-food.gr/delivery/chalkida/kapetanios
restaurant "Agkistri", Glyfada	date mussels are mentioned in the catalogue but it could be a different bivalve species	http://toagistri.gr/?p=61
restaurant "Trata", Athens	date mussels are served	https://www.tripadvisor.com.gr/ShowUserReviews-g189400-d2580508-r247008163-Trata_Fish_Tavern-Athens_Attica.html
restaurant "Ladokola", Irakleio, Crete	date mussels are served	https://www.facebook.com/102833059754151/photos/pb.102833059754151.-2207520000.1454671111./902249433145839/?type=3&theater
restaurant "Ladokola", Irakleio, Crete	date mussels are served	https://www.facebook.com/102833059754151/photos/pb.102833059754151.-2207520000.1454671150./752798861424231/?type=3&theater
restaurant "Manolas", Trikeri	date mussels are served	https://www.e-table.gr/restaurant/manolas-o
restaurant "Agkyra", Nea Artaki	date mussels are served	http://www.zitas.gr/place/agyra/
restaurant "Maistrali", Loutraki	date mussels are served	http://maistrailoutraki.gr/downloads/menu_gr.pdf
restaurant "Palaiokastro", Methana	date mussels are served	http://www.saronicmagazine.com/?page_id=608
restaurant "Takis", Lechaio (Korinthia)	date mussels are served	http://www.tovima.gr/vimagourmet/restaurants/article/?a_id=461016
Restaurant "Ta Filarakia", Makri, Alexandroupoli	date mussels are served	http://www.tieda.gr/el/%CE%B4%CE%B7%CE%BC%CE%BF%CF%83-%CE%B1%CE%BB%CE%B5%CE%BE%CE%B1%CE%BD%CE%B4%CF%81%CE%BF%CF%85%CF%80%CE%BF%CE%BB%CE%B7%CF%83/%CE%BA%CE%B1%CF%84%CE%B1%CE%BB%CE%BF%CE%B3%CE%BF%CF%83-%CE%B5%CF%80%CE%B9%CF%87%CE%B5%CE%B9%CF%81%CE%B7%CF%83%CE%B5%CF%89%CE%BD/item/141-%CF%84%CE%B1-%CF%86%CE%B9%CE%BB%CE%B1%CF%81%CE%B1%CE%BA%CE%B9%CE%B1
restaurant "Kakias", Salamina, Athens	date mussels and fan mussels are served	https://www.e-table.gr/restaurant/kakias-o
Kavala, Nea Peramos	seafood restaurant serving fan mussels	http://newharpas.blogspot.gr/2013/08/blog-post_29.html

Volos	seafood restaurant serving fan mussels	http://www.tsipouradikavolou.gr/?project=%CF%84%CE%BF-%CF%80%CE%B1%CE%BB%CE%B9%CE%BF-%CE%BB%CE%B9%CE%BC%CE%B1%CE%BD%CE%B9
restaurant "The Sea Star", Rhodes	seafood restaurant serving fan mussels	Panayotis Anastopoulos, personal communication
Recipes/images/other	Comments	Source
Perama	online article on the Greek shell-fisheries - fishing of date mussels and fan mussels are mentioned	http://www.perivolos.gr/news_info.php?data_id=34072&timitat1=18272&timitat2=26618&timitat3=0&timitat4=0&timitat5=0&timitat6=0&timitat7=0
recipes	online recipes for date mussels	http://www.letscook.gr/recipes/psarika/ostrakoeidh/petrosolhnes/spaggeti-me-petrosolines.htm
recipes	online recipes for date mussels	http://www.mytaste.gr/a/%CF%80%CE%B5%CF%84%CF%81%CE%BF%CF%83%CF%89%CE%BB%CE%AE%CE%BD%CE%B5%CF%82.html
recipes	online recipes for date mussels	http://www.athinorama.gr/umami/food/articles/?id=2005070
recipes	online recipes for date mussels	http://www.tastefull.gr/freska-ostraka-neraki-loutropyrgos
recipes	online recipes for date mussels	http://syntageskardias.blogspot.gr/2011/07/blog-post_06.html
Social media images		http://igaddict.com/petrosolines/
Social media images		https://www.instagram.com/p/BBM-z3ERfgd/
used as bait	discussed in a blog	https://www.psarema.gr/sizitisis/dolomata/234536-petrosolinas
used as bait		http://www.otithess.gr/katastimata1-b.php?big=1&katigoria=467&fotomeg=9&katastima=3283