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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

46th meeting

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Open file: 1986/8

**Recommendation No.9 (1987) on the protection of *Caretta
caretta* in Laganas Bay, Zakynthos (Greece)**

- REPORT BY THE COMPLAINANT -

Document prepared by MEDASSET

Update for the Autumn Bureau Meeting**31 July 2026****UPDATE REPORT BY THE NGO****Marine Turtle Conservation in the Mediterranean****LOGGERHEAD SEA TURTLE (*CARETTA CARETTA*) CONSERVATION
MONITORING
IN ZAKYNTHOS (LAGANAS BAY), GREECE**

*Document presented by
MEDASSET - the Mediterranean Association to Save the Sea Turtles*

*for the 46th Standing Committee Meeting of the Contracting Parties to the Convention on
the Conservation of European Wildlife and Natural Habitats (Bern Convention)*

MEDASSET hereby submits an update report to the 3rd Bureau Meeting of the Bern Convention (22-24 September 2026) on the conservation status of sea turtle nesting beaches in Zakynthos, Laganas Bay, Greece. The report was made possible by a grant from Aktionsgemeinschaft Artenschutz (AGA), www.aga-artenschutz.de.

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SUMMARY

Our summer 2026 assessment incorporates findings we observed on June, during our on-site visit. On the positive, we observed improvements on the management measures for some of the six protected nesting beaches, such as increased cordoning of the nesting areas at the back of most of the beaches, more and new signs, and increased daytime warden presence. However, the warden presence was absent at nighttime on most nesting beaches throughout the whole of Zakynthos National Marine Park (ZNMP). Due to the small number of beach wardens, their presence is insufficient for the effective enforcement of management measures. We observed that the absence of wardens after sunset resulted in people visiting the nesting beaches after the beach closure hours. We present relevant documentation from Kalamaki beach and Gerakas beach. In the maritime area, we observed rampant violation of the rules and regulations controlling marine traffic and sea turtle spotting by tourists. Marine traffic remains extremely high, and we observed

an alarming number of boats dangerously approaching the sea turtles for touristic purposes. Illegal developments in the ZNMP remain, even though the courts have ordered their demolition and the restoration of the area between Gerakas and Dafni. Regulations and management measures that apply within the ZNMP are either not enforced or are not enforced consistently and effectively. Thirty-nine years since Recommendation No. 9 (1987) was adopted by the Bern Convention Standing Committee and twenty-four years since Greece was condemned by the European Court of Justice (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62000CJ0103>), the Government has yet to adequately secure the nesting beaches in Laganas Bay against human pressure and development.

MEDASSET calls upon the authorities to:

- Increase and ensure a stable funding to the Management Unit of Zakynthos and Ainos National Parks and Protected Areas of the Ionian islands one of Natural Environment and Climate Change Agency (NECCA) units, in particular for warden resources for adequate marine and terrestrial protection of the nesting beaches and maritime area on a 24/7 basis during the nesting season of the *Caretta caretta*.
- Develop an effective wardening system based on the active involvement and coordination of competent authorities and the strengthening and clear determination of enforcement responsibilities and competences.
- Increase enforcement of the National and ZNMP regulations, especially within the maritime area.
- Take action to permanently cease illegal business operations in Marathonisi and Dafni and restore the site to its natural state.
- Impose appropriate fines and penalties to deter and prevent further and continued violations throughout the entire protected area.

MEDASSET calls upon the Bern Convention Standing Committee to:

- Discuss the case file at the 46th Meeting of the Standing Committee and the upcoming Bureau meeting.
- Continue to follow-up with the Greek Government with Recommendation No 9, especially regarding Measure No 1 about Dafni and the progress of the implementation of the National Action Plan (which was adopted in 2021, Government Gazette B 3678/10-08-2021) and in particular measures regarding the marine protected zones.
- Conduct an On the Spot Appraisal (OSA), as was requested to the Greek authorities and denied in 2026.
- Monitor the preparations for a new offshore hydrocarbon exploration in the Ionian sea:

Recent policy developments in Greece indicate a renewed governmental commitment to offshore hydrocarbon exploration in the Ionian Sea.

On 27 March 2026, the Minister of Environment and Energy, Stavros Papastavrou, announced that the final agreement for the *Stena DrillMAX* drilling rig was expected to be signed in April 2026, confirming that Greece's first offshore exploratory drilling campaign in the Ionian Sea is scheduled for the first quarter of 2027. The Minister also stated that baseline environmental studies had already commenced in preparation for the project.

Throughout 2026, the Ministry of Environment and Energy reaffirmed that offshore hydrocarbon exploration remains a strategic priority within Greece's national energy policy. The government has continued to promote cooperation with international energy companies, including ExxonMobil, HELLENiQ Energy, Energean and Chevron, framing hydrocarbon development as an important component of the country's energy security and economic strategy.

A further development occurred on 28 May 2026, when the Ministry announced Chevron's participation in Block 10, an offshore concession located in the southern Ionian Sea, off the Kyparissiakos Gulf. Although this decision concerns a different concession area and does not directly affect the waters surrounding Zakynthos, it demonstrates the continued expansion of offshore hydrocarbon activities in the wider Ionian region. <https://www.euronews.com/business/2026/05/29/chevron-moves-into-greek-offshore-gas-exploration-as-europes-energy-focus-shifts-east>

DETAILED UPDATE

One of the most important Mediterranean's loggerhead nesting area, located in Laganas Bay at Zakynthos, consists of six discrete nesting beaches: East Laganas, Kalamaki, Sekania, Dafni, Gerakas and Marathonisi islet. The maritime area of Laganas Bay is divided into three zones with different protection levels (Fig. 1). See MEDASSET 2009 Update Report for a more detailed description of the site <https://medasset.org/el/update-report-on-marine-turtle-conservation-in-zakynthos-laganas-bay-greece-2009/>.

MEDASSET visited the Zakynthos National Marine Park (ZNMP) in June 30th 2026 to assess and document the conservation status of the protected nesting beaches as well as the maritime area. It is important to note that visitor numbers continue to increase each year, exerting tremendous pressure on the ZNMP (Fig 2). We provide herein our survey findings in relation to the measures under Recommendation No. 9 (1987), the enforcement of the ZNMP management measures and developments within the framework of National legislation (all photos were captured by MEDASSET unless stated otherwise).

Survey observations on the implementation of Recommendation No. 9 (1987):

1. ***Remove the prefabricated houses in Dafni:*** Thirty-nine years since Rec. No. 9 was adopted, the illegal development and destruction of the protected sand dune system directly behind Dafni nesting beach has expanded and continued. The houses are no longer prefabricated but modern and permanent structures. The natural sand dune system is significantly destroyed. It has been transformed from its natural state by the illegal businesses of taverns and accommodation, which continue to operate unhindered (Fig. 3). Additional touristic facilities presenting further risks to the turtle nesting activity also still exist on the land directly behind the nesting beach. We observed approximately 380 umbrellas and 744 sunbeds, contrary to the PD / management measures that allows 100 persons in the beach and no sunbeds at all (Fig. 4). In addition there is proliferation of non-indigenous plant species (Fig. 5). It should be noted that there was no warden present at the beach of Dafni at the day we monitored the area (Fig. 6). On the positive side all showers were moved further inland, thus reducing water runoff on the nesting

beach.

2. *Remove trees and ban and penalise the use of deck chairs, sunshades and pedalos on the nesting beaches of Gerakas, Kalamaki, eastern Laganas and Marathonisi;*

The legal limits for the maximum number of visitors allowed at one time on the nesting beaches, the number of sunbeds and umbrellas and the maximum number of boats allowed in certain locations are defined in the protective management measures of ZNMP. Adherence and enforcement to these protective measures were not observed in most areas of the ZNMP during our assessment.

Maximum Visitor Numbers: Dafni's visitors' count greatly exceeded the legal limit of the maximum of 100 visitors, with our surveyor counting 359 people present at 17:00 on 30th June 2026. There were no measures for maintaining safe distances of visitors from nests (Fig. 5 & 7), other than the cordoning and signage on each individual nest. Visitors are not only free to roam everywhere and in very close proximity to the caged nests, but also it is often recorded that the red/white perimeter tape, added as additional protection for the nests is either totally removed or moved closer to the cage, reducing the protected area around the nest. The number of visitors counted at Gerakas beach (274 at 17:15 30th June) did not exceed the maximum allowance of 350, and in Marathonisi Island it did not exceed the maximum allowance of 200 people (140 persons at 13:00 30th June 2026).

Maximum Umbrellas/ Sunbeds: Across Laganas East and Kalamaki nesting beaches the regulations permit a total of 150 umbrellas and 300 sunbeds. Our surveyor counted 124 umbrellas and 204 sunbeds (Laganas East: 96 umbrellas and 144 sunbeds; Kalamaki: 30 umbrellas and 60 sunbeds), which did not exceed the specified limits. However, the sunbeds on Laganas East, Kalamaki and Gerakas were not removed from the front of the beach at night and only some of them were placed on their sides *in situ*. (Fig. 8). This continual failure to completely remove the sunbeds from the front of the beach, reduces the available space for emerging females to reach suitable nesting areas at the back of the beach.

Maximum number of Boats at Marathonisi: A maximum number of 10 boats are allowed at Marathonisi at any time, our surveyor counted 6 professional and private hire boats anchored on the nesting beach at 13:00 on 30th June 2026 (Fig. 9).

Illegal developments in other areas of the ZNMP

- The illegal developments that have occurred within the protected ZNMP boundaries remain. Two illegal buildings at Gerakas constructed in 2017, a stable (150m²) and a house (80m²) (see T-PVS/Files 2018 21) have not been demolished and the site has not been restored.
- The restoration of the illegal landfill that operated within the ZNMP boundaries and the Natura 2000 site just started, despite its closure since December 2017. For this reason, the European Commission referred Greece to the Court of Justice of the EU in November

2023 for non-compliance with its previous ruling (C-600/12) requesting the imposition of a fine.¹ It is too early to report on the restoration progress.

- The restoration of the illegal landfill that operated within the ZNMP boundaries and the Natura 2000 site just started, despite its closure since December 2017. For this reason, the European Commission referred Greece to the Court of Justice of the EU in November 2023 for non-compliance with its previous ruling (C-600/12) requesting the imposition of a fine.² It is too early to report on the restoration progress.
- The restoration of the illegally constructed road between Dafni and Gerakas, which occurred in December 2015 within the ZNMP and partially within the NATURA 2000 site, is still pending. Irrespective of the non-action by the perpetrator to restore the site, alternative measures that are available to the Greek Ministry of Environment and Energy to ensure the restoration of the site, have not been applied. In fact, despite the order of restoration issued by the authorities in 2018, the perpetrator expanded the road in March and April 2018.

The Coordination Office for the Implementation of Environmental Liability (COIEL, known in Greek with the acronym SYGAPEZ) issued in August 2018 its decision in accordance with Directive 2004/35/EC, for which the perpetrator is legally obliged to restore the whole area at his own expense. Furthermore, in 2018, an administrative fine of 200.000 Euros was imposed by the Regional Authority. However, it failed to deter the perpetrator/landowner, who continued the roadworks in January 2021 (see MEDASSET letter dated 26 Feb 2021). In April 2022, following an administrative appeal by the landowner, the fine was reduced by the competent authority from 200.000 to 10.000 Euros.

MEDASSET and WWF Greece immediately challenged the reduction of the fine before the competent Administrative Court and notified the Natural Environment and Climate Change Agency (NECCA). Following the subsequent proceedings, the Administrative Court of First Instance of Pyrgos issued Decision A259/2026 on 18 June 2026, rejecting the action brought by WWF Greece and MEDASSET on the grounds that the organisations lacked the required legal standing to challenge the administrative act. The Court therefore did not examine the merits of the case or the lawfulness of the reduction of the administrative fine. The environmental organisations reserve all their rights against this decision.

In parallel, in January 2024, the Administrative Court of first instance of Pyrgos annulled the administrative fine of €10,000. In April 2024, WWF Greece and MEDASSET filed a third-party complaint contesting both that decision and the jurisdiction of the Administrative Court of Pyrgos. The latter was rejected by the Administrative Court of Pyrgos Decision A7/2025 on 9 January 2025. MEDASSET and WWF Greece filed an appeal against this decision before the Administrative Court of Appeal of Patras on 27 March 2025. The case is still pending without a scheduled hearing date until today.

Furthermore, the Criminal Court of Zakynthos convicted the landowner on 9 July 2024 and sentenced him to 14 months' imprisonment, without recognising any mitigating circumstances, for the environmental degradation caused by the illegal works carried out in 2018. The conviction was upheld on appeal by the Criminal Court of Appeal of Patras on 9 December 2025. It should be noted that the landowner had already been convicted

¹https://ec.europa.eu/commission/presscorner/detail/en/IP_23_5444

²https://ec.europa.eu/commission/presscorner/detail/en/IP_23_5444

for the illegal works undertaken in 2015-2016 by a final and irrevocable judgment of the Greek Supreme Criminal Court.

Despite these judicial developments, no effective restoration of the damaged habitat has taken place. Furthermore, there is no evidence that the competent authorities have completed the procedure required under Articles 9 and 10 of Presidential Decree 148/2009 to determine and implement the final restoration measures, despite this being expressly required by the 2018 COIEL decision. In July 2026, MEDASSET submitted a formal request for access to environmental information to the Ministry of Environment and Energy (COIEL), seeking information on the implementation of the 2018 decision. The request referred to whether the restoration study submitted by the landowner in 2023 had been assessed, whether compliance inspections had been carried out, whether the competent advisory committee had been convened to determine the restoration measures, and whether any further administrative sanctions had been imposed. More than ten years after the first illegal works and almost eight years after the adoption of the 2018 environmental liability decision, the damaged site has still not been restored, and the restoration obligations remain unimplemented.

MEDASSET and WWF Greece remain committed to pursuing all available legal and administrative avenues to ensure the effective implementation of the restoration measures and full accountability for the environmental damage caused.

- The illegal construction in Marathonisi island has stopped by a temporary order of the municipality since spring 2025. The owner and perpetrator challenged this order at court, but the challenge was denied by the court. This is an ongoing threat and we follow it closely. During our survey we did not see any further construction (Fig. 20).

Observations on the enforcement of ZNMP conservation management measures and impacts:

- At the time of our survey there were only 15 wardens employed, six worked the day shift, two were on boat duty and three worked the night shift, and the rest had administrative duties, a number completely inadequate! Considering that in the early 2000s there were close to 100 wardens, the need to hire replacements is critical! There are nine warden huts located across the six nesting beaches to accommodate the wardens and allow for 24/7 warden protection; however, the presence of the wardens observed during the 2026 survey was still limited and not consistent across the nesting beaches. This is mainly due to lack of financial and human resources in the Management Unit of the ZNMP. During the day, no wardens were observed at Dafni, Marathonisi and Gerakas beach (Figs. 6, 10 and 11). At Gerakas beach the warden remained at the guardhouse away from the beach. At sunset, two wardens were observed actively removing people from Laganas and Gerakas nesting beaches. However, the absence of a warden at Kalamaki and Gerakas before and after the beach closure hours resulted in people accessing the nesting beach (Fig. 11 & 12). The presence of visitors on the nesting beaches after sunset, poses a great risk to nesting activity, as the disturbance can prevent females from emerging onto the beach, or cause them to abandon their nesting attempt.
- During the day of our visit, no warden was observed on Marathonisi (Fig. 13). Notably, neither a guard nor an information kiosk was present this year. One warden was observed patrolling Laganas East, actively removing people from the back of the beach. However, at

Laganas Beach, sand sculptures and sand castles had not been flattened (Fig. 14). Although hatchling emergence had not yet begun at the time of our visit, these structures should be removed before the onset of the hatching season to ensure an unobstructed route for hatchlings to reach the sea.

- In Gerakas Beach, in addition to the permanent furniture (50 umbrellas and 112 sunbeds), the visitors used private umbrellas (we counted 26 which is not permitted according to the PD), (Fig. 15) thus putting the nests in the no caging areas at high risk.
- The cordoned roped areas, to zone the nesting areas at the back of the beach, were present at Marathonisi, Gerakas Kalamaki and Laganas East.
- Turtle Spotting regulations were violated with up to five boats observed encircling less than 2m from a turtle, when only two boats are allowed at one time for up to 10 mins at a minimum distance of 15m. The turtles are seriously disturbed and distressed by these violations. Non-compliance with these regulations is a common occurrence during the summer months. No enforcement actions have been taken to prevent the serious disturbance of marine turtles by turtle spotting activities leading to a sense of impunity and continuation (and even increase) of infringement incidents (Fig. 16).
- It is apparent that there is a complete disregard of the protective management measures of maritime activity within the Bay. Of great concern is the continuation of non-compliance to the 6 knot speed limit to the safety of the nesting population within the ZNMP (Fig. 17). Numerous boats were observed greatly exceeding the speed limit and numerous incidents of boat strikes have been recorded (Fig.18).

Observations on other activities and impacts:

- In January 2023, the Special Environmental Study (SES) concerning the Natura 2000 areas of the Regional Units of Corfu, Kefalonia, Ithaca, Lefkada and Zakynthos was released for public consultation. This study remains under preparation and has not yet been approved.
- Separately, a distinct Special Environmental Study (SES) for the Ionian National Marine Park was released for public consultation in September 2025 and was approved by the Ministry of Environment and Energy in December 2025. This SES covers the marine area of the Park, including the approximately 80 loggerhead turtle nesting beaches. The terrestrial areas located behind these nesting beaches will be addressed through the broader Natura 2000 SES currently under preparation. However, the institutional designation process has not yet been completed, as the corresponding Presidential Decree and Management Plan have yet to be adopted. Consequently, the revised zoning and management measures have not yet entered into force. MEDASSET, together with WWF Greece and ARCHELON, submitted comments during the public consultation. We expressed concerns that the proposed zoning framework fragmented protected areas, permitted incompatible land uses within protection zones, excluded ecologically important areas from the strict protection regime, and allowed the continuation of existing developments, including long-standing illegal infrastructure, such as businesses operating behind Dafni Beach, without adequately reflecting the conservation requirements of protected habitats and species. Concerns also remain regarding the effectiveness of the proposed measures for

the protection of *Caretta caretta*, particularly on the nesting beaches and marine area of Laganas Bay.

- <https://ypen.gov.gr/dimosievontai-oi-eidikes-perivallontikes-meletes-epm-tou-ethnikou-thalassiou-parkou-ioniou-kai-tou-ethnikou-thalassiou-parkou-notiou-aigaiou-1-noties-kyklades>

MEDASSET commented on the problematic approach of zoning fragmentation suggested by the SES.

- The Greek Government initiated the legal process for the establishment of two new National Marine Parks, one in the Ionian Sea and one in the Aegean Sea, by publishing the corresponding Special Environmental Studies (SES) for public consultation in 2025. Following the consultation process, the Ministry of Environment and Energy approved the Special Environmental Studies. However, the designation process has not yet been completed, as the relevant Presidential Decrees and Management Plans remain pending. The official establishment of the two marine parks will depend on the adoption of these legal instruments and the subsequent implementation of the proposed conservation and management measures.
- Although no new exploration licence or drilling activity has been specifically announced for the waters adjacent to Zakynthos in 2026, these developments illustrate the Greek government's continued commitment to expanding offshore hydrocarbon exploration in the Ionian Sea. This broader policy context is relevant when assessing potential cumulative pressures on ecologically sensitive areas, including the National Marine Park of Zakynthos and nearby Natura 2000 sites.
- Snapshots collected from Instagram videos (Instagram account: (@isabelszakynthos) show fireworks being shot right into the sea on Zante Beach on Jun 22, 26 and July 7, 2026. (Fig.19)
- Cars, car marks and horses were seen behind the guard house at the old Zante beach in Kalamaki. Images (Fig.20) depict these activities as well as the damage done to the sand dunes.

ANNEX: BACKGROUND

For a full description of the site and of the case background see MEDASSET 2009 Update [Report](#).

Since 1988, MEDASSET in collaboration with ARCHELON and WWF Hellas, has lobbied the Greek Authorities and the European Commission (EC) for effective protection of the nesting beaches in Laganas Bay, Zakynthos, which led to the adoption of the Presidential Decree, providing constitution for the Zakynthos National Marine Park (ZNMP). A brief summary of the case history since 1994 is presented in the timeline below:

1994	MEDASSET made a formal complaint to the European Union; case No. 4/4667SG(94)A/15702 against the Greek Government for its failure to apply National and International Law and Bern Convention Recommendations, concerning the preservation of sea turtles on Zakynthos. In particular the Council Directive 92/43/EEC 21st May 1992, on the Conservation of European Wildlife & Natural Habitats of which the European Community is a party. The complaint was renewed each year until 1998.
1997	The complaint to the EC was put in abeyance. MEDASSET appealed to the EC Ombudsman.
1998	Eventually the annual complaints to the EC proved effective, leading to an “on the spot appraisal” by the EC Directorate-General (DG) XI, whose representative at the 18th Bern Meeting in 1998 announced the commencement of infringement procedures against Greece.
1999	- The Zakynthos Case File was closed at the 22nd Bern Convention Meeting in 1999 subsequent to the EC initiative to take the Greek Government to the European Court of Justice for non-implementation of conservation legislation and EC Environmental Directives in Laganas Bay. - The Presidential Decree providing the constitution for the Zakynthos National Marine Park (ZNMP) in Laganas Bay was signed immediately after the EC announced its action, in December 1999, during the Bern Convention Meeting.
2002	- The EC lodged the Case at the European Court of Justice Ruling against Greece for failing the fulfil obligations under Article 12(1)(b) and (d) of Habitat’s Directive (92/43/EEC). - Final written warning after on-the-spot appraisal showed Greece’s progress unsatisfactory.
2003	- EC Delegation consisting of all Greek nationals conducted an ‘on-the-spot’ appraisal of Laganas Bay finding ‘substantial progress has been made towards effective implementation of a system of strict protection for the sea turtles’. The findings were in contradiction to the NGO Reports to the EC. - A European Parliament Petition Committee visited Laganas Bay, highlighting in their report (10.12.03) to the Commission that “It was clear from our visit, conversations and pictures seen, that the provisions of the EC Directive are not being complied with...” - Greek Authorities issued a “short-term timetable for the adoption of the remaining actions” in order to comply with the Court Judgement of 30th January 2002.
2004	- Ombudsman denied NGO full access to the results of 2003 on-the-spot appraisal. - The EC sent Greece a Final Written Warning 'Reasoned Opinion' urging the Government to comply within 2 months - Greece responded to the EC’s ‘Reasoned Opinion’ by providing €90,000 towards the €300,000 debts of the non-functioning ZNMP Body - On December 31st 2004 the Waste Disposal Area on the hill above Sekania nesting beach, once again overflowed and the beaches and Bay were awash with effluent. The Plant has been the subject of Public Health Department prosecutions since 2000.
2005	- General Inspectors of Public Administration (GEDD) investigated Zakynthos in respects to compliance with ECJ ruling. Report gave strict recommendations to meet Ruling obligations. - Director of the Land Registry of Zakynthos was hospitalised after having been violently assaulted following signing of official documents confirming the State owned the majority of land around the nesting beaches. - NGOs MEDASSET and EuroNature delivered a 17,000 signature petition to the Greek Prime Minister. No response was issued. - The Minister of Environment appointed a replacement for the ZNMP President. A month later the NGOs lobbied against the appointment due to vested interests with his family owning illegal buildings on Dafni nesting beach.

	• New appointment of Prof. Amalia Karagounis-Kyrtsos of Athens University (current President) by Minister of Environment. • Local Zakynthos Prefect refused to demolish illegal buildings despite Government order eleven years beforehand to do so. • Dafni landowners lost an appeal at the Greek Constitutional Court to remove restrictions (imposed by the Presidential Decree constituting the Park) on private property development within the boundaries of the Park. • On 28th September 2005, a Management Body for the ZNMP was established according to the regulations outlined in the Park's Management Plan.
2006	• ZNMP President without the knowledge or consent of the Management Body developed a 'Pilot Management Plan of Dafni' and signed a 'Cooperative Agreement' with the owners of the local illegal building owners in Dafni. It indicated the locals should implement '...aesthetic and other improvements as indicated by the ZNMP' to their buildings. • A 'Pilot Management Plan of Dafni' was undertaken closing the beach and allowing the construction of 9 new buildings on the area directly behind the nesting beach. • NGOs filed formal complaint leading to Police visits and an arrest. • NGOs lobbied the EC for intervention on the continued construction. Multiple Press Releases were circulated. • Zakynthos Department of Urban Planning imposed fines ranging from €270 to €670,000 on those landowners that had further developed under the instructions of the ZNMP President (those that refused to co-operate with ZNMP President were not fined). • Local Dafni residents held protests destroying ZNMP guard posts and signage. • ZNMP President meets with EC DG Environment. Reports to media after she has successfully convinced the EC to close the ECJ Case and avoid fine.
2007	• EC DG Environment sent the NGOs a letter on their intention to close the ECJ Case. ECJ case closed on 27/6/2007. • Minister of Environment confirmed that the fines imposed on the local buildings in 2006 would not be removed. • ZNMP President instigates the construction of 2 new car parks (100 cars each) in Dafni, further facilitating access. No regulation of number of tourists on the beach. No EIA on the carrying capacity of the nesting beaches. • Mayor of the city of Zakynthos imprisoned for embezzlement of €10 million. • Improvement seen in the Management of the ZNMP; however the situation in Dafni remains largely the same.
2008	• Fines imposed 30 months ago by the Zakynthos Department of Urban Planning on illegal building owners have yet to be settled. • Discussions regarding the amendment of the existing Presidential Decree have been extensive. The President of the Park is making efforts to prevent changes to the Presidential Decree by promoting first a management plan for the area. • Although an official decision on the expansion or the relocation of the existing Waste Disposal Site (XYTA) has not been issued, it is anticipated that the expansion will not be approved since the Ministry of the Environment has made it clear in writing that such a development at Skopos is not a sustainable solution to the Zakynthos waste management problem. The ZNMP, the Hellenic Ministry of Environment and the NGOs agree that there can not be a XYTA at Skopos. Local authorities however strongly support such a development. • The representative of WWF in Zakynthos and sole representative of the NGOs on the Management Board of the ZNMP (WWF and ARCHELON are represented in rotation), submitted her resignation from Secretary General to the Board, claiming non-transparency of decision-making procedures.
2009	• The Zakynthos Municipal Council asked the ZNMP Agency to stop all activities related to the preparation of the 5-year Management Plan and to proceed with a new Special Environmental Study (SES) that would allow for a series of amendments to the Presidential Decree, favourable to local residents' property rights. • NGOs filed a joint letter of complaint to the Minister of Environment concerning the Waste Disposal Site operating within the ZNMP, demanding its immediate sealing and relocation outside the boundaries of the Park. • EC DG Environment Delegation visited Laganas Bay in June 2009 and inspected the Waste Disposal Site and Dafni nesting beach. • MEDASSET wrote to the ZNMP regarding the sound pollution generated by the illegally operating "Cameo" night club at Agios Sostis, affecting the entire Bay.

	- On May 29th the European Court of Human Rights ruled there had been a violation of Article 1 of Protocol No. 1 (protection of property) and that 2 million Euros be paid by the Greek State as compensation to the lawful owner of Marathonisi islet (part of the ZNMP). - Fines imposed in 2006 by the Zakynthos Department of Urban Planning on Dafni residents for engaging in illegal building activities remain unpaid. - The Zakynthos Municipal Council, in an extraordinary Meeting, unanimously asked the President of the ZNMP to resign. - Fires, declared by the Fire Brigade as the result of coordinated arson, destroyed 250,000 sq. meters of Mediterranean maquis vegetation surrounding Dafni nesting beach.
2010 – 2018	MEDASSETs continues to update the Bureau with information in relation to Recommendation No 9
2019	- MEDASSET conducts an assessment on the implementation of Recommendation No. 9 (1987) and the ZNMP conservation measures. The report with supporting information from ARCHELON and WWF Hellas is submitted to the Bureau, urging them to table the issues at Zakynthos for discussion at the 2019 Standing Committee meeting. - Concerns for the continuous issues, the Standing Committee decide to consider this closed file as a possible file, to discuss at the next Bureau meeting.
2020	- MEDASSET with supporting information provided by ARCHELON and WWF Hellas submit a report with the findings of a site assessment to the Bureau, urging the file to be re-opened. - The 40th Standing Committee vote to re-open the case; 13 parties voted in favour, 2 against and 8 abstained. The File is re-opened. The authorities were against the re-opening of the file.
2021-2025	- MEDASSETs continues to update the Bureau with information in relation to Recommendation No 9 by conducting assessments and submitting reports. - In 2022, a fine of 200.000 Euros that was imposed to a landowner for the illegal construction of a road between Daphni and Gerakas, was reduced to 10.000 Euros. In 2023, by a court decision the fine was erased, but this has been legally challenged by MEDASSET and WWF Hellas. On 9 July 2024, the criminal court of Zakynthos convicted the landowner to 14 months in prison without any extenuating circumstances for his criminal actions leading to the degradation of the protected area. - New constructions and illegal landscaping started in Marathonisi in February 2025, but are currently on hold since March 2025 due to the efforts of the NGOs.

ANNEX: REFERENCES

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- T-PVS (99) 70: MEDASSET: Specific Site, *Caretta caretta* in Zakynthos (Laganas Bay, Greece), pp. 2-14. (Update report and recommendations).
- T-PVS (98) 48: MEDASSET: Specific Sites, Marine Turtle Conservation in Zakynthos Laganas Bay, Greece, 10 pages. (Update report and recommendations).
- T-PVS (97) 46: L. Venizelos, MEDASSET Marine Turtle Conservation in Zakynthos (Laganas Bay), Greece, 5 pages. (Follow-up report and recommendations).
- T-PVS (96) 86: MEDASSET (L.Venizelos): *Caretta caretta* in Laganas Bay, Zakynthos (Greece), 5 pages. (Follow-up report and recommendations).
- T-PVS (95) 63: MEDASSET (L.Venizelos): Specific Sites, *Caretta caretta*, in Laganas Bay, Zakynthos (Greece), 3 pages. (Follow-up report and recommendations).
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- T-PVS(92)83: MEDASSET activities 1991-1992. Declaration of MEDASSET on item 12.1 about Zakynthos. pp16-18
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ANNEX: MAPS & PHOTOGRAPHS

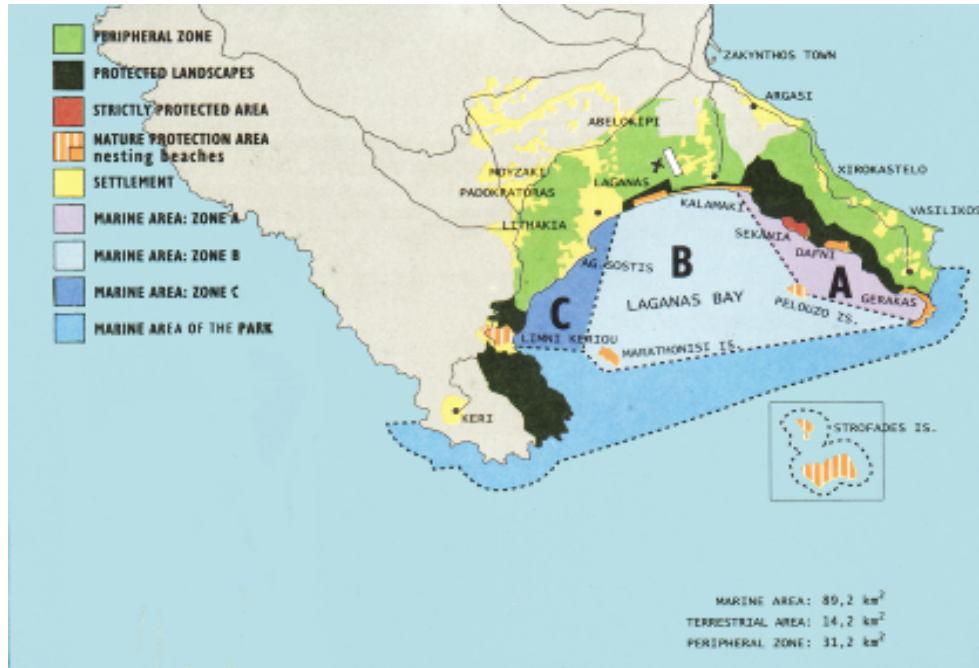


Fig. 1 | Zakynthos National Marine Park Map

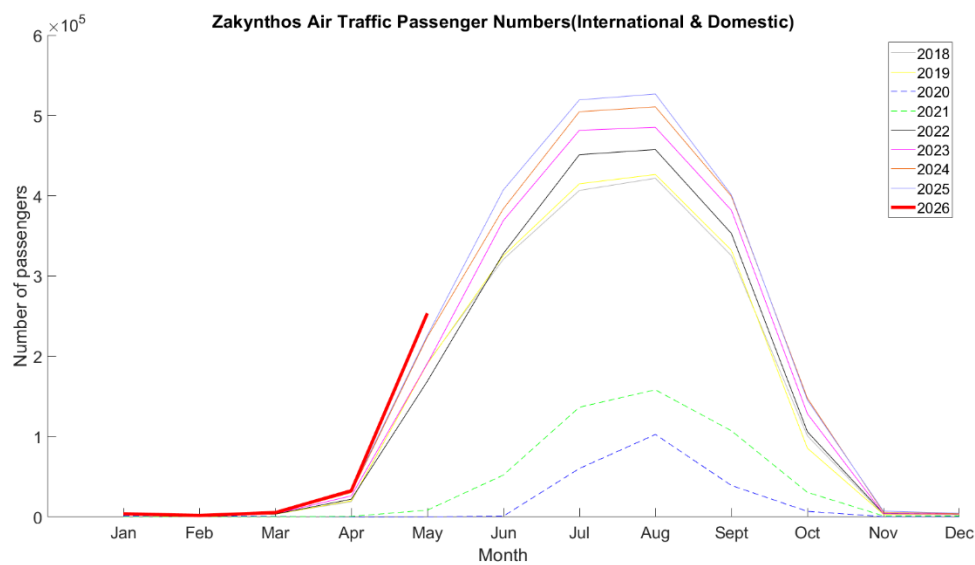


Fig. 2 | Data on air traffic passenger numbers to Zakynthos, 2018 – 2025 and Jan – May 2026. Dashed lines represent years affected by COVID pandemic. Data downloaded from the Hellenic Civil Aviation Authority for Zakynthos Airport. [Hellenic Civil Aviation Authority - Our Airports - Zakynthos Airport "D.Solomos" \(ypa.gr\)](https://ypa.gr)



Fig. 3 | Dafni, 30 June 2025: Natural sand dune system destroyed. The situation remains unchanged. All the buildings seen in this figure are illegal.

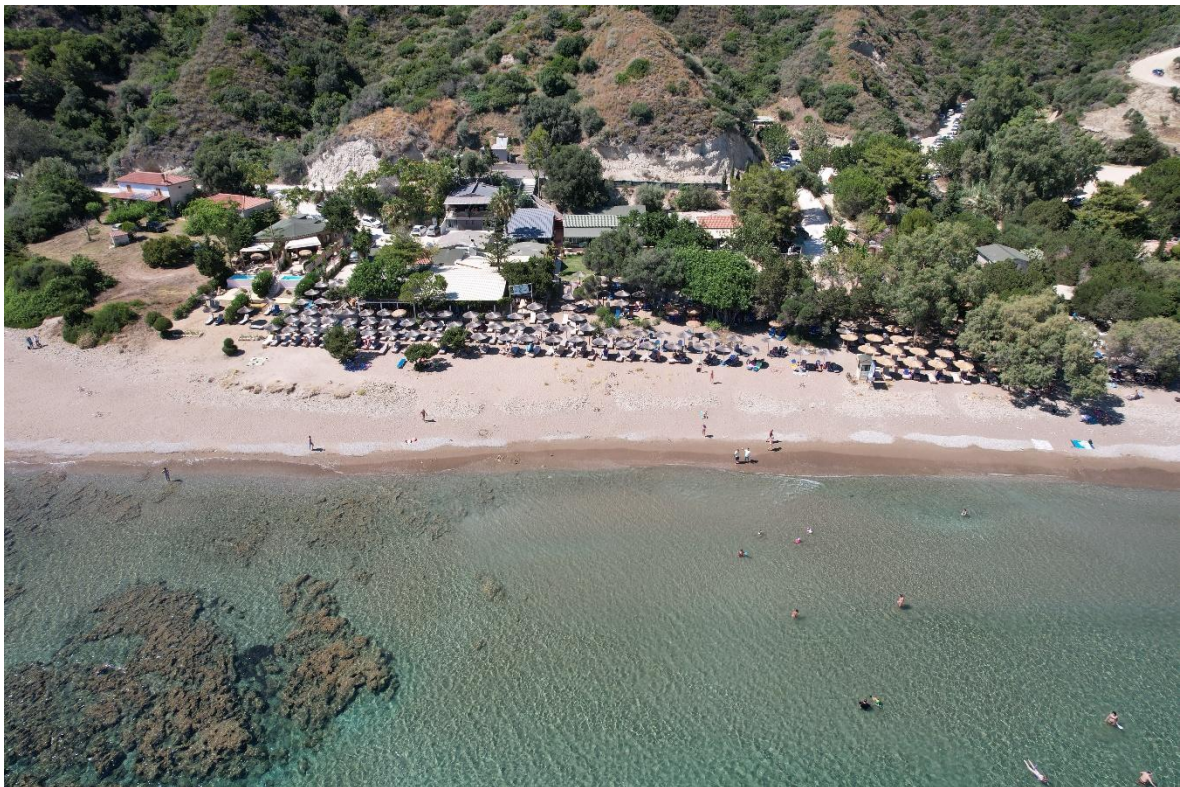


Fig. 4 | Dafni, 30 June 2025. The situation remains unchanged. Sunbeds and umbrellas cover the natural sand dune system, now destroyed.



Fig. 5 | Dafni 30 June 2026 (17:00-17:30). Sunbeds and umbrellas cover the destroyed sand dune system at the back of the nesting beach, where non-indigenous plants have been introduced and maintained (orange

circle). Due to erosion (yellow circle), non-indigenous vegetation, and illegal structures; available area for sea turtle nesting on the beach of Dafni is significantly reduced (red circle), as can be seen and highlighted in the images and circled sections.



Fig. 6 | Dafni 30 June 2026. No warden was present in the guardhouse or anywhere at the beach of Dafni at 17:00, when 360 visitors were present, exceeding the maximum number of 100 people allowed. A sign next to the guardhouse contains information regarding the nesting beach for tourists.





Fig. 7 | Dafni 30 June 2026. No protective management measures (ropes, zoning) present on beach to ensure safe distances between visitors and nests are maintained (green circles and arrows). Red circle shows presence of fire between nests.

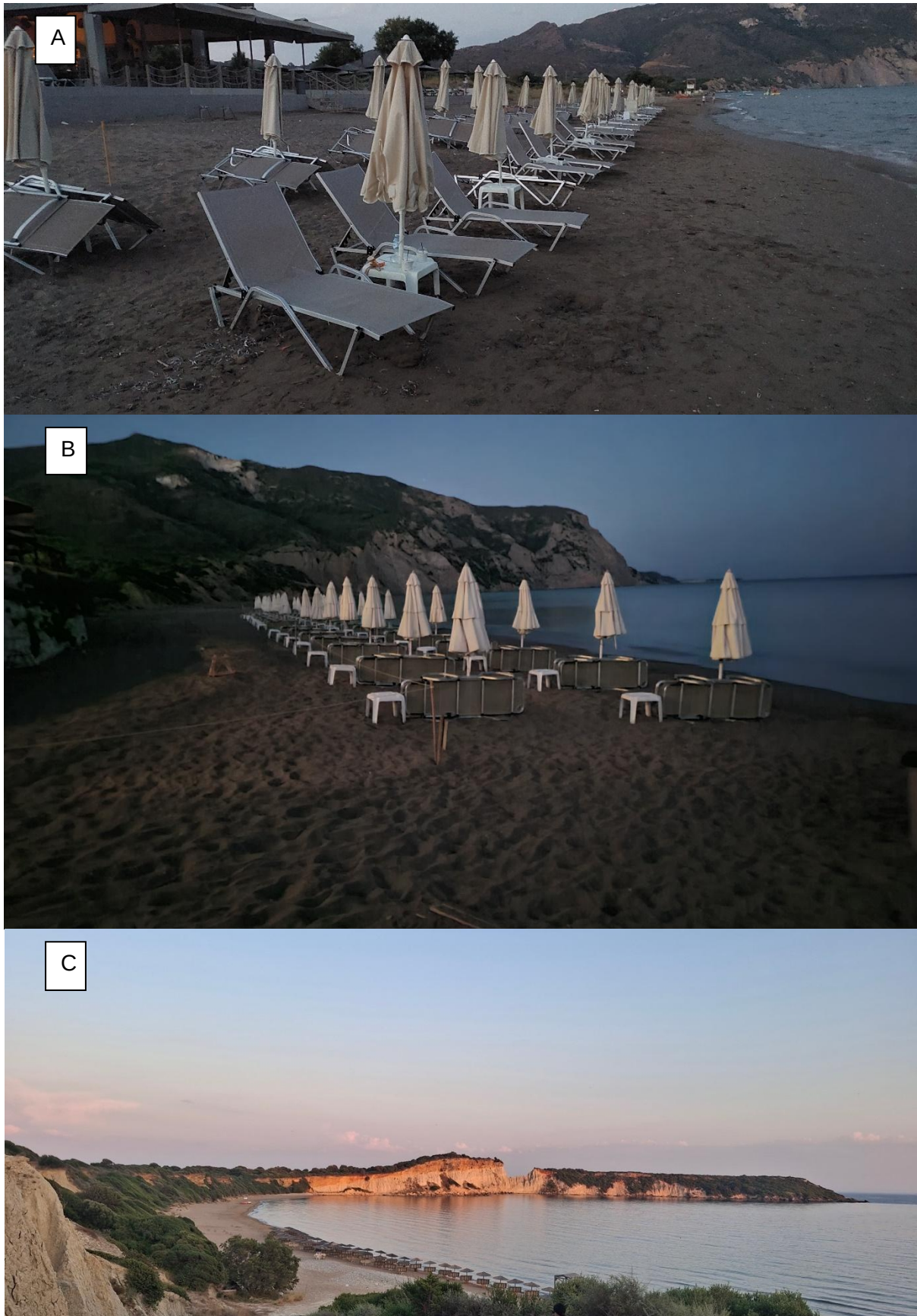


Fig. 8 | Laganas East, Zante Beach (A), Kalamaki (B) and Gerakas (C) 30 June 2026. Sunbeds were placed on their side in situ at night, nevertheless, as the umbrella posts are close, they still interfere with sea turtle nesting by creating barriers and reducing available space for emerging nesting females.



Fig. 9 | Marathonisi 30th June 2026. In total 6 boats counted anchored to the nesting beach, which is within the maximum allowed at any one time (10).



Fig. 10 | Marathonisi construction area. The construction area in Marathonisi island seems unchanged since the temporary stop work order was issued in 2025.



Fig. 11 | Gerakas, 30th June 2026 21:37. No warden presence after the beach closure hours at Gerakas. Groups of people deliberately cross restricted area to go to Greakas beach in search of sea turtles (circled in red), despite ropes, gate and signs stating clearly that the area is restricted after sunset.



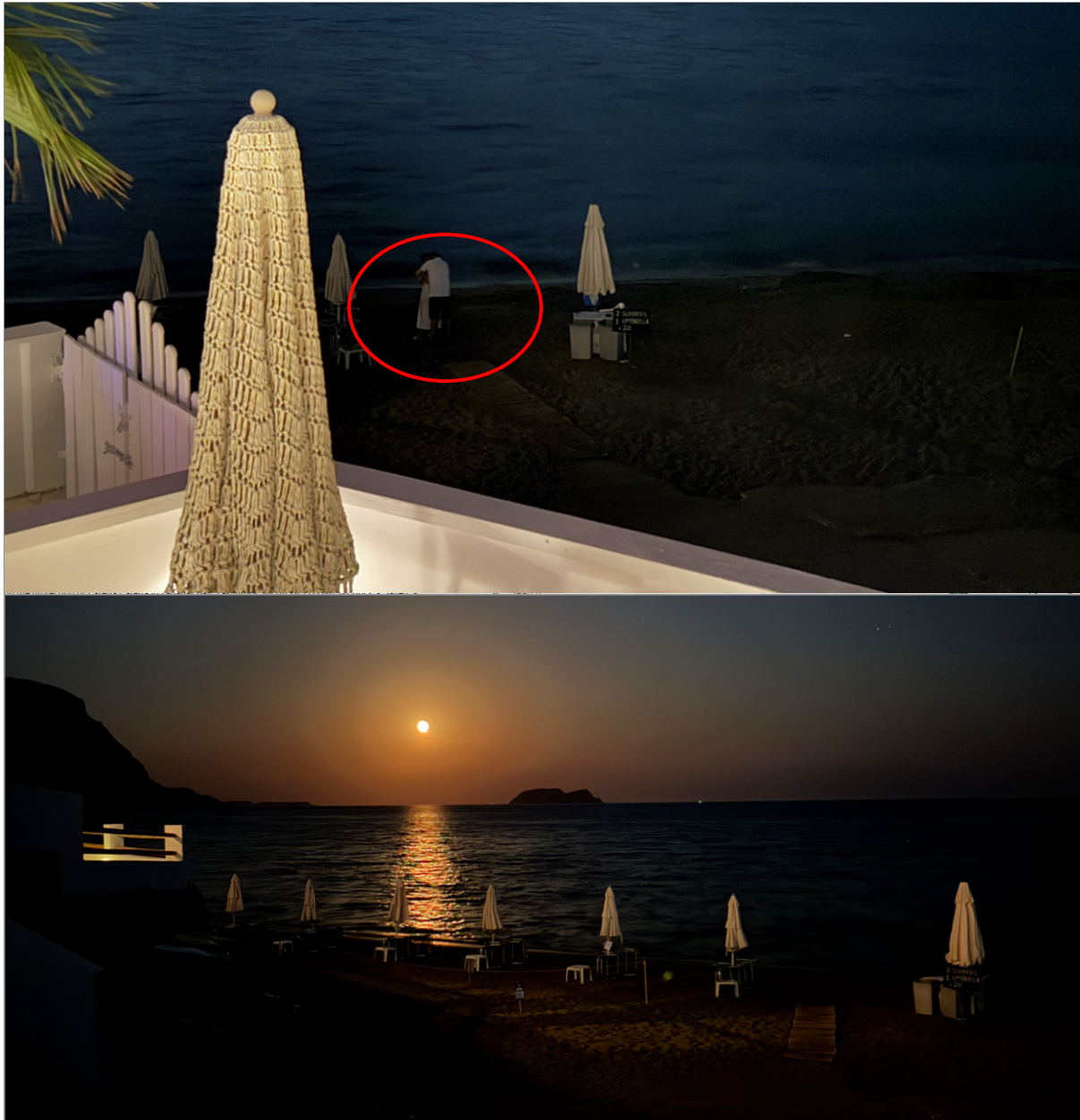


Fig. 12 | Kalamaki beach 30th June 2026. Tourists walking on the nesting beach at **23:10** after its closure (red circle) and umbrellas with beach beds collected and stored on the side also depicted.



Fig. 13 | Marathonisi 30th June 2026 13:00. No warden present nor a guardhouse at the beach of Marathonisi when 140 visitors were present.





Fig. 14 | Laganas East 30th June 2026. Sand sculptures and castles were not flattened, consisting an obstacle to sea turtle hatchlings when crawling to the sea.





Fig. 15 | Gerakas 30th June 2026. Two wardens were present at the beach of Gerakas at 17:15. The whole nesting area was cordoned off and nests were indicated and protected by cages and signage. 274 visitors were present at the time, not exceeding the maximum number of 350 people allowed; and they were all removed by the wardens from the beach at sundown. 50 umbrellas for rent and 112 sunbeds that have been officially endorsed by the N.M.P.Z.; 26 private umbrellas were counted.

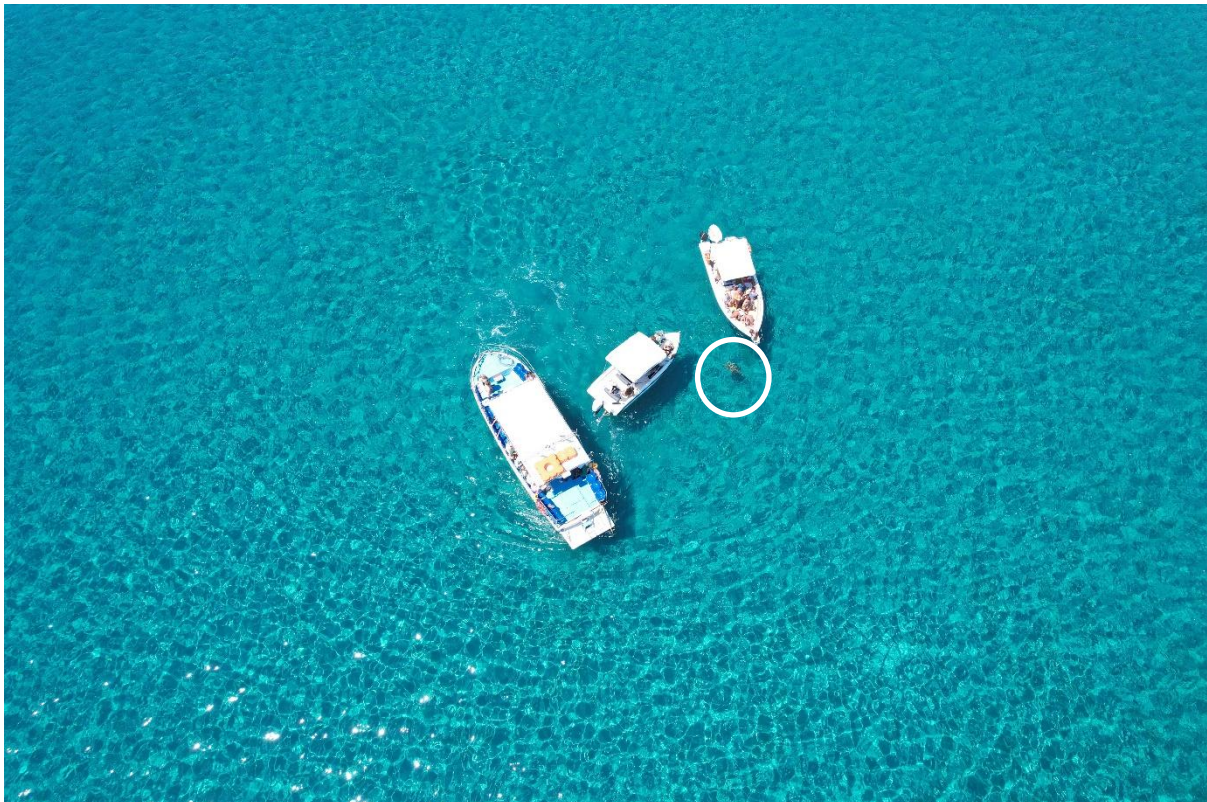


Fig. 16 | Agios Sostis 30th June 2026. Non-compliance to the turtle spotting regulations resulting in turtles being harassed in the Bay. A sea turtle near the boats is shown in white circle.



Fig. 17 | Marathonisi 30th June 2026. Speed boats within the ZNMP area clearly speeding over the 6 knot limit.



Fig. 18 | Laganas East June 2025. Male loggerhead photographed in June 2025 with extensive recent propeller injuries

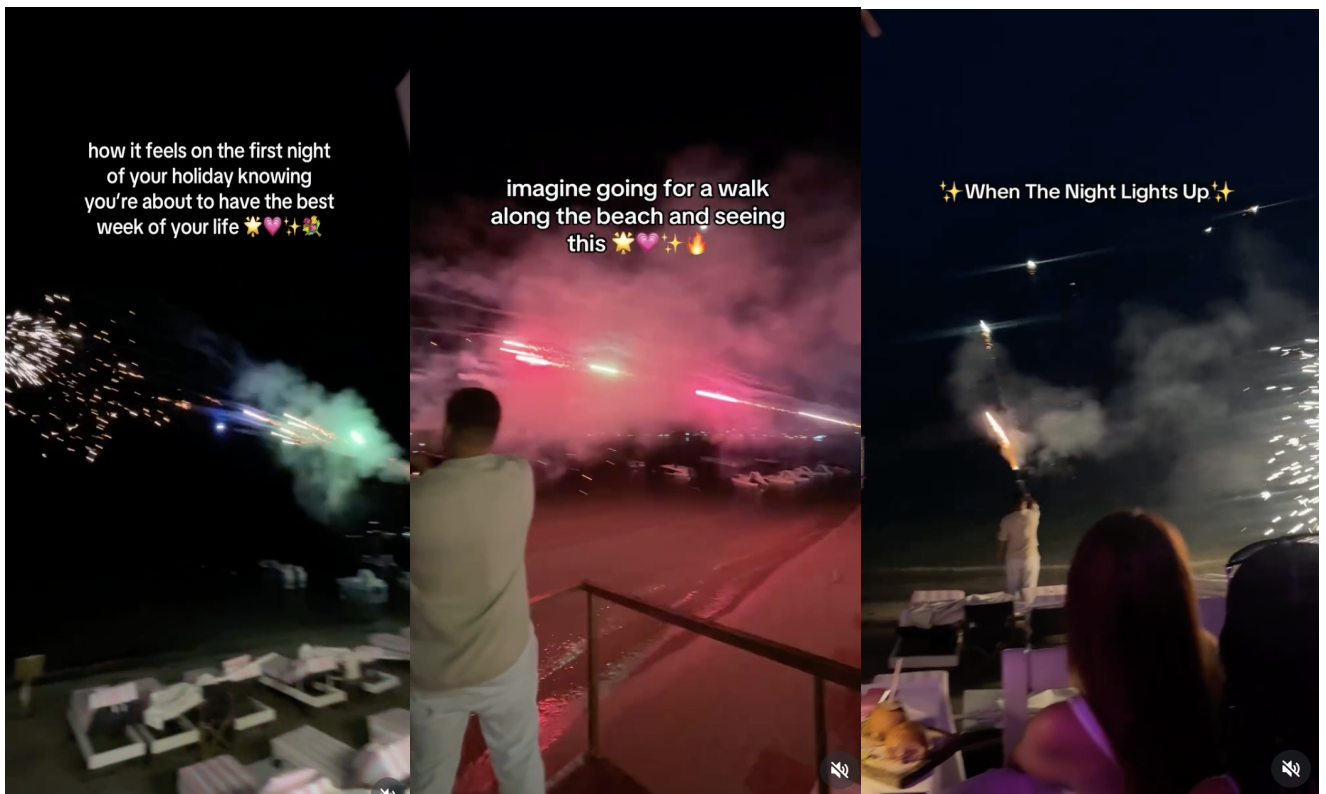


Fig. 19 | Snapshots collected from Instagram videos (@isabelszakynthos Instagram account) depicting fireworks being shot right into the sea on Zante Beach on Jun 22, 26 and July 7, 2026.

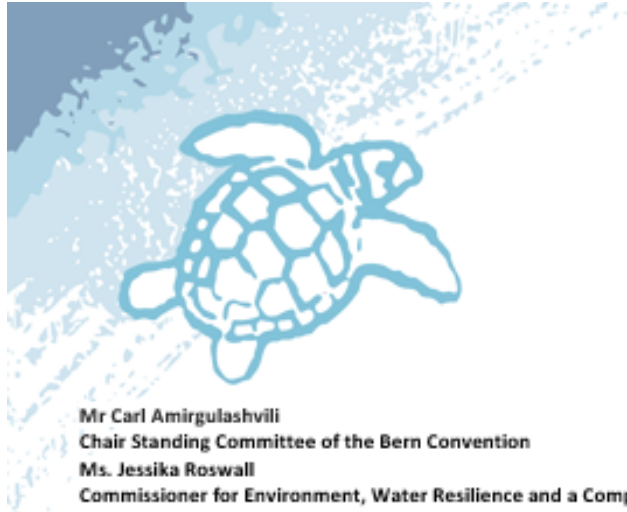






Fig. 20 | Kalamaki 30th June 19.30 behind the guard house at the old zante beach, cars, and horses, marks of the cars. Images depict evidence of damage to the sand dunes.

Update Report February 2026



MEDASSET
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Mr Carl Amirgulashvili
Chair Standing Committee of the Bern Convention
Ms. Jessika Roswall
Commissioner for Environment, Water Resilience and a Competitive Circular Economy

10 February 2026

Our Ref. 5.2026

Re: Update in relation to Open File 1986/08: Greece: Recommendation No. 9 (1987) on the protection of *Caretta caretta* in Laganas Bay, Zakynthos

Dear Mr. Carl Amirgulashvili,
Dear Ms. Jessika Roswall,

MEDASSET, in collaboration with ARCHELON and WWF Greece, hereby submits an update regarding **Open File 1986/08** and the implementation of **Recommendation No. 9 (1987)** concerning the protection of *Caretta caretta* in Laganas Bay, Zakynthos. We request that this matter be tabled for discussion at the upcoming Spring 2026 Bureau meeting.

I. Lack of Progress on Recommendation No. 9 (1987)

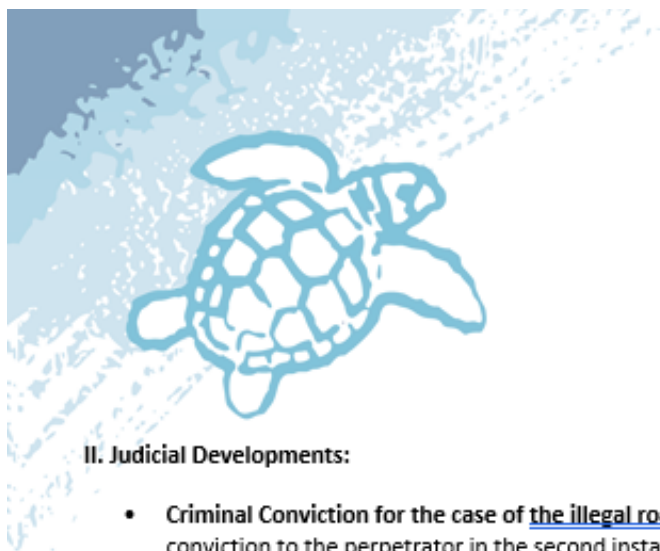
In reference to the violations that MEDASSET presented in the framework of the 45th Standing Committee and the Rec. No 9 (1987), no progress for their resolution has been witnessed.

Below for your reference is a list of the unresolved points as presented during the 45th Standing Committee Meeting:

- 1. Unregulated Maritime Activity:** The proliferation of boat licenses has led to a surge in rental vessels, many of which engage in unregulated and harmful "turtle spotting" activities within the protected zone.
- 2. Beach Overcrowding and Furniture Violations:** Persistent non-compliance with the maximum furniture limits set by Presidential Decree continues to stress nesting habitats. Notably, at Gerakas Beach in 2025, 167 sunbeds were documented, a significant violation of the 120-unit legal limit.
- 3. Unauthorized Nocturnal Beach Access:** There are continued documented instances of human presence on nesting beaches at night, disturbing the natural nesting and hatching processes.
- 4. Inadequate Nest Protection Infrastructure:** The application of protective roping to prevent human trampling of nests remains delayed and inconsistent, leaving high-density nesting areas vulnerable.
- 5. Persistent Light Pollution:** Documented incidents of nocturnal light pollution continue to disorient nesting females and hatchlings, undermining the ecological integrity of the site.
- 6. Systemic Enforcement Gaps:** The legislative framework and associated management measures are not being effectively enforced across the entirety of the National Marine Park of Zakynthos (NMPZ).
- 7. Non-Compliance with Judicial Orders:** Illegal developments persist despite standing court orders for demolition and environmental restoration, particularly regarding the illegal road construction between Gerakas and Dafni.
- 8. Critical Developments on Marathonisi Island:** The island remains a focal point of concern due to ongoing illegal interventions and the complexities of current criminal and administrative legal proceedings.

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Non Profit Organisation. Established by the 3187/93 Decision of the Athens' Court of First Instance
Member: MIG/ECODE & Greek Herpetological Society. Partner to UNEP/IMP - Permanent Observer-member of the Bern Convention.



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II. Judicial Developments:

- **Criminal Conviction for the case of the illegal road:** The Court of Appeals of Patras has issued a criminal conviction to the perpetrator in the second instance, for the illegal road interventions carried out in 2018. The court imposed a sentence of **12 months imprisonment without mitigating circumstances**. This is a victory for the civil parties MEDASSET and WWF Greece who supported the ministry of Energy and Environment (NECCA/OFYPEKA) in this legal case. Furthermore, the Single-Member Administrative Court of Zakynthos will hear an administrative appeal by WWF Greece and MEDASSET against the annulment of previously imposed fines for the illegal road construction, in May 2026.
- **Administrative Rulings for the case of Marathonisi island:** The Administrative Court of Appeal of Patras recently **rejected** the request by ZANTE MARATHONISI S.A. to suspend the "stop-work" order on their building permit. The Municipality of Zakynthos challenged the status of the "ruins" that the company sought to rebuild, noting that such reconstruction would violate existing construction restrictions imposed by the Presidential Decree. In addition, the Urban Planning Department of the Zakynthos Municipality refused to allow any construction without the consent of NECCA/OFYPEKA and a complete study detailing and quantifying the proposed interventions.

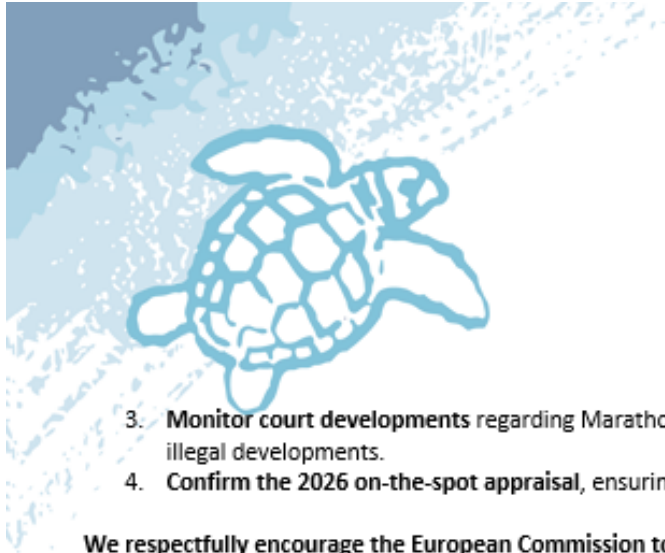
III. Systemic Threats: Hydrocarbons and Special Environmental Studies (SES) Laganas bay also faces broader systemic issues, which threaten the integrity of this protected area:

- **Hydrocarbons:** the Greek Government signed contracts for hydrocarbon exploration and extraction in adjacent marine protected areas, which constitutes a significant new environmental threat.
- **SES Deficiencies:** Although the Greek Government has initiated legal procedures to declare two new national marine parks in the Ionian and Aegean Seas, with the Special Environmental Studies (SES) adopted on 30 December 2025, critical management issues remain unresolved. Despite our participation in the September consultation process, we remain concerned that the mapping and zoning for the Ionian National Marine Park do not provide consistent protection for *Caretta caretta* nesting beaches. The terrestrial areas are currently fragmented, and with several Environmental Impact Assessments (EIAs 5a and 5b) remaining unpublished, overlapping mandates create a high risk of conflicting zoning and permitted uses. Furthermore, key regions such as Laganas Bay lack clear administrative arrangements, leading to significant uncertainty regarding management responsibilities. Urgent action is required to establish unified mapping and institutional clarity to ensure coherent protection and prevent contradictory conservation measures. We will continue to monitor this process closely, advocating for a robust framework that leads to the successful official establishment of these parks.

IV. Recommendations and Call to Action

We respectfully encourage the Bern Convention Standing Committee to:

1. **Table this matter for discussion** at the 1st Bureau meeting of 2026.
2. **Maintain strict follow-up** on Recommendation No. 9, particularly Measure No. 1 regarding Dafni and the implementation of the National Action Plan (adopted 2021).



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3. **Monitor court developments** regarding Marathonisi Island and pressure authorities to permanently end illegal developments.
4. **Confirm the 2026 on-the-spot appraisal**, ensuring it addresses the failures noted in the 2025 appraisal.

We respectfully encourage the European Commission to:

1. **Participate in the on-the-spot appraisal** in Laganas Bay.
2. **Urge Greek authorities** to fully conform with national and EU legislation.
3. **Collaborate closely** with the Bern Convention to ensure a unified approach to these persistent violations.

We remain at your disposal for any further information.

Yours sincerely,

Lily Venizelos

MEDASSET President

Member of IUCN-Species Survival Commission: Marine Turtle Specialist Group

CC:

Bern Convention, Council of Europe:

Ms. Alessandra SIINO, Secretary of the Bern Convention

Mr. Marc HORY, Project Manager - European Diploma for Protected Areas and Emerald Network

Ms. Marta MEDLINSKA, Programme Manager

European Commission, Directorate-General for Environment:

Mr. Eric MAMER, Director for Biodiversity, DG Environment, European Commission

Ms. Telma BRANCO WUNSCH, Policy Officer 'Nature Conservation' DG Environment, European Commission

Mr. Yannis COUNINIOTIS, Env. E.3 — Implementation and Support to Member States, DG Environment, European Commission

Ms. Anna CHEILARI, Env. D.3 Natural Capital — Nature Protection, DG Environment, European Commission

Ms. Florika FINK HOOIJER, Director-General for Environment

Mr. Andrea VETTORI, Head of Unit Nature Conservation