



Strasbourg, 19 February 2026



TPVS/Files(2026)1986-8_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

46th meeting
Strasbourg, 7-11 December
2026

Bureau of the Standing Committee

7-9 April 2026

Strasbourg

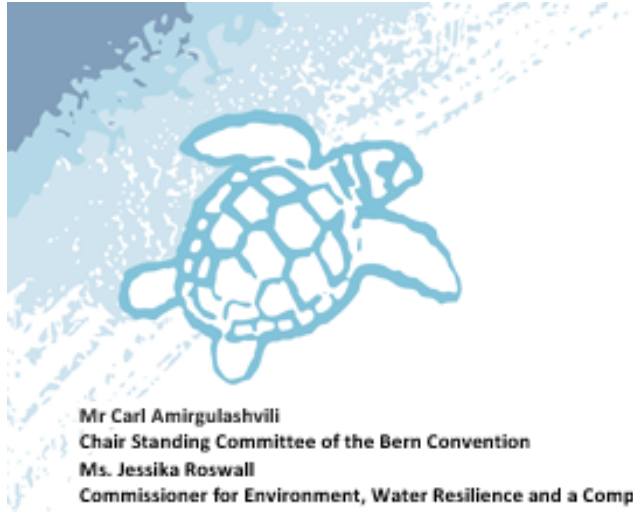
Open file: 1986/8

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

- REPORT BY THE COMPLAINANT -

Document prepared by MEDASSET

Update Report February 2026



MEDASSET

Mediterranean Association
to Save the Sea Turtles

Licavilou 1C, Athens, Greece 106 72
Tel./Fax: +30 210 361 3572, 210 364 0389
E-mail: medasset@medasset.org
www.medasset.org
www.euroturtle.org

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)

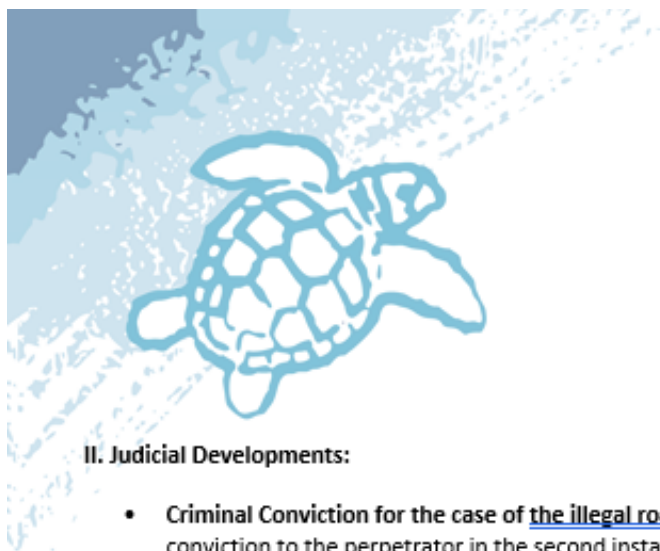
In reference to the violations that MEDASSET presented in the framework of the 45th Standing Committee and the Rec. No 9 (1987), no progress for their resolution has been witnessed.

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.

Protecting marine biodiversity in the Mediterranean since 1988

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.



MEDASSET Mediterranean Association to Save the Sea Turtles

Licavittou 1C, Athens, Greece 106 72
Tel./Fax: +30 210 361 3572, 210 364 0389
E-mail: medasset@medasset.org
www.medasset.org
www.euroturtle.org

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.

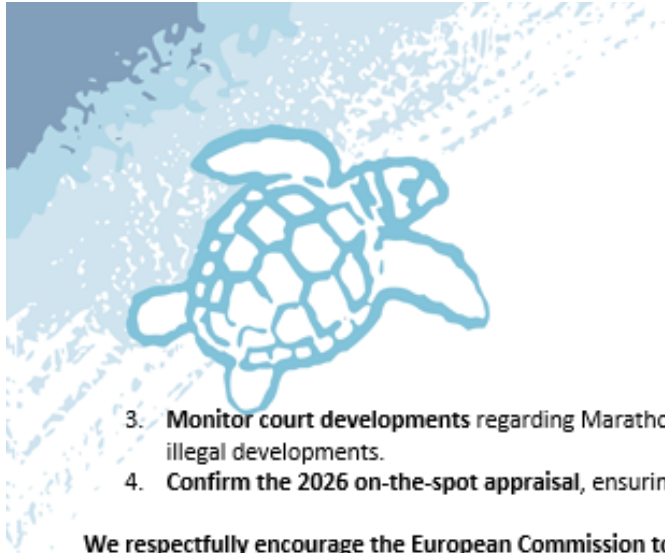
III. Systemic Threats: Hydrocarbons and Special Environmental Studies (SES) Laganas bay also faces broader systemic issues, which threaten the integrity of this protected area:

- **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).



MEDASSET

Mediterranean Association
to Save the Sea Turtles

Licavitou 1C, Athens, Greece 106 72
Tel./Fax: +30 210 361 3572, 210 364 0389
E-mail: medasset@medasset.org
www.medasset.org
www.euroturtle.org

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