



Strasbourg, 31 July 2025

TPVS/Files(2025)1986-8\_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE AND  
NATURAL HABITATS

---

**Standing Committee**

45<sup>th</sup> meeting

Strasbourg, 8-12 December 2025

---

**Bureau of the Standing Committee**

16-18 September 2025

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 BY THE NGO

### Marine Turtle Conservation in the Mediterranean

## LOGGERHEAD SEA TURTLE (*CARETTA CARETTA*) CONSERVATION MONITORING IN ZAKYNTHOS (LAGANAS BAY), GREECE

31 July 2025

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

*for the 45<sup>th</sup> 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 3<sup>rd</sup> Bureau Meeting of the Bern Convention (16-18 September 2025) 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](http://www.aga-artenschutz.de).

#### **Contents:**

- SUMMARY
- DETAILED UPDATE
- ANNEXES:
  - ANNEX: BACKGROUND
  - ANNEX: REFERENCES
  - ANNEX: MAPS & PHOTOGRAPHS

Production and dissemination in full or in part of this publication for non-commercial purposes are authorised without any prior written permission provided the source is fully acknowledged and cited.

#### **SUMMARY**

Our summer 2025 assessment incorporates findings we observed during the Bern Convention OSA (BCOSA), which took place on June 17 – 20, 2025, and ten days later, June 30 – July 1. At this juncture we would like to report that MEDASSET, ARCHELON and WWF Greece were not consulted during the organization of the BCOSA, provided no input on the agenda or any other matter related, and had to arrange its own means to visit all BCOSA locations on the island.

During the BCOSA, we observed improvements on the management measure for some of the six protected nesting beaches, such as increased cordoning of the nesting areas at the back of all the beaches, more and new signs, and warden presence. However, the warden presence after the BCOSA was completed was not consistent, especially at nighttime 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. In many instances, we observed that the absence of wardens after sunset resulted in people visiting the nesting beaches after the beach closure hours. Particularly in the area of Kalamaki beach, we frequently observed tourists walking on the nesting beach after the beach's closure, and on social media we found a video of tourists harassing a sea turtle on the beach, while trying to nest.

In the maritime area, before and after the BCOSA period, we observed rampant violation of the rules and regulations controlling marine traffic and sea turtle spotting by tourists. The conditions were significantly worse since last year's report. Marine traffic remains extremely high, and we observed an alarming number of boats dangerously approaching the sea turtles for touristic purposes. More specifically, we observed and recorded on video a speedboat moving with high velocity over a sea turtle, near the Ag. Sostis port. We also report the excessive use of fireworks and strobing lights from local

nightclubs in the wider area of East Laganas that are capable of illuminating the entire nesting area and interfering with their nesting efforts.

Illegal developments in the ZNMP remain, even though the courts have ordered their demolition and the restoration of the area between Gerakas and Dafni. 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 as we have already reported to you.

Regulations and management measures that apply within the ZNMP are either not enforced or are not enforced consistently and effectively. As it was observed during the BCOSA and we have reported previously, there is a severe lack of coordination between the authorities responsible for the protection and enforcement of laws and regulations.

Thirty-eight years since Recommendation No. 9 (1987) was adopted by the Bern Convention Standing Committee and twenty-three years since Greece was condemned by the European Court of Justice, 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 Body of the National Marine Park of Zakynthos one of Natural Environment and Climate Change Agency units (NECCA), in particular for warden resources for adequate marine and terrestrial protection of the nesting beaches and maritime area on a 24/7 basis.
- 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. Especially for the forested section of the protected area threatened by potential [fires](#), it is crucial to create a prevention and suppression plan and implement access control measures.

***MEDASSET calls upon the Bern Convention Standing Committee to:***

- Discuss the case file at the 45<sup>th</sup> 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.
- Closely monitor the developments of the ongoing court cases and the relevant actions of the competent authorities
- Follow up on the illegal developments in Marathonisi island and pressure for their permanent ending.

**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.

MEDASSET visited the Zakynthos National Marine Park (ZNMP) in mid-June, as part of the Bern Convention OSA, as well as late June and early July 2025 to assess and document the conservation status of the protected nesting beaches as well as the maritime area, following the Bern convention organized OSA. 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-eight 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, consisting of more than 500 sunbeds, contrary to the PD / management measures that allows 100 persons in the beach and no sunbeds at all (Fig. 4), non-indigenous plant species (Fig. 5), and showers, whose water runoff flows onto the nesting beach (Fig. 6). It should be noted that there was no warden presence at the beach of Dafni at the day we monitored the area (Fig. 7).

### ***5. 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 more than 200 people present at 15:00 on 30<sup>th</sup> June 2025. No measures for maintaining safe distances of visitors from nests, such as cordoning and signage were present on Dafni. Visitors are not only free to roam everywhere and in very close proximity to the caged nests (Figs. 6, 8), 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 (250 at 16:00 30<sup>th</sup> June) did not exceed the maximum allowance of 350, but it did in Marathonisi Island (more than 250 persons at 11:30 1<sup>st</sup> July 2025) where the maximum allowance is 200 people.

Maximum Umbrellas/ Sunbeds: Across Laganas East and Kalamaki nesting beaches the regulations permit a total of 150 umbrellas and 300 sunbeds. Our surveyor counted 139 umbrellas and 282 sunbeds (Laganas East: 70 umbrellas and 144 sunbeds; Kalamaki: 69 umbrellas and 138 sunbeds), which did not exceed the specified limits. However, no sunbeds on Laganas East, Kalamaki and Gerakas were not removed from the front of the beach at night but were only placed on their sides *in situ*. (Fig. 9). 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, which was also observed during the OSA in June, with a sea turtle emerging to nest, encountering a sunbed, and abandoning her nesting attempt.

Maximum number of Boats at Marathonisi: Even though a maximum number of 10 boats are allowed at Marathonisi at any time, our surveyor counted 33 professional and private hire boats anchored on the nesting beach at 11:30 on 1<sup>st</sup> July 2025 (Fig. 10). It is important to notice that 7 floating canteens, which offer drinks, coffee and snacks, rest directly on the sandy beach of Marathonisi. Moreover, the "Shipwreck" (or "Navagio") beach, which attracted thousands of visitors outside the ZNMP, remains closed from 2023 for safety reasons. This causes extra anthropogenic pressure on other touristic locations, such as the northwest coast caves and Laganas Bay, especially Marathonisi.

### **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 (150m<sup>2</sup>) and a house (80m<sup>2</sup>) (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, has not taken place, 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.<sup>1</sup> The Greek Ministry of Environment issued a statement arguing that the delays are due to lack of progress in various processes, which are under the

<sup>1</sup>[https://ec.europa.eu/commission/presscorner/detail/en/IP\\_23\\_5444](https://ec.europa.eu/commission/presscorner/detail/en/IP_23_5444)

competence of other sectoral and regional authorities.<sup>2</sup> Despite Greece's referral to the CJEU, no concrete action has been undertaken for the restoration yet.

- 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 2017, 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 to Directive 2004/35/EC, for which the perpetrator is legally obliged to restore the whole area at his own expense. A fine of 200.000 Euros was imposed, 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 from 200.000 to 10.000 Euros.

MEDASSET and WWF Greece immediately lodged a civil law legal action in the Administrative Court of First Instance against the validity of this fine reduction and notified the Natural Environment and Climate Change Agency (NECCA) of this action. Moreover, in September 2023, the Administrative Court of Pyrgos annulled the administrative fine of 10,000 euros. In April 2024, WWF Greece and MEDASSET filed a third-party complaint to contest the decision of the Administrative Court of Pyrgos and its jurisdiction over the matter. Two trials took place on the 18<sup>th</sup> of September 2024, one at the Administrative Court of Corfu pertaining to the non-competence of the Pyrgos court and in parallel one at the Administrative Court of Pyrgos challenging the fine reduction. We are awaiting for the final ruling.

Irrespective of the civil case and on a very positive note, the criminal court of Zakynthos convicted on the 9<sup>th</sup> of July 2024, the landowner to 14 months in prison without any extenuating circumstances for his actions leading to the degradation of the protected area which were committed in 2018. It should be noted that the landowner had already been found guilty for his 2015-16 actions by an irrevocable judgment of the Greek Supreme Court (Areios Pagos).

- In February 2025, ARCHELON was notified of illegal construction works on the protected islet of Marathonisi, zone A2 of the National Marine Park of Zakynthos (ZNMP). The works that took place for several days included the arrival of a ferry boat and the unloading of a bulldozer and building materials, the construction of a platform on the protected nesting beach, the start of construction and tree clearing works, and the lighting of at least one fire (Figs 21-23). The NGOs MEDASSET, ARCHELON and WWF Greece joined forces to investigate the case, and found that the Zakynthos Municipal Building Service Office (YDOM) had issued a building permit since 2022, which violated the rules of the PD governing the ZNMP. It allowed construction of new buildings under the pretext of restoration of existing ones, in the ecologically sensitive and legally protected area of the islet of Marathonisi. The erroneous permit was issued without taking into consideration the prohibition of construction of new buildings in this specific zone, and without the approval from the Natural Environment Climate & Change Agency (NECCA) managing the area. The works on Marathonisi threatened the nesting beach with serious and immediate degradation, through the compression of the sand by heavy machinery, alteration of the geomorphological composition of the beach due to erosion from land reclamation, destruction of the sand dunes, and ultimately serious disruption of the nesting process itself. Currently, the construction has temporarily stopped, as the YDOM was forced to re-evaluate the permit, under pressure by the NGOs and NECCA, and the Ministry of Environment and Energy.

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

- At the time of our survey there were only eleven wardens employed, six worked the day shift, two were on boat duty and three worked the night shift, a number completely inadequate! 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 2025 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. 7, 12 and 11). At Gerakas beach the warden remained at the guardhouse away from the beach. At

<sup>2</sup> <https://ypen.gov.gr/anakoinosi-genikis-grammateias-syntonismou-diacheirisis-apovliton/>

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. 18). 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 (Fig. 17).

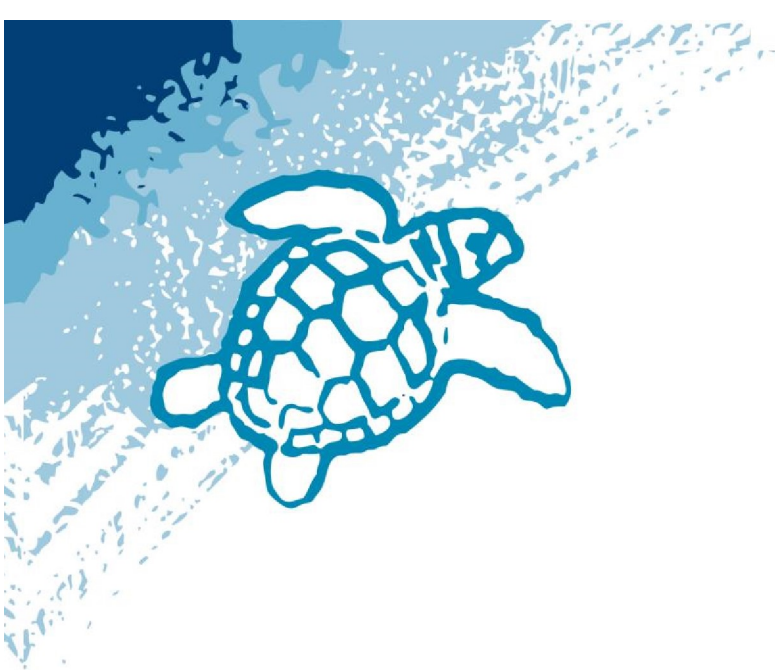
- During the day, during our July 1 visit, no warden was observed on Marathonisi (Fig. 12), and no enforcement for the management measure of maximum number of boats allowed at one time around the beach was observed (Fig. 10). It is notable that neither guard nor kiosk exist this year at the area. One warden was observed patrolling along Laganas East, actively removing any persons at the back of the beach. However, at Laganas beach, sand sculptures and sand castles were not flattened, consisting an obstacle to sea turtle hatchlings when crawling to the sea (Fig. 13).
- At 16:00, the warden was present at the guardhouse but not at the beach of Gerakas when more than 250 visitors were present (Fig. 14B). Except for the permanent furniture (64 umbrellas and 128 sunbeds), the visitors used private umbrellas (approximately 10 which is not permitted according to the PD), covering the nesting beach of Gerakas (Fig. 14A) and 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 and Laganas East.
- Horse riding on the nesting beaches and on the protected sand dunes is strictly prohibited, due to the negative impacts this activity has on the incubation of nests and destruction of the sand dune habitat. Horse riding as an ecotourism activity continues to be observed unhindered throughout the ZNMP, on the protected sand dune system at the back of Laganas East (Fig. 15), within the boundary of the park that supports turtle nesting.
- 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 within the 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. 19). Numerous boats were observed greatly exceeding the speed limit and numerous incidents of boat strikes have been recorded.
- The extensive use of fireworks and of strobe lights in West Laganas, by nightclubs, that have the capacity of illuminating the entire nesting area to Kalamaki, more than 4kms away, were documented. These new installations pose a critical threat to both adult female sea turtles attempting to nest, as well as hatchlings trying to find their way toward the sea (Fig. 20).

#### ***Observations on other activities and impacts:***

In January 2023, the Special Environmental Study (SES) concerning Natura 2000 Areas of the Regional Units of Corfu, Kefalonia, Ithaca, Lefkada and Zakynthos was released for public consultation and MEDASSET, in collaboration with WWF Greece and ARCHELON, participated by submitting their comments. To this day, more than 2.5 years since its release, the SES has not yet been approved, and no draft presidential decree and draft management plan have been developed, and specifically a management plan has never been developed. There are serious concerns about the effectiveness of the management measures for the protection of *Caretta caretta*, especially for Laganas Bay nesting beaches and maritime area. MEDASSET commented on the problematic approach of zoning fragmentation suggested by the SES, in which it allowed for harmful land uses in the protection zones, excluded certain areas from the scope of the protected regime and allowed for the continuation of existing projects and activities (even the illegal ones, such as the businesses behind Dafni beach) regardless of the ecological needs of protected habitats and species.

The Greek Government recently initiated legal procedures for the declaration of two new national marine parks - one in the Ionian and one in the Aegean Sea - with the Special Environmental Studies (SES) released for public consultation until September 22, 2025. We will submit our comments to the SES, and will closely monitor the process until their adoption as well as the next steps that will hopefully lead to the official establishment of the parks.

**Update 13 February 2025**



**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

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

21 February 2025  
*Our Ref. 07.2025*

**Re: Urgent request for action 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 WWF Greece and ARCHELON, hereby submits an urgent request for action in relation to the Open File 1986/08: Greece: Recommendation No. 9 (1987) on the protection of *Caretta Caretta* in Laganas bay, Zakynthos, to be addressed at the 2025 spring meeting of the Bureau (8-10 April).

We report an outrageous violation of the Presidential Decree concerning the protection of Marathonisi islet, which is included in the protection status of the National Park of Laganas Bay and it is a Natura2000 site GR2210002. Needless to repeat that the islet within the Gulf of Laganas, is characterized by ecosystems of shrubs and forests in their central elevated part and by extensive ecosystems of limestone cliffs with chasmophytic vegetation on the steep coasts. At the northern end of the islet of Marathonisi, a protected species sand dune ecosystem is forming, which plays a decisive role in the biological cycle of the sea turtle *Caretta caretta*.

- Dated on 10<sup>th</sup> of February, we received complaints from citizens of Zakynthos about construction interventions on the island of Marathonisi (Nature Protection Area A2) with bulldozers for construction purposes! We immediately started to investigate the threat and requested from

NECCA (OFYPEKA) for their immediate action and for providing information to us about the interventions that are taking place as well as for photographic material.

- Dated on 19<sup>th</sup> of February we received a letter from NECCA (OFYPEKA) – enclosed in Greek and English – noting that they knew of the construction activities since November 2024 (they did not inform the collaborating NGOs MEDASSET, ARCHELON and WWF Greece and of course neither presented the information at the 44<sup>th</sup> Standing Committee meeting!) and that they took some step to pause the constructions (see detailed answer enclosed).
- Dated on 19<sup>th</sup> of February and at 2:11 pm, MEDASSET representative witnessed bulldozer in the forest of the protected area, which is in contradiction with the provisions of Presidential Decree [1272/D (27-11-2003)] and the applicable environmental national and EU legislation. **[Figure 1]**
- Dated on 20<sup>th</sup> of February at 9:47 am, a MEDASSET representative witnessed a fire in the forest area **[Figure 2]** which is in contradiction with the provisions of Presidential Decree [1272/D (27-11-2003)] and the applicable environmental national and EU legislation. We immediately requested from NECCA (OFYPEKA) to get us to the island by boat but they did not accommodate us for bureaucratic reasons. We requested from the police authorities to collaborate with the port authorities and reach the island by boat but they did not accommodate us for bureaucratic reasons.
- Dated on 21<sup>st</sup> of February we submitted an official report to the police and are awaiting for actions.

Considering the urgency of the matter:

**We encourage the Bern Convention Standing Committee:**

- To take under serious consideration the present follow-up letter in view of the 1<sup>st</sup> Bureau meeting 2025 (810 April, Strasbourg) and table the serious matter for discussion.
- To urge the Greek authorities to pause immediately any construction activities to the islet.

**We encourage the European Commission:**

- to attend the on-the-spot appraisal in Laganas Bay and urge the Greek authorities to conform with the national and EU legislation, impose appropriate and proportionate penalties for non-compliance, and follow up until the restoration of the sensitive areas in order to deter and prevent any further and continued violations throughout the entire protected area, including the area between Dafni and Gerakas beaches in the NMPZ.

We wish to encourage the collaboration between the Bern Convention and the European Commission in following up with the Greek Government on this matter.

We are at your disposal for any further information.

Yours sincerely,



Lily Venizelos

*MEDASSET President*

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

Enclosed:

Figures 1 - 2

Letter of NECCA (OFYPEKA) reply to our request for information, roof, pause of construction activities (original in Greek)

Official translation of NECCA (OFYPEKA) letter

CC:

Bern Convention, Council of Europe:

*Ms. Mikaël POUTIERS, Secretary of the Bern Convention*

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

*Ms. Eoghan KELLY, Coordinator*

European Commission, Directorate-General for Environment:

*Mr. Humberto DELGADO ROSA, Director for Biodiversity, DG Environment, European Commission*

*Mr. Yannis Couniniotis, Env. E.3 — Implementation and Support to Member States – Environmental Enforcement Ms. Anna Cheilari, Env. D.3 Natural Capital – Nature Protection*

*Ms. Florika Fink Hooijer, Director-General for Environment Mr. Andrea VETTORI, Head of Unit Nature Conservation*



**Marathonisi islet – protected area, February 19th. Heavy machinery (bulldozer) in red circle, boat and human presence in green circle and the building to be re-constructed in yellow arrow.**



**Marathonisi islet – protected area, February 20th. Smokes in red circles out of settin up fires in the protected forest area.**

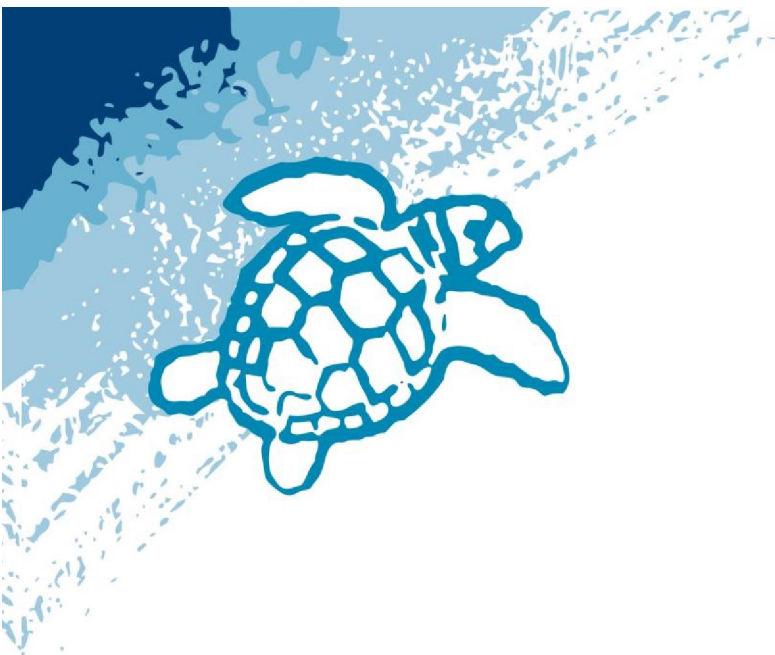
*With roots back to 1983, MEDASSET was founded in 1988 in England and 1993 in Greece. It is an international NGO registered as a not-for profit organisation in Greece. MEDASSET plays an active role in the study and conservation of sea turtles and their habitats throughout the Mediterranean, through scientific research, environmental education, lobbying relevant decision makers and raising public awareness. The organisation is a partner to the United Nations Environment Programme's Mediterranean Action Plan (UNEP/MAP) and a Permanent Observer-Member to the Bern Convention, Council of Europe, since 1988.*

---

#### 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: MIO/ECSDE & Greek Herpetological Society. Partner to UNEP/MAP - Permanent Observer-member of the Bern Convention.



**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](mailto:medasset@medasset.org)  
[www.medasset.org](http://www.medasset.org)  
[www.euroturtle.org](http://www.euroturtle.org)

**Mr Carl Amirgulashvili**

**Chair Standing Committee of the Bern Convention**

**Ms Jessika Roswall**

**Commissioner for Environment, Water Resilience and a Competitive Circular Economy**

**Re: Urgent request for action 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 WWF Greece and ARCHELON, hereby submits an update in relation to the Open File 1986/08: Greece: Recommendation No. 9 (1987) on the protection of *Caretta Caretta* in Laganas bay, Zakynthos, to be addressed at the 2025 spring meeting of the Bureau (8-10 April).

In reference to the violations that MEDASSET witnessed during its visits and we [presented](#) in the framework of the 44th Standing Committee and the Rec. No 174, no progress for their resolution has been witnessed. Below is a list for your reference:

- 1) The increased issuing of boat licenses leading to turtle spotting
- 2) The increasing uses of beaches and beach furniture
- 3) The human presence on the nesting beach at night
- 4) The delayed and partial application of roping to prevent human trampling of nests
- 5) The light pollution at night
- 6) The inconsistencies in the application of management measures across the whole ZNMP
- 7) The illegal developments despite court orders for demolition and environmental restoration
- 8) The recent developments regarding the illegal road opening case between Gerakas and Daphne.

**We encourage the Bern Convention Standing Committee:**

- to take under serious consideration the present letter in view of the 1<sup>st</sup> Bureau meeting 2025 (8-10 April, Strasbourg) and table the serious matter for discussion.

**To take any necessary initiative to advance the upcoming on-the-spot appraisal We encourage the European Commission:**

- to Perform an on-the-spot appraisal in Laganas Bay and urge the Greek authorities to conform with the national and EU legislation.

We wish to encourage the collaboration between the Bern Convention and the European Commission in following up with the Greek Government on this matter.

We are at your disposal for any further information.

Yours sincerely,



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: MIO/ECSDE & Greek Herpetological Society. Partner to UNEP/MAP - Permanent Observer-member of the Bern Convention.

Lily Venizelos

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

CC:

Bern Convention, Council of Europe:

Ms. Mikaël POUTIERS, Secretary of the Bern Convention

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

Ms. Eoghan KELLY, Coordinator

European Commission, Directorate-General for Environment:

Mr. Humberto DELGADO ROSA, Director for Biodiversity, DG Environment, European Commission

Mr. Yannis Couniniotis, Env. E.3 — Implementation and Support to Member States – Environmental Enforcement Ms. Anna Cheilari, Env. D.3 Natural Capital – Nature Protection

Ms. Florika Fink Hooijer, Director-General for Environment Mr. Andrea VETTORI, Head of Unit Nature Conservation

*With roots back to 1983, MEDASSET was founded in 1988 in England and 1993 in Greece. It is an international NGO registered as a not-for profit organisation in Greece. MEDASSET plays an active role in the study and conservation of sea turtles and their habitats throughout the Mediterranean, through scientific research, environmental education, lobbying relevant decision makers and raising public awareness. The organisation is a partner to the United Nations Environment Programme's Mediterranean Action Plan (UNEP/MAP) and a Permanent Observer-Member to the Bern Convention, Council of Europe, since 1988.*

Annexe I: Interventions with bulldozers on Marathonisi island inside the National Marine Park of Zakynthos



ΑΚΡΙΒΕΣ ΑΝΤΙΓΡΑΦΟ



Οργανισμός  
Φυσικού Περιβάλλοντος  
και Κλιματικής Αλλαγής

**Ο.Φ.Υ.Π.Ε.Κ.Α.**

Λεωφόρος Μεσογείων 207 - 2ος Όροφος  
11525 Αθήνα - τηλ.: 210 808 9271

ηλ. ταχ/μείο: [info@necca.gov.gr](mailto:info@necca.gov.gr) - ιστοσελίδα: [//necca.gov.gr](http://necca.gov.gr)

Ο.Φ.Υ.Π.Ε.Κ.Α. 18/02/2025

Α. Π.: 5266

Απάντηση στο έγγραφο: 4906

**ΓΕΝΙΚΗ ΔΙΕΥΘΥΝΣΗ  
ΔΙΕΥΘΥΝΣΗ ΔΙΑΧΕΙΡΙΣΗΣ ΠΡΟΣΤΑΤΕΥΟΜΕΝΩΝ  
ΠΕΡΙΟΧΩΝ ΤΟΜΕΑ Α**

**ΜΟΝΑΔΑ ΔΙΑΧΕΙΡΙΣΗΣ ΕΘΝΙΚΩΝ ΠΑΡΚΩΝ  
ΖΑΚΥΝΘΟΥ, ΑΙΝΟΥ ΚΑΙ ΠΡΟΣΤΑΤΕΥΟΜΕΝΩΝ  
ΠΕΡΙΟΧΩΝ ΙΟΝΙΩΝ ΝΗΣΩΝ**

Πληροφορίες: Laurent Sourbès  
Τηλέφωνο: 2695029870  
E-mail: [mdpp.ionian@necca.gov.gr](mailto:mdpp.ionian@necca.gov.gr)

**ΠΡΟΣ:**

1. Σύλλογο για την προστασία της θαλάσσιας  
χελώνας «ΑΡΧΕΛΩΝ»  
Υπόψη Διευθύντριας  
κας. Δάφνης Μαυρογιώργου  
Email: [info@archelon.gr](mailto:info@archelon.gr),  
[director@archelon.gr](mailto:director@archelon.gr)

**ΚΟΙΝ.:**

1. WWF Ελλάς  
Email: [tnantsou@wwf.gr](mailto:tnantsou@wwf.gr), [charmini@otenet.gr](mailto:charmini@otenet.gr)  
2. Σύλλογο Medasset  
Email: [medasset@medasset.org](mailto:medasset@medasset.org),  
[k.andreanidou@medasset.org](mailto:k.andreanidou@medasset.org)

**ΘΕΜΑ: Παρεμβάσεις με μπουλντόζες στη νήσο Μαραθωνήσι εντός του Εθνικού Θαλάσσιου  
Πάρκου Ζακύνθου**

Σχετ.: α. Η με αρ. πρωτ. 30084/2025 (αρ. πρωτ. Ο.Φ.Υ.Π.Ε.Κ.Α. 4906/2025) του Συλλόγου ΑΡΧΕΛΩΝ

Σε συνέχεια του ανωτέρω σχετικού, επιθυμούμε να σας ενημερώσουμε ότι ο Ο.Φ.Υ.Π.Ε.Κ.Α. ενημερώθηκε τον Νοέμβριο του 2024 για την επικείμενη έναρξη εργασιών στο νησί Μαραθωνήσι (Κόλπος Λαγανάς), κατ' εφαρμογή της υπ' αριθμ. πρωτ. 350496/21.01.2022 Οικοδομικής Άδειας για το έργο «Αποκατάσταση ιστορικού συμπλέγματος ιδιωτικού ιερού ναού, πύργου και αγροικίας». Κατόπιν της ενημέρωσης αυτής, και λαμβάνοντας υπόψη το θεσμικό πλαίσιο που διέπει το χώρο του Εθνικού Θαλάσσιου Πάρκου Ζακύνθου και συγκεκριμένα την Περιοχή της Φύσης Α2 σύμφωνα με το Π.Δ. 906/Δ'/1999 όπως ισχύει, ο Ο.Φ.Υ.Π.Ε.Κ.Α. προέβη σε αίτημα αναστολής έναρξης εργασιών (αρ. πρωτ. Ο.Φ.Υ.Π.Ε.Κ.Α. 34560/15.11.2024) προς την εταιρεία στην οποία εκδόθηκε η οικοδομική άδεια, και μετέπειτα αίτημα ανάκλησης της εν λόγω οικοδομικής άδειας (αρ. πρωτ. Ο.Φ.Υ.Π.Ε.Κ.Α. 36228/30.11.2024) προς την Υπηρεσία Δόμησης Ζακύνθου. Στη συνέχεια, και εφόσον άρχισε η μεταφορά υλικών κατασκευής και μηχανημάτων (όπως π.χ. μπουλντόζα) στο Μαραθωνήσι, ο Ο.Φ.Υ.Π.Ε.Κ.Α. προέβη στην αποστολή της με αρ. πρωτ. Ο.Φ.Υ.Π.Ε.Κ.Α. 4220/10.02.2025 επιστολής για την άμεση παύση εργασιών στην ιδιοκτήτρια εταιρεία του Μαραθωνησίου, με ταυτόχρονη ενημέρωση των αρμόδιων υπηρεσιών. ο Ο.Φ.Υ.Π.Ε.Κ.Α. δεν έχει λάβει έως σήμερα απάντηση από την Υπηρεσία Δόμησης Ζακύνθου για το αίτημα ανάκλησης της συγκεκριμένης οικοδομικής άδειας.

**Η ΠΡΟΪΣΤΑΜΕΝΗ ΤΗΣ ΓΕΝΙΚΗΣ  
ΔΙΕΥΘΥΝΣΗΣ**

**Ελένη Κουμούτσου**

**OFFICIAL TRANSLATION***Unique serial number : DOaDsruCkLQCL74sZPjaXw*

0000136009

TRUE COPY

NATIONAL ENVIRONMENT AND  
CLIMATE CHANGE AGENCY (N.E.C.C.A.)

Address: 207, Mesogeion Avenue - 2<sup>nd</sup> floor

P.C.: 11525 Athens – Telephone: 210 808 9271

Email: [info@necca.gov.gr](mailto:info@necca.gov.gr) // Website: [//necca.gov.gr](http://necca.gov.gr)

N.E.C.C.A., 18/02/2025

Ref. No.: 5266

Reply to document: 4906

GENERAL DIRECTORATE  
PROTECTED AREAS MANAGEMENT  
DIRECTORATE (SECTOR A)

MANAGEMENT UNIT OF ZAKYNTHOS AND  
AINOS NATIONAL PARKS AND PROTECTED  
AREAS OF THE IONIAN ISLANDS

Enquiries: Laurent Sourbès

Telephone: 2695029870

E-mail: [mdpp.ionian@necca.gov.gr](mailto:mdpp.ionian@necca.gov.gr)

TO:

1. “ARCHELON” The Sea Turtle  
Protection Society of Greece

To the attention of the Director:

Ms. Daphne Mavrogiorgos

Email: [info@archelon.gr](mailto:info@archelon.gr),

[director@archelon.gr](mailto:director@archelon.gr)

C.C.:

1. WWF Greece

Email: [tnantsou@wwf.gr](mailto:tnantsou@wwf.gr), [charmini@otenet.gr](mailto:charmini@otenet.gr)

2. MEDASSET Association

Email: [medasset@medasset.org](mailto:medasset@medasset.org),

[k.andreanidou@medasset.org](mailto:k.andreanidou@medasset.org)

Subject: Interventions with bulldozers on Marathonisi island inside the National Marine Park of Zakynthos

Rel.: a. The document under Ref. No 30084/2025 (Ref. No: 4906/2025 of N.E.C.C.A.) of ARCHELON Society

Following the above relevant document, we would like to inform you that the National Environment and Climate Change Agency (N.E.C.C.A.) was informed in November 2024 about the forthcoming commencement of works on Marathonisi island (Laganas Bay), in accordance with the Building Permit under Ref. No. 350496/21.01.2022 with regard to the project “Rehabilitation of a historical complex consisting of a private holy church, a tower and a cottage”. After having been informed and having taken

ALEXANDRA G. KOUTRA

CERTIFIED TRANSLATOR OF THE MINISTRY OF FOREIGN AFFAIRS  
OF THE HELLENIC REPUBLIC – REG. No: 065

35 Charitos Street – 10675 Athens, Greece

T. 6944665534 / E-mail: [alexandrakoutra@gmail.com](mailto:alexandrakoutra@gmail.com)

**OFFICIAL TRANSLATION***Unique serial number : DOaDsruCkLQCL74sZPjaXw*

into consideration the institutional framework for the area of the National Marine Park of Zakynthos, and particularly for the Nature Protection Area A2 in accordance with P.D. 906/D'/1999 as in force, the National Environmental and Climate Change Agency (N.E.C.C.A.) sent a request for suspension of the commencement of works (under N.E.C.C.A. Ref. No 34560/15.11.2024) to the company in whose name the building permit had been issued and afterwards, it sent a request for suspension of the building permit in question (under N.E.C.C.A. Ref. No.: 36228/30.11.2024) to the Building Authority of Zakynthos. Then, when the transportation of construction materials and machinery began (e.g. a bulldozer) on Marathonisi island, the National Environmental and Climate Change Agency (N.E.C.C.A.) sent the letter under N.E.C.C.A. Ref. No 4220/10.02.2025 regarding immediate cessation of work to the owner - company of Marathonisi and at the same time, it informed the competent Services / Authorities. The National Environment and Climate Change Agency (N.E.C.C.A.) has not received any reply up to this day from the Building Authority of Zakynthos about the request for suspension of that particular building permit.

The Head of the General Directorate

ELENI KOUMOUTSOU

19.02.2025 10:11:54

True copy

Digitally signed by Maria Arvanitaki

True copy

11. MANAGEMENT UNIT OF ZAKYNTHOS AND AINOS NATIONAL PARKS AND  
PROTECTED AREAS OF THE IONIAN ISLANDS

Arvanitaki Maria

*Total number of pages of the original document: 2 / Total number of pages of the translation: 2  
Official translation - True and accurate translation of a true copy of the original (computer-generated)  
document from Greek into English*

*Athens, 21.02.2025**Alexandra Koutra, Certified Translator of the Ministry of Foreign Affairs – Reg. No: 065**35 Charitos Street - 10675 Athens, Greece / Tel.: +30 6944665534 / [alexandrakoutra@gmail.com](mailto:alexandrakoutra@gmail.com)*

**ALEXANDRA**  
**KOUTRA**

Digitally signed by

ALEXANDRA KOUTRA

Date: 2025.02.21 10:18:09

+02'00'

**ALEXANDRA G. KOUTRA**

**CERTIFIED TRANSLATOR OF THE MINISTRY OF FOREIGN AFFAIRS  
OF THE HELLENIC REPUBLIC – REG. No: 065**

**35 Charitos Street – 10675 Athens, Greece****T. 6944665534 / E-mail: [alexandrakoutra@gmail.com](mailto:alexandrakoutra@gmail.com)**