



Strasbourg, 27 February 2025

TPVS/Files(2025)1986-8\_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE AND  
NATURAL HABITATS

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**Standing Committee**  
45<sup>th</sup> meeting  
Strasbourg, 8-12 December 2025

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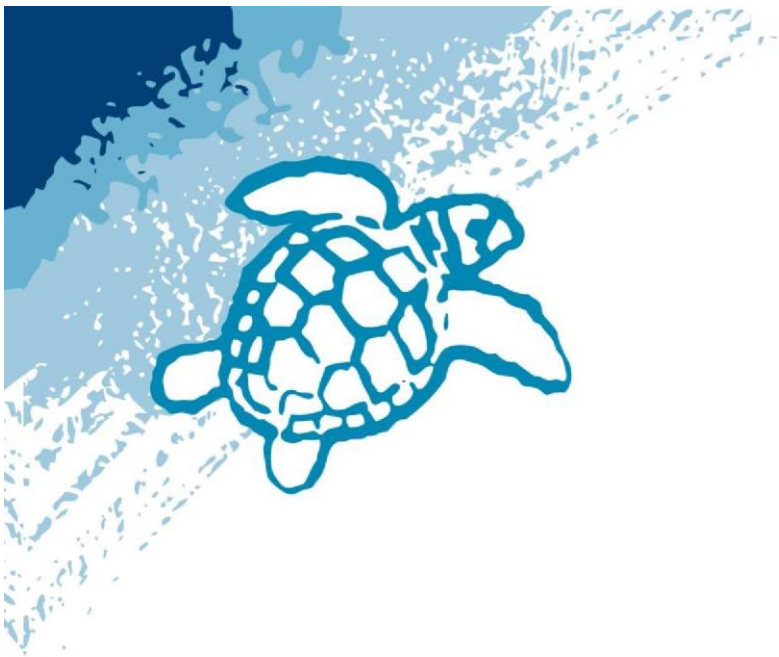
**Bureau of the Standing Committee**  
8-10 April 2025  
Strasbourg

**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*

**MEDASSET**Mediterranean Association  
to Save the Sea TurtlesLicavitou 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 Couninotis, 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.*

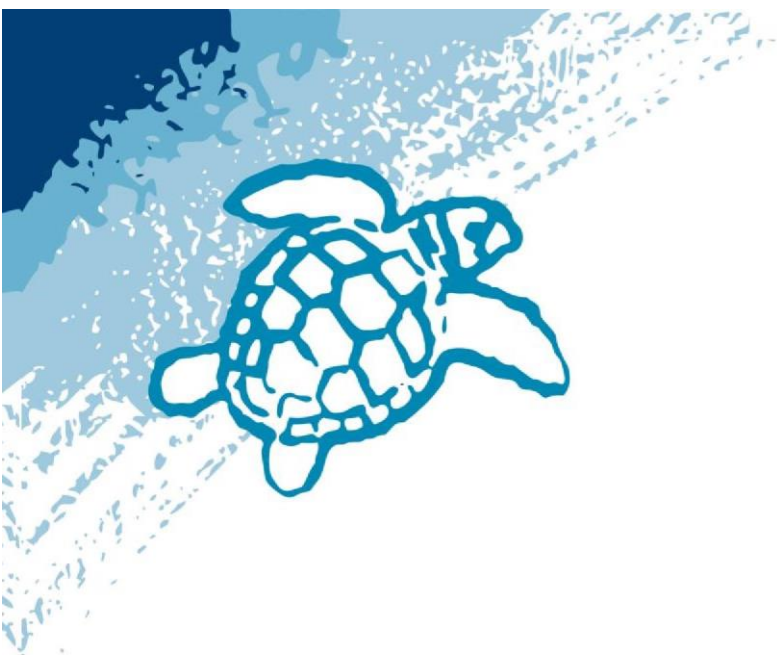
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#### Protecting marine biodiversity in the Mediterranean since 1988

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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

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****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

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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

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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

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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

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)

Enquiries: Laurent Sourbès  
Telephone: 2695029870  
E-mail: [mdpp.ionian@necca.gov.gr](mailto:mdpp.ionian@necca.gov.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

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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

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**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)