Strasbourg, 10 September 2026 **T-PVS/Files(2026)1995-06_comp_rev**

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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Standing Committee
46th meeting
Strasbourg, 7-11 December 2026

Bureau of the Standing Committee
22-24 September 2026
Strasbourg

Open File: 1995/06

Akamas Peninsula (Cyprus)

-COMPLAINANT REPORT-

Document prepared by Terra Cypria

Update for the Autumn Bureau Meeting

July 30

TERRA CYPRIA
Το Κυπριακό Ίδρυμα Προστασίας του Περιβάλλοντος
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Abstract

In 1987, the ***Recommendation No. 7 (1987) on the protection of marine turtles and their habitat*** [**T-PVS (1987) 7**] was issued. In 1995, a complaint was filed by Terra Cypria, and the open casefile was registered (**1995/6**). In 1997, a Report of the on-the-spot appraisal by an independent expert was issued by the Standing Committee [**T-PVS (97) 21**], followed by the ***Recommendation No. 63 (1997) on the conservation of the Akamas peninsula, Cyprus, and particularly of the nesting beaches of Caretta caretta and Chelonia mydas*** [**T-PVS (97) 63**]. In 2002, another Report of the on-the-spot appraisal by an independent expert was issued by the Standing Committee [**T-PVS (2002) 1**]. In 2016, a new Report of the on-the-spot appraisal by an independent expert was issued [**T-PVS (2016) 44**], followed by the ***Recommendation No. 191 (2016) on the conservation of the Akamas Peninsula and the sea turtle nesting beaches of Chrysochou Bay*** [**T-PVS (2016) 29**]. Following the adoption of the latest Recommendation, we would like to inform the Bureau that the Government of the Republic of Cyprus has not yet implemented most of the 13 points included the Recommendation. At the same time, for some points it is evident that the Government is not willing to implement them and for others is not well organised to implement them fully and in accordance with the Recommendation. **In this framework, we firmly believe and strongly encourage the Bureau to bring the open casefile for discussion at the Standing Committee meeting this December**.

Brief account of the current situation regarding Akamas Peninsula and Limni Area, Chrysochou Bay

I. Akamas Peninsula

The Government is still unwilling to expand the current Natura 2000 boundaries and, furthermore, is unwilling to declare the whole of the Akamas Peninsula as an IUCN National Park, an UNESCO Biosphere Reserve, or a Protected Area with comparable international protected status (**Rec. 1**). The area designated as a **National Forest Park (NFP)** is only 7.662 hectares (ha), as the terrestrial part of the Natura 2000 sites in Akamas Peninsula – **Site of Community Importance (SCI)/Special Area of Conservation (SAC)** Chersonisos Akama (CY4000010) and **Special Protection Area (SPA)** Chersonisos Akama (CY4000023) – have diminished significantly from those initially proposed.

According to the *Conservation Management Plan for the Akamas Peninsula*, issued in 1996, a terrestrial area of about 23.000 ha was proposed to be designated as an UNESCO Biosphere Reserve. According to the *Final Report of the Project Special Areas of Conservation (Directive 92/43/EEC) in Cyprus (LIFE98 TCY/CY/172)*, issued in 2003, a terrestrial area of about 17.690 ha was proposed to be included in the Natura 2000 Network. However, only a terrestrial area of about 10.163 ha was included in the Natura 2000 sites in Akamas Peninsula, between 2009 (SPA) and 2010 (SCI/SAC), of which 7.662 ha cover state forest land and include the Akamas NFP.

At the same time the whole Akamas Peninsula and its Natura 2000 sites is fragmented between two Local Plans which one was published in February 2023 and approved in November 2024 (*Local Plan of Akamas Communities*), and the other is under preparation since January 2016 (*Pegeia Local Plan*). The *Local Plan of Akamas Communities* outlines, amongst other things, where and what type of developments can take place within it. The Town Planning and Housing Department has decided to fragment the Akamas Peninsula into two different Local Plans, despite the strong opposition of the authorities dealing with nature protection, as well as **Environmental Non-Governmental Organisations (ENGOs)** and other stakeholders. For example, the spatial planning of the Lara-Toxeftra **Marine Protected Area (MPA)**, which is also designated as a **Specially Protected Area of Mediterranean Importance (SPAMI)** by UNEP-MAP/RAC-SPA, is fragmented into two parts, of which one includes Lara (*Local Plan of Akamas Communities*) and the other Toxeftra (*Pegeia Local Plan*).

This development is in direct contradiction to the **conclusions of the *Report of the on-the-spot appraisal issued* in 2016 h [T-PVS/Files (2016) 44]**, according to which: "*A nesting site should be considered as a unit and managed as such. Since anthropogenic impacts are cumulative, any impact assessment should be also done cumulatively at the whole nesting beach level (i.e. a development plan of the entire area and with estimates of potential light pollution and human visitors at the beach). It should not be for individual sub-units (i.e. fragmented plans and single projects), because each individual plan and project might be independently considered as sustainable and therefore approved. However, we believe that this would result in a non-sustainable overall effect by multiple projects*".

Additionally, the protection and management of the Natura 2000 sites seem to be treated by the government differently as two different types of Natura 2000 areas. The one type includes the state forest land that covers approximately 75% and the second type includes privately-owned land that covers approximately 25% of the Natura 2000 sites in Akamas Peninsula (SCI/SAC CY4000010 and SPA CY4000023). Following the points raised above as well as other factors mentioned below, the whole area still cannot be appropriately and holistically managed in a sustainable, integrated way (**Rec. 1**).

Furthermore, the Government has not achieved to adequately protect the area without undermining the existing good conservation status of the habitats and species of the designated Natura 2000 sites in Akamas Peninsula (SCI/SAC CY4000010 and SPA CY4000023) (**Rec. 2**). It is noted that, in the framework of an active infringement procedure

(**Ref. 2018/2058**) on the insufficient designation of Natura 2000 Network in Cyprus, the European Commission sent a Letter of Formal Notice on 17.05.2018 and a Reasoned Opinion on 30.10.2020. Major gaps remain regarding the adequate representativity of several types of natural habitats, as well as species of wild flora and fauna in Cyprus, many of which are found in the Akamas Peninsula, but are not sufficiently protected, such as the semi-endemic and priority species of the Cyprus bee orchid (**Ophrys Kotschyi*), the Egyptian fruit bat (*Rousettus aegyptiacus*) and the Mediterranean horseshoe bat (*Rhinolophus euryale*).

Furthermore, the Government, still, has not yet put into force any appropriate management measures through legally binding mechanisms (e.g. Decrees for the Protection and Management of the Natura 2000 areas in Akamas Peninsula, SCI/SAC CY4000010 and SPA CY4000023). It is important to highlight that such measures are foreseen by the proposed Management Plans which still do not have legal force. It is noted that, in the framework of an active infringement procedure (**Ref. 2021/2064**) on the inadequate management of Natura 2000 Network protected areas in Cyprus, the European Commission sent a Letter of Formal Notice on 09.06.2021 and a Reasoned Opinion on 06.04.2022, as SACs and SPAs are not adequately protected in Cyprus, while adequate conservation objectives and management measures have not yet been established for the protected areas of the Natura 2000 Network, including Akamas Peninsula. Judgments of the **European Court of Justice (ECJ)** on related infringement procedures have been issued on 17.12.2020, *European Commission versus Greece* (**C-849/19**), on 29.06.2023, *European Commission versus Ireland* (**C-444/21**) and on 21.09.2023, *European Commission versus Germany* (**C-116/22**). Thus, on 13.03.2024, the European Commission decided the referral of the case against the Republic of Cyprus to the ECJ, and the application was filed on 18.02.2026 (**C-112/26**).

Based on the above, the Government has not promptly commenced the implementation of the protection measures of the management plans of the Natura 2000 sites in Akamas Peninsula (SCI/SAC CY4000010 and SPA CY4000023), which were formulated in 2016, through appropriate and adequate funding. Thus, the Government has not managed to preserve the good conservation status of the habitats and species of the Natura 2000 sites (**Rec. 6**).

Moreover, there is no management body in place or an entity, with scientific staff and wardens, and no monitoring mechanism to react promptly to and stop any illegal activities that take place within the peninsula. Generally, the fragmentation of responsibilities between different authorities, results in a difficult/problematic coordination when several illegalities occur in Akamas Peninsula and the adjacent SCI/SAC Periochi Polis-Gialia (CY4000001) in Chrysochou Bay. Currently there are no mechanisms in place to deal with issues like permits, supervision of permitted works and activities, early response and intervention, accountability, and imposing penalties and/or fines (**Rec. 3**).

As a result of the lack of controlled, organised and holistic management, there is also a lack of adequate patrolling within the area. Still some umbrellas and tents are seen at some nesting beaches, imposing a great threat to the turtle nests and even human presence after the warrant time is in force. In the past few years, rangers hired by the Department of Fisheries and Marine Research, are patrolling the nesting beaches of MPA/SPAMI Lara-Toxeftra and SCI/SAC Polis-Gialia Area and are authorized to issue fines on the spot and hopefully to discourage this illegal activity. The number of rangers though, still cannot be considered adequate to cover the needs of all beaches, including weekends and overtimes, as was also noticed during the previous years where, after the rangers' shift is finished, umbrellas, tents and sunbeds are

put on the beaches. Additionally, a sea patrolling must be put in place urgently.

Another year goes by where the Government has not shut down or removed the illegal restaurants and beach bars within and adjacent to the Lara and Toxeftra turtle nesting beaches, where they have been operating illegally for years. Even more, while driving in Akamas, one can see several advertisement signs of the illegal facilities as if they are legally operating. Within 2025, two new snack bars are illegally installed and operating within the Natura 2000 sites, situated in Aspros River and Avakas Gorge, both of which are important nesting sites for raptors, such as the Bonelli's eagle (*Aquila fasciata*), the Long-legged buzzard (*Buteo rufinus*) and the Peregrine falcon (*Falco peregrinus*) (**Rec. 9**).

Through the *Sustainable Development Plan of Akamas NFP*, official proposals foresee several upgrades of the road network and the creation of several new refreshment kiosks/snack bars, souvenir shops and parking lots, throughout the Natura 2000 sites, including two kiosks within and adjacent to the MPA/SPAMI Lara-Toxeftra and the main nesting beaches of the Green turtle (**Chelonia mydas*) and the Loggerhead turtle (**Caretta caretta*). Thus, the Government has not managed to preserve the good conservation status of the habitats and species of the Natura 2000 sites, as well as to maintain the strict protection provided, so far, in the areas of Lara and Toxeftra (**Rec. 6**). All these facilities, along with the upgrading of the road network, will increase the pressure from visitors thus the pressure on the Natura 2000 sites (**Rec. 7-8**). The *Sustainable Development Plan of the Akamas NFP* covers exclusively state forest land and includes approximately 75% of the overall Natura 2000 sites, something which implies a significant and negative impact in the core area of the Akamas Peninsula. The plan includes the improvement of 11 existing main roads and the construction of 14 new facility nodes within Akamas NFP and the Natura 2000 sites. The plan is not directly connected with or necessary to the management of the Natura 2000 sites in Akamas Peninsula, but is likely to have a significant effect thereon, either individually or in combination with other plans or projects. The largest part of the project for the improvement of the main forest roads within the Akamas NFP (Phase A) has been implemented in violation of the legally binding and substantial terms of the **Appropriate Assessment (AA)** Report, issued at the stage of **Strategic Environmental Assessment (SEA)** for the plan as a whole. The project for the improvement of the main forest roads within the Akamas NFP (Phase A) has not been subject to AA, at the stage of **Environmental Impact Assessment (EIA)** as a single project. Currently, the works within the Akamas NFP have stopped, until the re-assessment of the *Sustainable Development Plan of Akamas NFP*. Additionally, to the pre-existing pressures and threats to the area, we see a great disturbance by the works, also with no patrolling and/or monitoring. We see that no sufficient precautionary measures are being taken for the protection of species and habitats (e.g. sea turtle nesting beaches, sand dune systems, raptors' nesting sites, bat shelters, eel habitats, etc.), by what is being done, but on contrary, protection measures previously set to protect the area have now been removed, leaving Akamas Peninsula, particularly during the touristic period, open to all sorts of dangers. This year we have again seen quad bikes and cars on the sand dunes and turtle nesting sites. These works are expected to finish in 2027 and until then, the area must be closely monitored since the threats are high.

The *Local Plan of Akamas Communities* was published in February 2023 and was approved following the submission and examination of appeals in November 2024. Currently, a lot of pressure is imposed by the quarrying companies, demanding the extension of the existing and the creation of a new Quarrying Zone adjacent to the Natura 200 sites, near the satellite area of Androlikou Gorges. The extension of the existing Quarrying Zone is currently under

assessment. The creation of the new Quarrying Zone has been subject to a joint SEA and AA procedure for the *Local Plan of Akamas Communities*. Although this provision has been rejected in August 2023, it is foreseen that during the next three years the following will be studied:

- To what extent is the need to create a new Quarrying Zone of aggregates, in Androlikou Gorges, is imperative compared to available alternative placements.
- The conservation status of the area's habitats and species in relation to quarrying activities.

It is noted that, on May 2024, the Mines and Quarries Service has launched a public procurement for the preparation of a joint EIA and AA study for the creation of a new Quarrying Zone in Androlikou, adjacent to the Natura 2000 sites. However, the EIA and AA study does not examine to what extent is the need to create a new Quarrying Zone of aggregates is imperative compared to other available alternative placements. This revision was proposed by the Mines and Quarries Service and was approved by the Environment Department, without following the AA procedure, as it is foreseen by Article 6.3 of the Directive 92/43/EEC.

Following the above, we believe this cannot be considered satisfactory for the protection of priority species since the option of a new Quarrying Zone in the area remains an option. This new Quarrying Zone fails to justify its necessity and other *imperative reasons of overriding public interest* (Article 6.4, 92/43/EEC), since there are sufficient reserves in the existing quarry next to the proposed new quarry, as well as in other quarrying areas in other parts of Cyprus, which are less environmentally sensitive and can cover the needs of Paphos District. Thus, the EIA and AA study does not examine the necessity to create a new Quarrying Zone in Androlikou Gorges and does not justify why this is imperative compared to other available alternative placements.

Regarding the new Quarrying Zone, the SEA Opinion (February 2021) states: «*…alternative mining locations for the material have already been unsuccessfully proposed. Given the presence and potential impact on the priority species, Article 6.4 of Directive 92/43/EEC should be activated which requires the Commission's Opinion, to other imperative reasons of overriding public interest*». The AA Report (February 2021) also states: «*The operation of a Quarrying Zone in an area adjacent to the Natura 2000 network will lead to permanent irreversible and widespread adverse effects on the species for which the area has been designated as a Natura 2000 site, due to human presence as well as noise pollution, explosions, vibrations, dust and the constant movement of heavy vehicles. It is estimated that the creation of the Quarrying Zone will strongly affect the species of fauna (birds and bats) that use both the wider and the exclusive area*».

It is noted that, in the framework of an active infringement procedure (**Ref. 2019/2303**) on the inadequate AA of several plans and projects in Cyprus, the European Commission sent a Letter of Formal Notice on 27.11.2019 and a Reasoned Opinion on 13.03.2024. Seven out of 29 projects included in the active infringement procedure and have not been subject to AA are situated within and/or adjacent to Natura 2000 areas in Akamas Peninsula. These seven projects include two limestone quarries that have been expanded in Androlikou Gorges, an important habitat of the Egyptian fruit bat (*Rousettus aegyptiacus*), the Bonelli's eagle (*Aquila fasciata*), the Long-legged buzzard (*Buteo rufinus*), the Peregrine falcon (*Falco peregrinus*), the Roller (*Coracias garrullus*), the Cyprus wheatear (*Oenanthe cypriaca*), the

Cyprus warbler (*Curruca melanothorax*) and the Cyprus owl (*Otus cyprius*). The other five out of seven projects that are in Akamas Peninsula include four residential and tourist developments, as well as one coastal pedestrian road, that have already been constructed in the area of Pegeia sea caves, an important habitat of the Mediterranean monk seal (**Monachus monachus*), the Lesser mouse-eared bat (*Myotis blythii*), the Common bent-wing bat (*Miniopterus schreibersii*), the Squacco heron (*Ardeola ralloides*), the Little egret (*Egretta garzetta*), the Glossy ibis (*Plegadis falcinellus*) and the Demoiselle crane (*Grus virgo*).

Furthermore, the Petition Committee of the European Parliament is currently examining two petitions by ENGOs on alleged violations of EU environmental legislation and development projects in the Akamas Peninsula in Cyprus. The petitions have been presented and discussed on two sessions of the Petition Committee, on 24.05.2023, 14.02.2024 and 25.02.2026. Currently, the petitions remain open.

II. Limni Area, Chrysochou Bay

Regarding the proposal for the construction and operation of the *Limni Bay Project*, including two golf courses, approximately 800 villas, a two-storey hotel, commercial facilities and related infrastructure in Limni, the Government gave the green light to the private company to go ahead with its plans in August 2018. This ignored the 500-meter zero building/lighting zone from the sea, which would have minimised lighting and human disturbance problems to the sea turtle nesting beach.

Since then, the Government has not ensured, through a new AA report, that the golf project will not affect the Natura 2000 site SCI/SAC Polis-Gialia Area (CY4000001) and especially the exceptional nesting beach of Limni. In this context, the Government has not avoided housing and has not established a zero-lighting zone in an area of at least 200 meters south of the boundaries of the Natura 2000 site (**Rec. 11**). Furthermore, the Government has not taken appropriate measures to avoid light pollution impacts on the beach from the planned road that will be connecting the golf development with the existing coastal road and protect the beaches from light pollution in the entire coastal length of the Natura 2000 site (**Rec. 12**).

With the closing of the infringement procedure against Cyprus over the *Limni Bay Project* by the European Commission (**Ref. 2014/4091**), and the Planning Permits already granted by the Town Planning and Housing Department (issued on 08.02.2013 and re-issued on 03.08.2018), the green light was given to begin development. With the Planning Permits in force until 08.02.2025 and the possibility of expansion until 08.02.2031, it is still uncertain how the project will proceed. In the past few years, the land property of the licenced project, was sold by the owner company to a Cypriot Bank and then each of the two golf courses was sold by the Cypriot Bank to two other private companies. In January 2025, both companies submitted new applications for the expansion of the Planning Permits of each golf course until 08.02.2031, but the official decision of the Town Planning and Housing Department remains unknown until today, while these applications have not been subject to a joint AA and EIA procedure after January 2025.

The concerns are great considering the granted Planning Permits and that an investor might buy at any time the licences and proceed with the development. With everything ready for development, the significant ecological value, conservation targets and integrity of the area is still in imminent threat. It is stressed that the European Commission has decided to re-include *Limni Bay Project* in the ongoing infringement procedure (**Ref. 2019/2303**) on the

inadequate AA of several plans and projects in Cyprus, in the framework of the Reasoned Opinion sent recently, on 13.03.2024. It is noted that the *Chrysochou Bay Local Development Plan* has been adopted in 2015, amended in 2021 and approved in 2024, without being subject to a joint SEA and AA procedure, to ensure that its provisions, policy measures and planning zones will not affect the conservation targets and the integrity of the nesting habitats of marine turtles (**Rec. 13**) and the Natura 2000 site SCI/SAC Polis-Gialia Area (CY4000001).

In this framework, we firmly believe and strongly encourage the Bureau to bring the open casefile for discussion at the Standing Committee this December. Thank you for your cooperation and we remain at your disposal for any further information and/or clarification.

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Το Κυπριακό Ίδρυμα Προστασίας του Περιβάλλοντος
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25 February 2026

Open casefile 1995/6: Cyprus – Akamas Peninsula
Bureau Report

Abstract
In 1987, the ***Recommendation No. 7 (1987) on the protection of marine turtles and their habitat*** [**T-PVS (1987) 7**] was issued. In 1995, a complaint was filed by Terra Cypria and the open casefile was registered (**1995/6**). In 1997, a Report of the on-the-spot appraisal by an independent expert was issued by the Standing Committee [**T-PVS (97) 21**], followed by the ***Recommendation No. 63 (1997) on the conservation of the Akamas peninsula, Cyprus, and particularly of the nesting beaches of Caretta caretta and Chelonia mydas*** [**T-PVS (97) 63**]. In 2002, another Report of the on-the-spot appraisal by an independent expert was issued by the Standing Committee [**T-PVS (2002) 1**]. In 2016, a new Report of the on-the-spot appraisal by an independent expert was issued [**T-PVS (2016) 44**], followed by the ***Recommendation No. 191 (2016) on the conservation of the Akamas Peninsula and the sea turtle nesting beaches of Chrysochou Bay*** [**T-PVS (2016) 29**]. Following the adoption of the latest Recommendation, we would like to inform the Bureau that the Government of the Republic of Cyprus has not yet implemented most of the 13 points included the Recommendation. At the same time, for some points it is evident that the Government is not willing to implement them and for others is not well organised to implement them fully and in accordance with the Recommendation. **In this framework, we firmly believe and strongly encourage the Bureau to bring the open casefile for discussion at the Standing Committee meeting this December.**

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According to the *Conservation Management Plan for the Akamas Peninsula*, issued in 1996, a terrestrial area of about 23.000 ha was proposed to be designated as an UNESCO Biosphere Reserve. According to the *Final Report of the Project Special Areas of Conservation (Directive 92/43/EEC) in Cyprus (LIFE98 TCY/CY/172)*, issued in 2003, a terrestrial area of about 17.690 ha was proposed to be included in the Natura 2000 Network. However, only a terrestrial area of about 10.163 ha was included in the Natura 2000 sites in Akamas Peninsula, between 2009 (SPA) and 2010 (SCI/SAC), of which 7.662 ha cover state forest land and include the Akamas NFP.

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At the same time the whole Akamas Peninsula and its Natura 2000 sites is fragmented between two Local Plans which one was published in February 2023 (*Local Plan of Akamas Communities*), and the other is under preparation since January 2016 (*Pegeia Local Plan*). The *Local Plan of Akamas Communities* outlines, amongst other things, where and what type of developments can take place within it. The Town Planning and Housing Department has decided to fragment the Akamas Peninsula into two different Local Plans, despite the strong opposition of the authorities dealing with nature protection, as well as **Environmental Non-Governmental Organisations (ENGOs)** and other stakeholders. For example, the spatial planning of the Lara – Toxeftra **Marine Protected Area (MPA)**, which is also designated as a **Specially Protected Area of Mediterranean Importance (SPAMI)** by UNEP-MAP/RAC-SPA, is fragmented into two parts, of which one includes Lara (*Local Plan of Akamas Communities*) and the other Toxeftra (*Pegeia Local Plan*).

This development is in direct contradiction to the **conclusions of the *Report of the on-the-spot appraisal issued* in 2016 h [T-PVS/Files (2016) 44]**, according to which: *"A nesting site should be considered as a unit and managed as such. Since anthropogenic impacts are cumulative, any impact assessment should be also done cumulatively at the whole nesting beach level (i.e. a development plan of the entire area and with estimates of potential light pollution and human visitors at the beach). It should not be for individual sub-units (i.e. fragmented plans and single projects), because each individual plan and project might be independently considered as sustainable and therefore approved. However, we believe that this would result in a non-sustainable overall effect by multiple projects".*

Additionally, the protection and management of the Natura 2000 sites seem to be treated by the government differently as two different types of Natura 2000 areas. The one type includes the state forest land that covers approximately 75% and the second type includes privately-owned land that covers approximately 25% of the Natura 2000 sites in Akamas Peninsula (SCI/SAC CY4000010 and SPA CY4000023). Following the points raised above as well as other factors mentioned below, the whole area still cannot be appropriately and holistically managed in a sustainable, integrated way (**Rec. 1**).

Furthermore, the Government has not achieved to adequately protect the area without undermining the existing good conservation status of the habitats and species of the designated Natura 2000 areas in Akamas Peninsula (SCI/SAC CY4000010 and SPA CY4000023) (**Rec. 2**). It is noted that, in the framework of an active infringement procedure (**Ref. 2018/2058**) on the insufficient designation of Natura 2000 Network in Cyprus, the European Commission sent a Letter of Formal Notice on 17.05.2018 and a Reasoned Opinion on 30.10.2020. Major gaps remain regarding the adequate representativity of several types of natural habitats, as well as species of wild flora and fauna in Cyprus, many of which are found in the Akamas Peninsula, but are not sufficiently protected, such as the Egyptian fruit bat (*Rousettus aegyptiacus*) and the Mediterranean horseshoe bat (*Rhinolophus euryale*).

Furthermore, the Government, still, has not yet put into force any appropriate management measures through legally binding mechanisms (e.g. Decrees for the Protection and Management of the Natura 2000 areas in Akamas Peninsula, SCI/SAC CY4000010 and SPA CY4000023). It is important to highlight that such measures are foreseen by the proposed Management Plans which still do not have legal force. It is noted that, in the framework of an active infringement procedure (**Ref. 2021/2064**) on the inadequate management of Natura 2000 Network protected areas in Cyprus, the European Commission sent a Letter of Formal Notice on 09.06.2021 and a Reasoned Opinion on 06.04.2022, as SACs and SPAs are not

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adequately protected in Cyprus, while adequate conservation objectives and management measures have not yet been established for the protected areas of the Natura 2000 Network, including Akamas Peninsula. Judgments of the **European Court of Justice (ECJ)** on related infringement procedures have been issued on 17/12/2020, *European Commission versus Greece* (**C-849/19**), on 29.06.2023, *European Commission versus Ireland* (**Case C-444/21**) and on 21.09.2023, *European Commission versus Germany* (**Case C-116/22**). Thus, on 13.03.2024, the European Commission decided the referral of the case against the Republic of Cyprus to the ECJ.

Based on the above, the Government has not promptly commenced the implementation of the protection measures of the management plans of the Natura 2000 areas in Akamas Peninsula (SCI/SAC CY4000010 and SPA CY4000023), which were formulated in 2016, through appropriate and adequate funding. Thus, the Government has not managed to preserve the good conservation status of the habitats and species of the Natura 2000 area (**Rec. 6**).

Moreover, there is no management body in place or an entity, with scientific staff and wardens, and no monitoring mechanism to react promptly to and stop any illegal activities that take place within the peninsula. Generally, the fragmentation of responsibilities between different authorities, results in a difficult/problematic coordination when several illegalities occur in Akamas Peninsula and Polis – Gialia area. Currently there are no mechanisms in place to deal with issues like permits, supervision of permitted works and activities, early response and intervention, accountability, and imposing penalties and/or fines (**Rec. 3**).

As a result of the lack of controlled, organised and holistic management, there is also a lack of adequate patrolling within the area. Still some umbrellas and tents are seen at some nesting beaches, imposing a great threat to the turtle nests and even human presence after the warrant time is in force. In the past few years, rangers hired by the Department of Fisheries and Marine Research, are patrolling the nesting beaches of MPA/SPAMI Lara – Toxeftra and SAC Polis – Gialia and are authorized to issue fines on the spot and hopefully to discourage this illegal activity. The number of rangers though, still cannot be considered adequate to cover the needs of all beaches, including weekends and overtimes, as was also noticed during the previous years where, after the rangers' shift is finished, umbrellas, tents and sunbeds are put on the beaches. Additionally, a sea patrolling must be put in place urgently.

Another year goes by where the Government has not shut down or removed the illegal restaurants and beach bars within and adjacent to the Lara and Toxeftra turtle nesting beaches, where they have been operating illegally for years. Even more, while driving in Akamas, one can see several advertisement signs of the illegal facilities as if they are legally operating. Within 2025, two new snack bars are illegally installed and operating within the Natura 2000 sites, situated in Aspros River and Avakas Gorge, both of which are important nesting sites for raptors, such as the Bonelli's eagle (*Aquila fasciata*), the Long-legged buzzard (*Buteo rufinus*) and the Peregrine falcon (*Falco peregrinus*) (**Rec. 9**).

Through the *Sustainable Development Plan of Akamas NFP*, official proposals foresee several upgrades of the road network and the creation of several new refreshment kiosks/snack bars, souvenir shops and parking lots, throughout the Natura 2000 sites, including two kiosks within and adjacent to the MPA/SPAMI Lara – Toxeftra and the main nesting beaches of the Green turtle (**Chelonia mydas*) and the Loggerhead turtle (**Caretta caretta*). Thus, the Government has not managed to preserve the good

conservation status of the habitats and species of the Natura 2000 area, as well as to maintain the strict protection provided, so far, in the areas of Lara and Toxeftra **(Rec. 6)**. All these facilities, along with the upgrading of the road network, will increase the pressure from visitors thus the pressure on the Natura 2000 sites **(Rec. 7-8)**. The *Sustainable Development Plan of the Akamas NFP* covers exclusively state forest land and includes approximately 75% of the overall Natura 2000 areas, something which implies a significant and negative impact in the core area of the Akamas Peninsula. The plan includes the improvement of 11 existing main roads and the construction of 14 new facility nodes within Akamas NFP and the Natura 2000 area. The plan is not directly connected with or necessary to the management of the Natura 2000 area in Akamas Peninsula, but is likely to have a significant effect thereon, either individually or in combination with other plans or projects. The largest part of the project for the improvement of the main forest roads within the Akamas NFP (Phase A) has been implemented in violation of the legally binding and substantial terms of the **Appropriate Assessment (AA)** Report, issued at the stage of **Strategic Environmental Assessment (SEA)** for the plan as a whole. The project for the improvement of the main forest roads within the Akamas NFP (Phase A) has not been subject to AA, at the stage of **Environmental Impact Assessment (EIA)** as a single project. Currently, the works within the Akamas NFP have stopped, until the re-assessment of the *Sustainable Development Plan of Akamas NFP*. Additionally, to the pre-existing pressures and threats to the area, we see a great disturbance by the works, also with no patrolling and/or monitoring. We see that no sufficient precautionary measures are being taken for the protection of species and habitats ex. sea turtle nests, sand dune systems, raptors' nesting sites, bat shelters, eel habitats, etc., by what is being done, but on contrary, protection measures previously set to protect the area have now been removed, leaving Akamas Peninsula, particularly during the touristic period, open to all sorts of dangers. This year we have again seen quad bikes and cars on the sand dunes and turtle nesting sites. These works are expected to finish in 2027 and until then, the area must be closely monitored since the threats are high.

The *Local Plan of Akamas Communities* was published in February 2023 and was approved following the submission and examination of appeals in November 2024. Currently, a lot of pressure is imposed by the quarrying companies, demanding the extension of the existing and the creation of a new Quarrying Zone adjacent to the Natura 200 sites, near the satellite area of Androlikou Gorges. The extension of the existing Quarrying Zone is currently under assessment. The creation of the new Quarrying Zone has been subject to a joint SEA and AA procedure for the *Local Plan of Akamas Communities*. Although this provision has been rejected in August 2023, it is foreseen that during the next three years the following will be studied:

- To what extent is the need to create a new Quarrying Zone of aggregates, in Androlikou Gorges, is imperative compared to available alternative placements.
- The conservation status of the area's habitats and species in relation to quarrying activities.

It is noted that, on May 2024, the Mines and Quarries Service has launched a public procurement for the preparation of a joint EIA and AA study for the creation of a new Quarrying Zone in Androlikou, adjacent to the Natura 2000 sites. However, the EIA and AA study does not examine to what extent is the need to create a new Quarrying Zone of aggregates is imperative compared to other available alternative placements. This revision was proposed by the Mines and Quarries Service and was approved by the Environment Department, without following the AA procedure, as it is foreseen by Article 6.3 of the Directive 92/43/EEC.

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Following the above, we believe this cannot be considered satisfactory for the protection of priority species since the option of a new Quarrying Zone in the area remains an option. This new Quarrying Zone fails to justify its necessity and other *imperative reasons of overriding public interest* (Article 6.4, 92/43/EEC), since there are sufficient reserves in the existing quarry next to the proposed new quarry, as well as in other quarrying areas in other parts of Cyprus, which are less environmentally sensitive and can cover the needs of Paphos District. Thus, the EIA and AA study does not examine the necessity to create a new Quarrying Zone in Androlikou Gorges and does not justify why this is imperative compared to other available alternative placements.

Regarding the new Quarrying Zone, the SEA Opinion (February 2021) states: «*...alternative mining locations for the material have already been unsuccessfully proposed. Given the presence and potential impact on the priority species, Article 6.4 of Directive 92/43/EEC should be activated which requires the Commission's Opinion, to other imperative reasons of overriding public interest*».

The AA Report (February 2021) also states: «*The operation of a Quarrying Zone in an area adjacent to the Natura 2000 network will lead to permanent irreversible and widespread adverse effects on the species for which the area has been designated as a Natura 2000 site, due to human presence as well as noise pollution, explosions, vibrations, dust and the constant movement of heavy vehicles. It is estimated that the creation of the Quarrying Zone will strongly affect the species of fauna (birds and bats) that use both the wider and the exclusive area*».

It is noted that, in the framework of an active infringement procedure (**Ref. 2019/2303**) on the inadequate AA of several plans and projects in Cyprus, the European Commission sent a Letter of Formal Notice on 27.11.2019 and a Reasoned Opinion on 13.03.2024. Seven out of 29 projects included in the active infringement procedure and have not been subject to AA are situated within and/or adjacent to Natura 2000 areas in Akamas Peninsula. These seven projects include two limestone quarries that have been expanded in Androlikou Gorges, an important habitat of the Egyptian fruit bat (*Rousettus aegyptiacus*), the Bonelli's eagle (*Aquila fasciata*), the Long-legged buzzard (*Buteo rufinus*), the Peregrine falcon (*Falco peregrinus*), the Roller (*Coracias garrullus*), the Cyprus wheatear (*Oenanthe cypriaca*), the Cyprus warbler (*Curruca melanothorax*) and the Cyprus owl (*Otus cyprius*). The other five out of seven projects that are in Akamas Peninsula include four residential and tourist developments, as well as one coastal pedestrian road, that have already been constructed in the area of Pegeia sea caves, an important habitat of the Mediterranean monk seal (**Monachus monachus*), the Lesser mouse-eared bat (*Myotis blythii*), the Common bent-wing bat (*Miniopterus schreibersii*), the Squacco heron (*Ardeola ralloides*), the Little egret (*Egretta garzetta*), the Glossy ibis (*Plegadis falcinellus*) and the Demoiselle crane (*Grus virgo*).

Furthermore, the Petition Committee of the European Parliament is currently examining two petitions by ENGOs on alleged violations of EU environmental legislation and development projects in the Akamas Peninsula in Cyprus. The petitions have been presented and discussed on two sessions of the Petition Committee, on 24.05.2023 and 14.02.2024. Currently, the petitions remain open.

II. Limni Area, Chrysochou Bay

Regarding the proposal for the construction and operation of the *Limni Bay Project*, including two golf courses and associated development, including approximately 800 villas, a two-storey hotel, commercial

facilities and related infrastructure in Limni, the Government gave the green light to the private company to go ahead with its plans in August 2018. This ignored the 500-meter zero building/lighting zone from the sea, which would have minimised lighting and human disturbance problems to the sea turtle nesting beach.

Since then, the Government has not ensured, through a new AA report, that the golf project will not affect the Natura 2000 site Periochi Polis – Gialia (CY4000001) and especially the exceptional nesting beach of Limni. In this context, the Government has not avoided housing and has not established a zero-lighting zone in an area of at least 200 meters south of the boundaries of the Natura 2000 site (**Rec. 11**). Furthermore, the Government has not taken appropriate measures to avoid light pollution impacts on the beach from the planned road that will be connecting the golf development with the existing coastal road and protect the beaches from light pollution in the entire coastal length of the Natura 2000 site (**Rec. 12**).

With the closing of the infringement procedure against Cyprus over the *Limni Bay Project* by the European Commission (**Ref. 2014/4091**), and the Planning Permits already granted by the Town Planning and Housing Department (issued on 08.02.2013 and re-issued on 03.08.2018), the green light was given to begin development. With the Planning Permits in force until 08.02.2025 and the possibility of expansion until 08.02.2031, it is still uncertain how the project will proceed. In the past few years, the land property of the licenced project, was sold by the owner company to a Cypriot Bank and then each of the two golf courses was sold by the Cypriot Bank to two other private companies. In January 2025, both companies submitted new applications for the expansion of the Planning Permits of each golf course until 08.02.2031, but the official decision of the Town Planning and Housing Department remains unknown until today, while these applications have not been subject to a joint AA and EIA procedure after January 2025.

The concerns are great considering the granted Planning Permits and that an investor might buy at any time the licences and proceed with the development. With everything ready for development, the significant ecological value, conservation targets and integrity of the area is still in imminent threat. It is stressed that the European Commission has decided to re-include *Limni Bay Project* in the ongoing infringement procedure (**Ref. 2019/2303**) on the inadequate AA of several plans and projects in Cyprus, in the framework of the Reasoned Opinion sent recently, on 13.03.2024.

It is noted that the *Chrysochou Bay Local Development Plan* has been adopted in 2015, amended in 2021 and approved in 2024, without being subject to a joint SEA and AA procedure, to ensure that its provisions, policy measures and planning zones will not affect the conservation targets and the integrity of the nesting habitats of marine turtles (**Rec. 13**) and the Natura 2000 site Periochi Polis – Gialia (CY4000001).

In this framework, we firmly believe and strongly encourage the Bureau to bring the open casefile for discussion at the Standing Committee this December. Thank you for your cooperation and we remain at your disposal for any further information and/or clarification.

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