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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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

Bureau of the Standing Committee
7-9 April 2026
Strasbourg

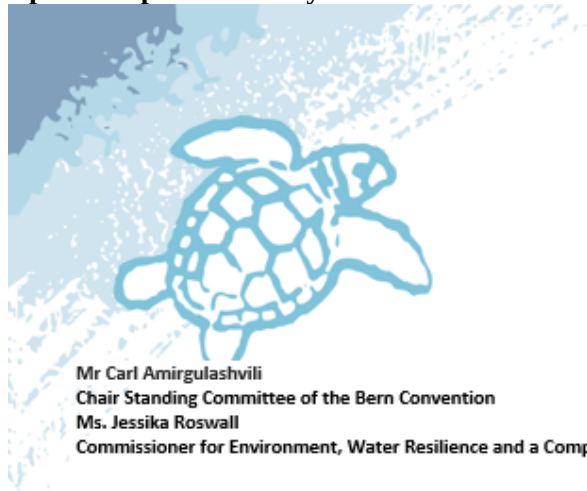
Open File: 2010/05

Threats to marine turtles in Thines Kiparissias (Greece)

-COMPLAINANT REPORT-

Documents prepared by MEDASSET

Update Report February 2026



MEDASSET

Mediterranean Association
to Save the Sea Turtles

Licavitiou 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

10 February 2026

Our Ref. 06.2026

Re: Update in relation to Open File 2010/05: Greece: Threats to marine turtles in Thines Kioarissias

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

Dear Mr. Amirgulashvili, Dear Commissioner Roswall,
MEDASSET, in collaboration with ARCHELON and WWF Greece, hereby submits an update regarding **Open File 2010/05 (Greece: Threats to marine turtles in Thines Kioarissias)**. We request that this information be tabled for discussion at the upcoming Spring 2026 Bureau meeting.

I. Concerns Regarding the Special Environmental Studies (SES) Following the public consultation (concluded September 22, 2025) and the subsequent adoption of the Special Environmental Studies (SES) on 30 December 2025, we must highlight that critical management issues remain unresolved.

While the SES for the Ionian National Marine Park intends to incorporate terrestrial parts of *Natura 2000* sites hosting *Caretta caretta* nesting beaches, the current mapping and documentation fail to ensure unified protection. Specifically:

1. **Fragmentation:** Terrestrial sections are included fragmentally. It remains unclear which areas fall under the current SES and which are subject to other SES mandates, leading to significant information gaps.
2. **Conflicting Regimes:** There is a high risk of conflicting regulations and permitted uses on the same nesting beaches due to overlapping management regimes (Ionian NMP, Natura 2000, and external SESs).
3. **Administrative Ambiguity:** The administrative status of Kyparissia Bay remains undefined. It is unclear whether a single management unit will be established or if parallel—and potentially competing—jurisdictions will apply.
4. **Coherence Gap:** The current mapping undermines the consistent protection of nesting beaches, migratory corridors, and megafauna conservation measures.

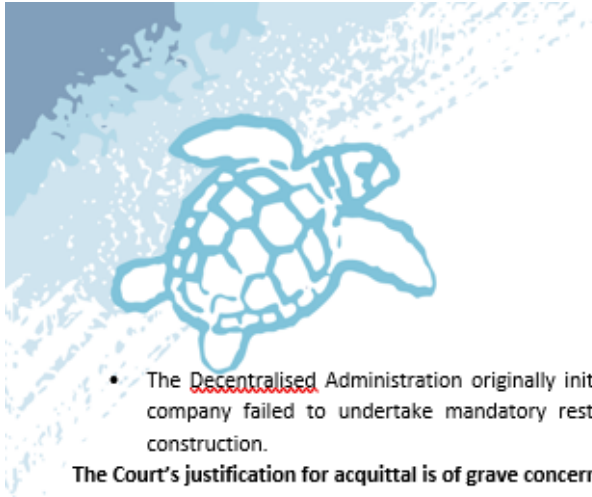
II. Judicial Developments and Enforcement Gaps Recent judicial rulings have further exposed the lack of effective accountability and the failure to enforce Presidential Decrees.

Regarding the five illegal roads constructed by the real estate company **NEOS KOTINOS S.A.** (referenced in Recommendation No. 174/2014):

- On 3 February 2026, the Three-Member Misdemeanor Court of Appeal in Kalamata acquitted the legal representative of NEOS KOTINOS S.A. of the criminal offense of environmental degradation.

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



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- The Decentralised Administration originally initiated the proceedings and Regional Authorities after the company failed to undertake mandatory restoration measures for the damage caused by the road construction.

The Court's justification for acquittal is of grave concern:

1. It reasoned that because an increase in *Caretta caretta* nests was observed, environmental degradation could not be established.
2. It deemed the illegal roads to be "public-use roads," thereby absolving the company of restoration responsibility.

This ruling effectively disconnects **documented habitat degradation** from **legal responsibility**, undermining the "polluter pays" principle and the obligation to restore strictly protected nesting areas.

III. Conclusion and Call to Action No tangible progress has been made toward addressing the violations cited in Recommendation No. 174. Illegal constructions, road development, and sand dune destruction persist alongside threats from hydrocarbon exploration. While seasonal pressures (camping/beach furniture) subside in winter, the fundamental infrastructure threats remain unaddressed.

We respectfully encourage the Bern Convention Standing Committee to:

- Consider this update during the 1st Bureau meeting of 2026.

We respectfully urge the European Commission to:

- Attend the on-the-spot appraisal in Kyparissia Bay.
- Urge Greek authorities to conform with national and EU legislation.

We remain at your disposal for any further information.

Yours sincerely,

Lily Venizelos

MEDASSET President

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

CC:

Bern Convention, Council of Europe:

Ms. Alessandra SIINO, Secretary of the Bern Convention

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

Ms. Marta MEDLINSKA, Programme Manager

European Commission, Directorate-General for Environment:

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

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

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

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

Ms. Florika FINK HOOIJER, Director-General for Environment

Mr. Andrea VETTORI, Head of Unit Nature Conservation

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