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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
22-24 September 2026
Strasbourg

Open File: 2010/05

Threats to marine turtles in Thines Kiparissias (Greece)

-COMPLAINANT REPORT-

Documents prepared by MEDASSET

Update for the Autumn Bureau Meeting**31 July 2026****UPDATE REPORT BY THE NGO****Marine Turtle Conservation in the Mediterranean****LOGGERHEAD SEA TURTLE (*CARETTA CARETTA*) CONSERVATION
MONITORING IN KYPARISSIA BAY, SOUTHERN KYPARISSIA
(WESTERN PELOPONNESE, GREECE)**

Document presented by

MEDASSET - the Mediterranean Association to Save the Sea Turtles**for the 46th 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 3rd Bureau Meeting of the Bern Convention (22-24 September 2026 Strasbourg) on the conservation status of sea turtle nesting beaches in Kyparissia Bay, Greece. The report was made possible by a grant from Aktionsgemeinschaft Artenschutz (AGA), www.aga-artenschutz.de.

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SUMMARY

During our assessment in June 2026, we verified that the conservation status of Kyparissia Bay remains unsatisfactory, with no substantial improvement in compliance with the measures of Recommendation No. 174 (2014). The threats identified in previous reports persist, while new disturbances further demonstrate the lack of effective implementation and enforcement of the existing legal framework. Recorded threats included the continued construction of illegal buildings along the protected coastline, the continued planting and expansion of alien plant species on the nesting beaches, degradation of the sand dune ecosystem, unrestricted vehicular access to the nesting beaches through an expanding network of illegal roads, extensive illegal camping, inadequate beach furniture management, light pollution, and fishing activities. During this year's assessment, heavy machinery was documented operating directly on the core-nesting beach during the installation of beach bar infrastructure, while illegal wooden

walkways, platforms and other recreational facilities remained in place within the core nesting area despite existing demolition protocols. These activities resulted in vehicles driving across nesting habitat in close proximity to sea turtle nests. Furthermore, the Greek Government continued to promote offshore hydrocarbon exploration in the Ionian Sea, constituting an additional potential cumulative pressure on marine protected areas. Ten years after the judgment of the Court of Justice of the European Union, twelve years after the Bern Convention adopted Recommendation No. 174 (2014), and eight years after the Presidential Decree entered into force, the site remains inadequately protected. The measures of Recommendation No. 174 are either not implemented or only partially implemented.

MEDASSET calls upon the authorities to:

- Safeguard and enforce implementation of the Presidential Decree (PD) regulations
- Urgently issue and implement a Management Plan in collaboration with the Protected Areas Management Unit, which will also cover unresolved issues not addressed in the PD (e.g. fishing activities and nighttime beach use and operation of beach bars)
- Impose fines and penalties in order to stop illegal activities and restore the habitat especially the sand dune habitats, which are degraded year by year
- Keep the Standing Committee informed about progress in the implementation of the above Recommendations

MEDASSET calls upon the Bern Convention Standing Committee to:

- Encourage authorities to provide further information to the Standing Committee, as requested above
- Urge authorities to implement Recommendation No.174 (2014)
- Discuss the case file at the 3rd Bureau Meeting and the 46th Meeting of the Standing Committee
- Bring the issue to the European Commission as part of the infringement process for noncompliance with CJEU's judgment C-504/14.
- Conduct an On the Spot Appraisal (OSA), as was requested to the Greek authorities and denied in 2026.

DETAILED UPDATE

Our assessment took place on the 29th of June and the 1st of July 2026. MEDASSET's experts carried out an assessment on the conservation status of the core nesting area of Kyparissia Bay, a 10km length of the nesting beach between the rivers of Arkadikos to the south and Neda to the north. The following presents the survey findings in relation to each of the measures under Recommendation No.174 (2014). All photos were taken by MEDASSET unless stated otherwise.

1. Consider giving the key nesting areas for sea turtle an appropriate protection status that may ensure the long-time conservation of their high natural values, including sea turtle nesting beaches, dunes systems, coastal forests, marine habitats and others

The PD designates the nesting beach as a Nature Protected Area and not as a National Park, the latter providing the highest level of protection. For Nature Protected Areas, all adjacent areas that are not within the boundaries are designated as Agricultural Landscape Zones, in which construction is permitted. Part of the coastal area directly behind the core-nesting beach, in particular Kalo Nero, is designated as an Agricultural Landscape Zone and has

suffered extensive coastal developments placing the reproduction of sea turtles in extreme danger.

2. Permanently restrict or prohibit as appropriate, based on an appropriate assessment, the construction of any villas or other buildings, new roads or other infrastructure, in the key areas where construction licenses have been suspended by decree, thus preserving the present natural state of those areas

Because of the failure to enforce the PD, there has been no suspension of construction or demolition of the existing constructions directly behind the core nesting area. Hence, due to its lack of enforcement, the PD fails to adequately protect and preserve the habitat. No buffer zone exists between the construction and nesting areas, despite requests by ARCHELON, MEDASSET and the 'Nature 2000' National Committee. Furthermore, while the PD addresses the need to remove the existing illegal road network, there has been no action for its removal. This illegal road network gives direct access to the nesting beach and leads to the continuous degradation of the site and the protected sand dune ecosystems. No action has been taken for the demolition of the illegal road system perpendicular to the shoreline or the restoration of the area, on the contrary, we witnessed new ones this year, hence no steps are taken to stop the creation of new roads (**Fig. 1**). The Greek Ministry of Environment and Energy through the corresponding Coordination Office for the Implementation of Environmental Liability (COIEL, known in Greek with the acronym SYGAPEZ), placed some blockades in June 2021, at the entrance to the existing five illegal roads constructed by the KOTINOS real estate company. Nevertheless, it was an unsuccessful step to protect the area as the barriers are not actually blocking the access to the beach and the vehicles can drive around them to access the high-density sensitive nesting areas (**Fig. 1**).

3. Restore the original sand dune and forest habitat in the above-mentioned area by demolishing any illegal road built perpendicularly to the shoreline, as well as other existing illegal artificial infrastructure; put immediately effective measures in place to prevent cars and caravans from reaching the proximity of the nesting beaches and produce nuisance to sea turtle nesting and hatching

We emphasize that no effective measures are in place to prevent cars and caravans from reaching the proximity of the nesting beaches, causing disturbances to sea turtle nesting activity and emerging hatchlings (**Fig. 2**). Furthermore, camping is extensive throughout the protected forest habitat that borders the dunes and nesting beach and the authorities do nothing to prevent it. We recorded 16 caravans camping directly behind the core nesting area, with numerous additional tents and extensive camp setups including tables, chairs, cat shelters, and other semi-permanent structures. One caravan had installed solar panels, indicating an intention for prolonged or indefinite occupation of the site (**Fig. 3a**). The core cause for the above threats is that the PD does not include a map of the legal road network, therefore allowing the constant creation of new illegal roads to access the beach and to support illegal camping. The Management Plan must address these important issues. Furthermore, in late June and early July 2026, the Management Unit of Strofylia Wetlands National Park and Protected Areas of Western Peloponnese, implemented a pilot dune restoration action between Agiannakis and Elaia in an attempt to protect the sand dune ecosystem. Following a complaint submitted by a local volunteer group alleging that a *Testudo hermanni* individual had died after becoming trapped in the temporary dune restoration fencing, the Management Unit replied that the fencing installation was a pilot application, that modifications to the restoration technique were subsequently requested, and that the available evidence did not support the conclusion that the tortoise had died as a result of entrapment in the fence (**Fig. 3b**).

4. Ensure that owners of the houses that have already been built in sensitive areas in the vicinity of the core nesting area, avoid changing the profile of the dune, and control that the communities and geomorphological dynamics; ensure that existing houses change or shade the lights illuminating the beach causing photo-pollution affecting negatively sea turtle nesting and hatching; remove invasive alien plants already planted in some of those areas (for instance *Carpobrotus*) as they may spread into dune and beach nesting areas making them inappropriate for sea turtle nesting

As stated in the PD, the sand dune ecosystem around the existing houses must be restored. However, introduced alien plants have not been removed and there has been no effort to reinstate the previous dune ecosystem where houses have been built within the vicinity of nesting areas. In addition, the homeowners in order to set the borders for their gardens plant new alien species. (Fig. 8). Cultivation of the flora continues to maintain these alien species and prevents restoration of the natural sand dune ecosystem. The invasive species *Carpobrotus* sp. can be found along the shore, encroaching onto the nesting area of the beach from Kalo Nero to Vounaki (Fig. 4).

5. Avoid any agriculture in the public domain and restore dunes to their original natural state

No action has been taken to enforce the specifications of the PD and thus the cultivation of watermelons continues extensively across the sand dune area, especially in the Vounaki area. (Fig. 5)

6. Address in the whole Natura 2000 site the problem of photo-pollution, particularly in Kalo Nero; all lights should be shaded in a way to avoid illuminating the beach and dune areas

Light pollution is still a severe unresolved problem, in particular in Kalo Nero, posing a serious threat of disorientation to the emerging hatchlings in this and in many other locations across the nesting beach (Fig. 6).

7. Ensures that the beach's equipment used now in the Natura 2000 site is removed at night or stored in a way that reduces the area occupied on the beach; prohibits/ does not give any licenses to any new beach equipment so that core nesting area remain free of obstacles for nesting turtles

Beach furniture used at Kalo Nero nesting beach, in a zone of approximately 1.2 km length, were not removed at night during our assessment, despite the relevant provisions of the PD Agiannakis core nesting area, (Fig 7 a–h). A beach bar was operating within the core nesting area. Heavy machinery (white circle) was observed driving directly across the nesting beach during beach bar installation. Vehicle and tractor tracks (red lines) extended across the sand, while sea turtle nests (red circles) were located within the trafficked area. A shower installed on the nesting beach is indicated by the yellow circle at t Kalo Nero core nesting area, (Fig. 7 i–o). An illegal shower (green circle) and wooden walkways (red lines) installed by local businesses remained in place, providing direct access across the nesting beach. Sea turtle nests (red circles) were located immediately adjacent to and in front of the beach furniture and between the wooden walkways, demonstrating the absence of effective beach management measures to protect nesting habitat.

8. Prohibit any sand and gravel extraction or any new structures in the sea (breakwaters, etc.)

During this year's assessment, sand and gravel extraction was not observed.

9. If new housing is to be built to accommodate growing tourism, favor building in areas already urbanized (such as Kyparissia town) avoiding delivering building licenses in pristine natural areas within the Natura 2000 site, independently from the ecologically friendly characteristics of the new buildings

The Measure is only partially addressed. The PD fails to adequately protect the nesting habitat especially at Kalo Nero, directly behind the core nesting area, where building is permitted. Newly constructed houses (completed during 2021) were observed at Vounaki and Agiannakis (**Fig. 8**). Inquiries with the local authorities asking if the construction is in accordance with legal building permits have been made since 2019; to date no reply has been given from the authorities.

10. Consider regulating the navigation of vessels in the marine part of the Natura 2000 site GR 2550005 during the nesting and hatching season (April to October) so as to avoid the killing of turtles by boats; assess existing fishing practices and prohibit those that may negatively affect nesting and mating turtles, as some are likely to be drowned in fishing nets

Fishing activities are considered the highest threat to sea turtles today and the only maritime restrictions stated in the PD relate to vessel speed limit (maximum six knots) within one mile of the shoreline and a time limitation on recreational fishing, which is only permitted during the day. Currently there is no enforcement of the six-knot speed limit and prohibited nighttime recreational fishing activities. Fishers are still permitted to set their nets in the nearshore waters in close proximity to the nesting beach, which presents an extremely high risk of incidental capture of breeding adult turtles and hatchlings. Recreational fishing from the beach during nighttime, takes place on a regular basis, especially in the areas of Kalo Nero across the whole core nesting area, Vounaki, Agiannakis and Elaia, both at day and night time. On the 29th we observed fishing ashore of Kalo Nero (**Fig. 10**).

11. Enforce measures aimed at avoiding people and cars visiting the sea turtle nesting beaches at night, particularly from the camping sites; control feral dogs as they have proved to attack and hurt many nesting sea turtles

No restrictions were included in the PD to prohibit or reduce human presence on the beach at night, but as stated by the Ministry of Environment, these issues should be addressed within the Management Plan, which is yet to be developed. Currently there is a complete absence of measures preventing people and cars from accessing the beach at night. There are no notices or signs informing visitors that this is a protected sea turtle nesting beach and should not be accessed at night, in order to prevent disturbances. Beach equipment on the turtle tracks/paths for their nesting activity at Agiannakis core nesting area as well as horse riding tours advertised and horse droppings were found on the road leading to Elaia nesting beach and on the nesting beach (**Fig. 9**). As a result, of all the above, the nesting areas are subjected to high levels of disturbance during the crucial nighttime nesting period. Traditional festivals with loud music are held annually at Giannitsochori and at Kalo Nero in early August, in both cases just behind the nesting beach.

No attacks on the nests by feral dogs have been recorded this year.

12. Keep the Standing Committee regularly informed about the progress in the implementation of this Recommendation

MEDASSET is in frequent contact with the Secretariat, updates the Secretariat in due time for any developments in the area before every Bureau Meeting and every Standing

Committee Meeting with detailed reports and letters, prepares responding letters to Greek and EU authorities correspondingly.

Observations on other activities and impacts:

- Significant delays persist in the completion and implementation of the legal framework governing Natura 2000 sites in Greece. In particular, the long-awaited Management Plan for the Kyparissia Bay protected area has still not been adopted, despite its critical role in regulating activities that remain insufficiently addressed by the Presidential Decree, including beach management, night-time beach use, fishing activities, and visitor management.
- During 2026, Greece advanced the establishment of its National Marine Parks. Following the completion and approval of the Special Environmental Studies (SES), the Presidential Decree establishing the National Marine Park of the Southern Aegean (Southern Cyclades) was signed on July 15, 2026 without a consultation process as defined the law, while the designation process for the proposed National Marine Park of the Ionian Sea remains pending. The effectiveness of these initiatives will depend on the adoption of the remaining legal instruments, including the relevant Management Plans, and the effective implementation and enforcement of the proposed conservation measures.
- At the same time, the Greek Government continued to actively promote offshore hydrocarbon exploration as a strategic national priority. During 2026, the Ministry of Environment and Energy approved the completion of Chevron's farm-in agreement with HELLENiQ Energy, launched new licensing procedures for the acquisition and processing of non-exclusive seismic data in western and southern Greece, and held a series of high-level meetings with Chevron and ExxonMobil regarding offshore exploration in the Ionian Sea, including the forthcoming drilling programme in Block 2 and Chevron's participation in Block 10. Although no new exploration licence or drilling activity has been specifically announced for the waters adjacent to Kyparissia Bay, these developments demonstrate the Government's continued commitment to expanding offshore hydrocarbon exploration in the Ionian Sea. This broader policy context should be considered when assessing cumulative pressures on ecologically sensitive marine ecosystems and Natura 2000 sites in western Greece.

ANNEX: BACKGROUND

For a full description of the site and of the case background see [Update Report](#).

Kyparissia Bay, a NATURA 2000 site, is located in Greece, on the Western Peloponnese coastline. It has a high ecological value due to the presence of an extensive dune ecosystem and the fact that it constitutes one of the most significant nesting sites of the *Caretta caretta* turtle in the Mediterranean Sea, an endangered species as listed in the 92/43/EOK Directive, in need of strict protection (annexes II and IV). Approximately 82% of the nesting activity at Kyparissia Bay occurs in the 10km stretch of beach between the estuaries of the rivers Neda and Arkadikos. For reference, there were approximately 1.452 nests in 2013, 1.286 in 2014, 1.472 in 2015, 2.702 in 2016, 2.650 in 2017, 2.550 in 2018, 2.850 nests in 2019, over 3800 nests in 2020, 3.200 in 2021, 2.770 in 2022, 5000 in 2023, 6.700 in 2024 and 5,200 in 2025 (as recorded by ARCHELON). It is important to note that in all the aforementioned years the number of nests exceed even those recorded in Zakynthos, which is officially the most important nesting site for *Caretta caretta* in the Mediterranean.

The developments threatening Kyparissia Bay were firstly reported by MEDASSET's complaint submitted on 22 August 2010, for the 30th Standing Committee Meeting of the Bern Convention. Since then, MEDASSET in collaboration with ARCHELON, WWF Hellas and other environmental NGOs, has been lobbying at regional, EU and national level, in order to establish an adequate legal framework for the protection of Kyparissia Bay and its habitats. Following the campaigns and annual reports of MEDASSET and ARCHELON, the Standing Committee of the Bern Convention unanimously adopted Recommendation No. 174 at its annual meeting on December 5, 2014, urging Greece to prevent habitat deterioration and ensure improved adequate protection of the Southern Kyparissia Bay. The 2014 Recommendation was issued pursuant to a report and appraisal by an international expert and concerns raised by NGOs (ARCHELON and MEDASSET) relating to the construction of roads, houses and marine structures near the nesting sites, as well as the risks posed by fishing practices, light pollution and human disturbance to the beach during the nesting and hatching season. In total, the Recommendation includes 12 measures for the protection and restoration of the site.

Since the adoption of Recommendation No. 174 on 2014, MEDASSET, in collaboration with ARCHELON and WWF Hellas, have presented annual reports to the Bern Convention of the continued degradation of the site and its inadequate management. While positive steps have been taken with the adoption of the Presidential Decree (PD) after Greece's condemnation of the Court of Justice of the European Union on 2016, its enforcement is yet to be fulfilled. The strict enforcement of the Presidential Decree and the preparation and implementation of a Management Plan, which also considers the local community's needs and assistance is of utmost importance, has already been delayed by 8 years, with no foreseen timeframe for its preparation and implementation.

REPORTS & COMPLAINT SUBMITTED TO THE BERN CONVENTION

Available online at www.medasset.org or www.coe.int

T-PVS/Files (2025) 1995-06_comp: Open file: 2010/05 Threats to Marine Turtles in Thines Kiparissias (Greece). 14pp

T-PVS/Files (2023)46. MEDASSET. Update Report. Threats to marine turtles in Thines Kiparissias (Greece). 20pp

T-PVS/Files (2022)56. MEDASSET. Update Report. Threats to marine turtles in Thines Kiparissias (Greece). 21pp

T-PVS/Files (2021)32. MEDASSET. Update Report. Threats to marine turtles in Thines Kiparissias (Greece). 4pp

T-PVS/Files (2020)56. MEDASSET. Update Report. Threats to Marine Turtles in Thines Kiparissias (Greece). 23pp

T-PVS/Files (2019)28. MEDASSET. Update Report. Development Plans in Kyparissia Bay, Southern Kyparissia (Western Peloponnese, Greece). 15pp

T-PVS/Files (2018) 48. MEDASSET. Update Report. Development Plans in Kyparissia Bay, Southern Kyparissia (Western Peloponnese, Greece). 5pp

T-PVS/Files (2017) 30. MEDASSET. Update Report. Development Plans in Kyparissia Bay, Southern Kyparissia (Western Peloponnese, Greece). 9pp

T-PVS/Files (2016) 34. MEDASSET. Update Report. Development Plans in Kyparissia Bay, Southern Kyparissia (Western Peloponnese, Greece). 12pp

T-PVS/Files (2015) 29. MEDASSET. Development plans in Southern Kyparissia Bay, Southern Kyparissia (NATURA 2000-GR2550005 Western Peloponnese, Greece). 7pp

T-PVS/Files (2014) 48. MEDASSET. Update Report. Development Plans in Kyparissia Bay, Southern Kyparissia (Western Peloponnese, Greece). 8pp

T-PVS/Files (2013) 15. MEDASSET. Update Report on Development Plans in Kyparissia Bay, Southern Kyparissia (Western Peloponnese, Greece).14pp

T-PVS/Files (2012) 25. MEDASSET. Update Report. Development Plans in Kyparissia Bay, Southern Kyparissia (Western Peloponnese, Greece). 3pp

MEDASSET. 2011. Update Report on Development plans in Kyparissia Bay, S. Kyparissia (W. Peloponnese, Greece). 9pp

MEDASSET. 2010. Complaint to the Bern Convention regarding uncontrolled development in Southern Kyparissia Bay (Greece). Prepared by L. Venizelos. 26pp

ANNEX: PHOTOGRAPHS







Fig. 1 | Core nesting area, Agiannakis to Elaia, 29th June 2026. The five illegal roads are not restored yet. Blockades placed by the Ministry of Environment and Energy fail to prevent vehicles accessing the beach, vehicles can easily bypass the barriers, as seen in the photos.



Fig. 2 | Kalo Nero core nesting area 29th June 2026. Caravan parked for camping directly behind the core nesting area. No management measures exist to prevent cars and caravans parking in close proximity to the nesting beach.













Fig. 3a | Core nesting area between Agiannakis and Elaia village, 29 June 2026. We recorded 16 caravans camping directly behind the core nesting area, with additional numerous tents and extensive camp setups including tables, chairs, cat shelters, and other semi-permanent structures. At least one caravan had installed solar panels, indicating an intention for prolonged or indefinite occupation of the site.



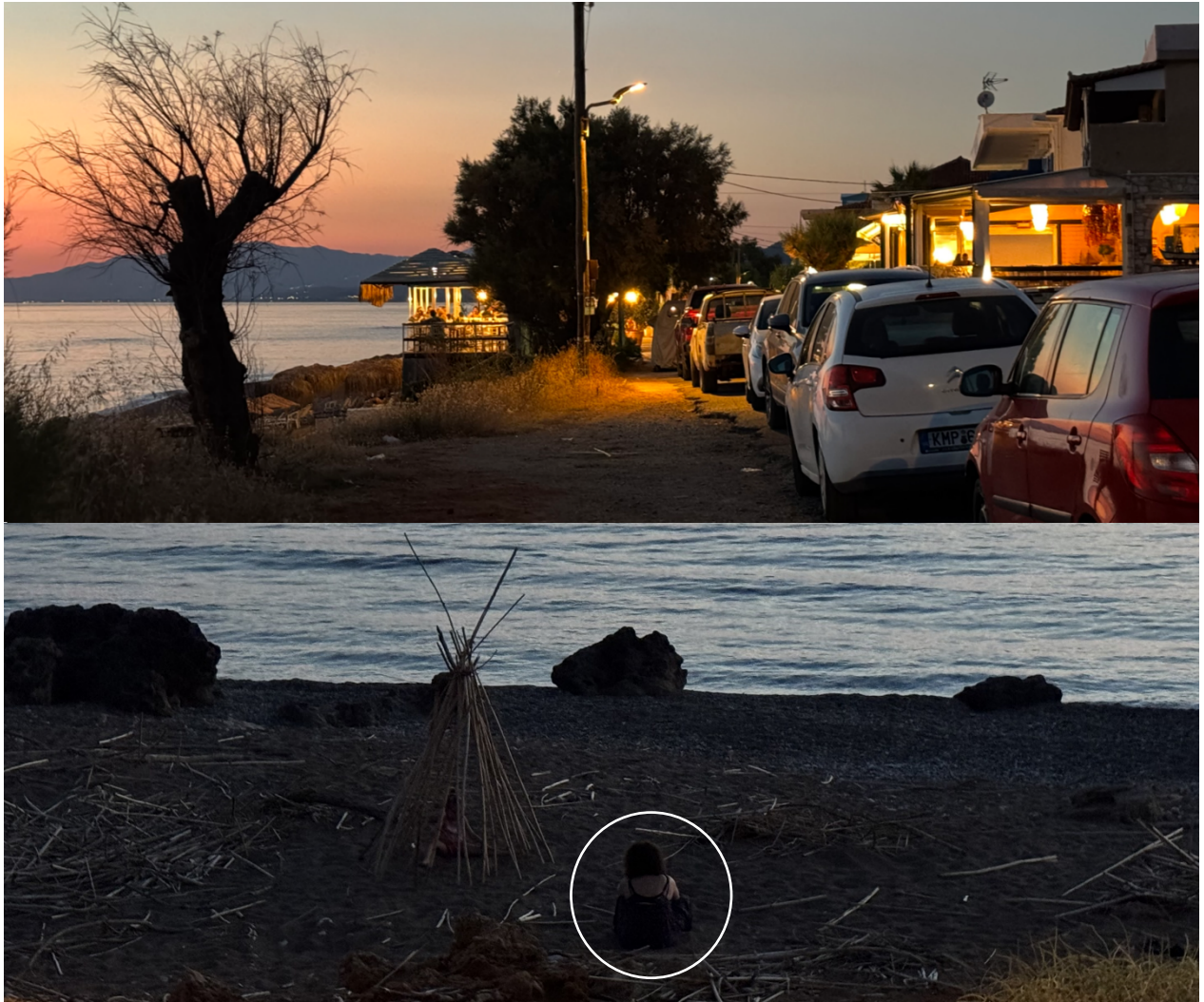
Fig. 3b | Temporary fencing installed as part of a pilot dune restoration action between Agiannakis and Elaia, June–July 2026.



Fig. 4 | Kalo Nero, 29th June 2026. Cultivation of invasive species *Carpobrotus sp.* encroaching onto the nesting area (red circle) of the beach from Kalo Nero to Vounaki.



Fig. 5 | Behind the core nesting areas of Vounaki and Agiannaki, 29th June 2026. Sand dune destruction due to agricultural use; ongoing watermelon cultivation.





ARCHELON





Fig. 6 | Kalo Nero core nesting area, 29th June 2026 two top photos and 3rd July 2026 four bottom photos. Light pollution emitted from the beach bars/restaurants. Beach furniture not removed during the night, causing obstacles and limiting the availability of nesting space. Human presence in white circle.







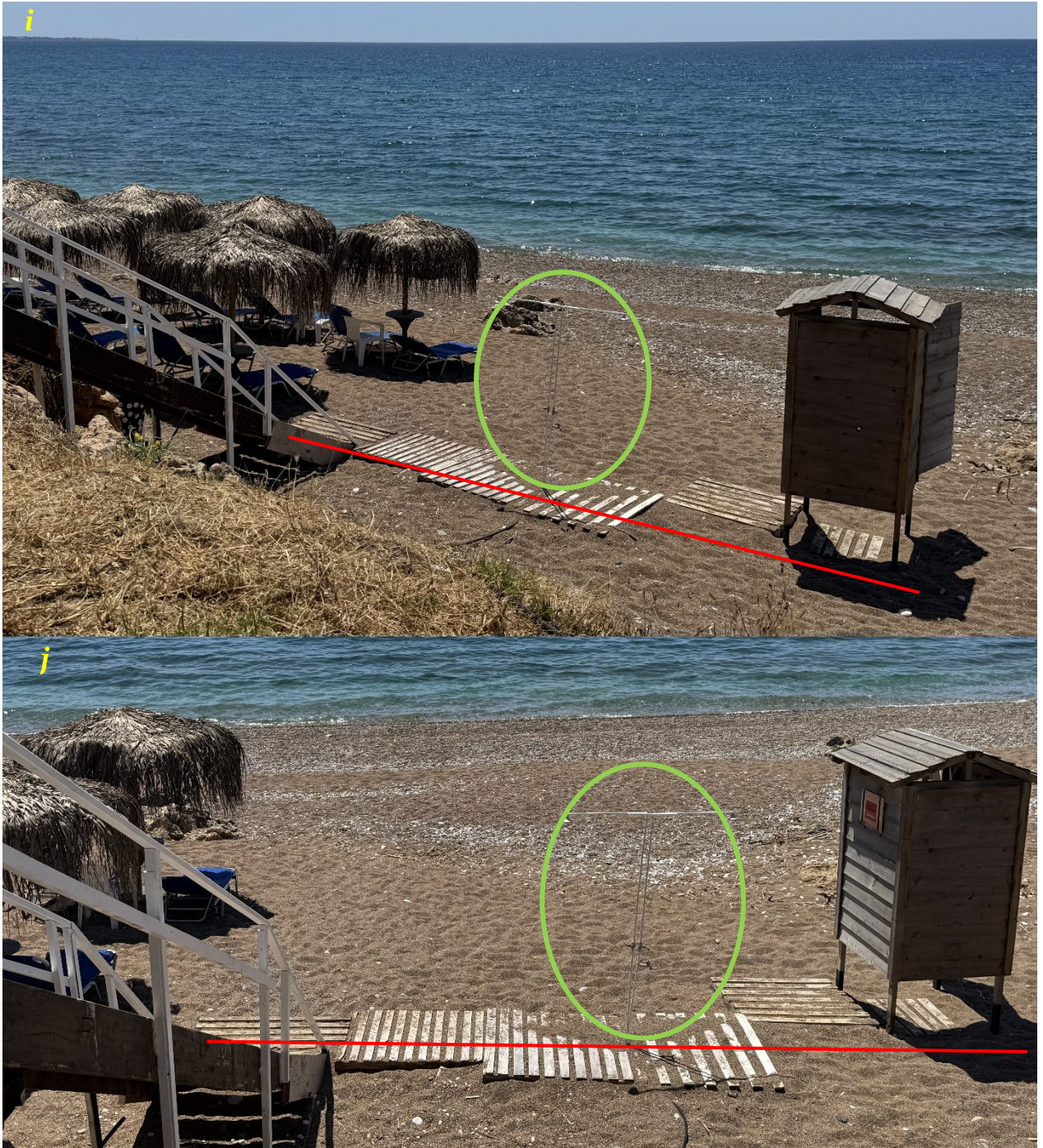






Fig. 7 | Agiannakis core nesting area, 29 June 2026. Photos a–h. A beach bar is operating within the core nesting area. Heavy machinery (white circle) was observed driving directly across the nesting beach during the beach bar installation. Vehicle and tractor tracks (red lines) extended across the sand, while sea turtle nests (red circles) were located within the trafficked area. A shower installed on the nesting beach is indicated by the yellow circle.

Kalo Nero core nesting area, 29 June 2026. Photos i–o. An illegal shower (green circle) and wooden walkways (red lines) installed by local businesses remained in place, providing direct access across the nesting beach. Sea turtle nests (red circles) were located immediately adjacent to and in front of the beach furniture and between the wooden walkways, demonstrating the absence of effective beach management measures to protect nesting habitat.



a + b



b











Fig. 8 | a, b Agiannakis; c, d Vounaki core nesting areas 29th June 2026. Drone footage 22nd July 2025. Houses constructed on the protected sand dunes, and alien plant species planted around the properties (red lines). Signs of heavy vehicle traffic in front of the houses, directly on the core nesting areas. Photos showing new ongoing constructions to the already illegal building (green arrows). Last photo is a drone image displaying illegal constructions c that are now almost finished (yellow circle), cultivation of non-indigenous species that work as boundaries for the constructions and vehicle tracks.



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Fig. 9 | Elaia core nesting area. 29th June 2026. A poster calling for horse riding at Elaia nesting beach (top) & horse manure (bottom). @archelon photos dated 26th May and 1st June 2026 correspondingly, show horse riding on the nesting beach between Agiannakis and Elaia.

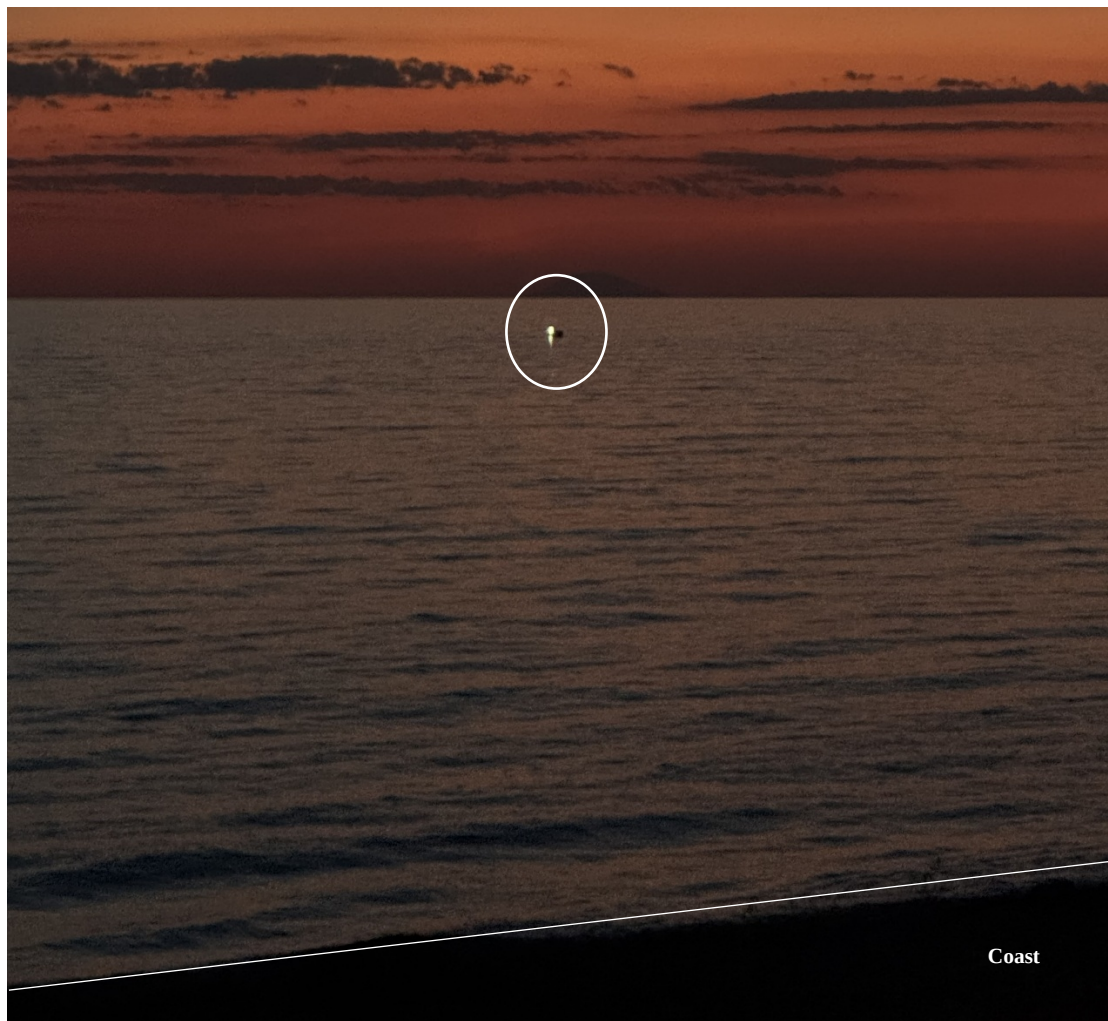
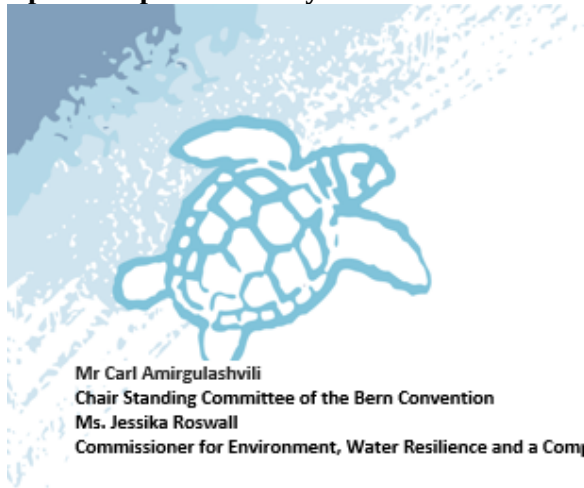


Fig. 10 | Kalo Nero core nesting area. 29th June 2026. Fishing activities are considered the highest threat to sea turtles.

Update Report February 2026



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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 Kiparissias

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 Kiparissias)**. 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.

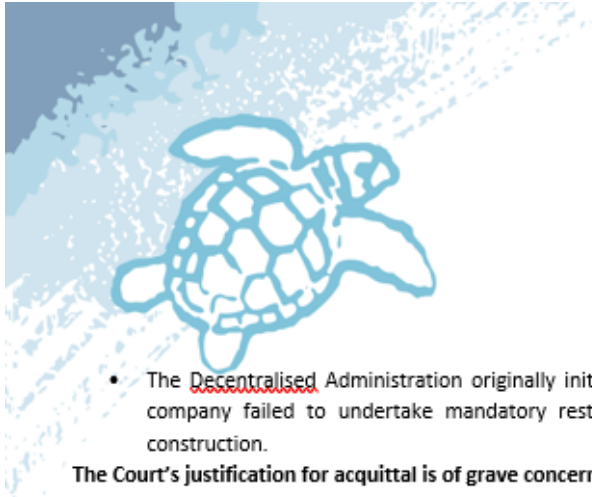
II. Judicial Developments and Enforcement Gaps Recent judicial rulings have further exposed the lack of effective accountability and the failure to enforce Presidential Decrees.

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.

Protecting marine biodiversity in the Mediterranean since 1988

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