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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

42nd meeting
Strasbourg, 28 November – 2 December 2022

Open file: 1986/08

**Recommendation No. 9 (1987) on the protection of
Caretta Caretta in Laganas bay, Zakynthos
(Greece)**

- REPORT BY THE COMPLAINANT -

*Document prepared by
MEDASSET*

08 August 2022

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

for the 42nd 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 second Bureau Meeting of the Bern Convention (September 2022) on the conservation status of sea turtle nesting beaches in Zakynthos, Laganas Bay, Greece.

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SUMMARY

During the 2022 assessment, we observed few improvements on some of the six protected nesting beaches, but these were not applied consistently nor throughout the whole of Zakynthos National Marine Park (ZNMP), in order to provide adequate protection. Illegal developments remain, even though the courts have declared them illegal and have ordered their demolition and the restoration of the environment many years ago. Beach wardens' presence on the nesting beaches was increased, but it is still insufficient for the effective enforcement of management measures. In many instances we observed that beach closure times were not being adhered to after sunset nor the presence to restricted areas on the nesting beaches. Cordoning of the nesting areas at the back of the beach were increased to four of the six nesting beaches. In the maritime area, not only were there no improvements observed but the conditions worsened significantly since our last report. Marine traffic remains extremely high, and we observed an alarming number of boats dangerously exceeding the Zakynthos National Marine Park's speed limit, with sea turtle fatalities recorded again from propeller strikes.

Regulations and management measures that apply within the ZNMP are either not enforced or are not enforced consistently and effectively. Thirty-five years since Recommendation No. 9 (1987) was adopted by the Bern Convention Standing Committee and 20 years since Greece was condemned by the European Court of Justice, the Government has yet to secure the nesting beaches in Laganas Bay against human pressure and development.

MEDASSET calls upon the authorities to:

- Increase and secure funding to the ZNMP and Management Unit, in particular for warden capacity for adequate protection of the nesting beaches and maritime area
- Develop an effective wardening system based on the active involvement and coordination of competent authorities and the strengthening and clear determination of enforcement competences
- Increase enforcement of the National and ZNMP regulations, especially within the maritime area
- Take action to cease illegal business operations in Daphne and restore the site to its natural state
- Impose appropriate fines and penalties to deter and prevent further and continued violations throughout the entire protected area.

MEDASSET calls upon the Bern Convention Standing Committee to:

- Discuss the case file at the 42nd Meeting of the Standing Committee
- Continue to follow-up with the Greek Government with Recommendation No 9, especially regarding Measure No 1 about Daphne and the progress of the implementation of the National Action Plan
- Perform an on-the-spot appraisal of Laganas Bay nesting beaches and maritime area, in order to update and amend Recommendation No 9 (1987)

DETAILED UPDATE

One of the most important Mediterranean's loggerhead nesting area, located in Laganas Bay at Zakynthos, consists of six discrete nesting beaches: East Laganas, Kalamaki, Sekania, Daphne, Gerakas and Marathonisi islet. The maritime area of Laganas Bay is divided into three zones with different protection levels (Fig. 1). See MEDASSET 2009 Update Report for a more detailed description of the site.

MEDASSET visited the Zakynthos National Marine Park (ZNMP) in July 2022 to assess and document the conservation status of the protected nesting beaches as well as the maritime area. It is important to note that, visitor numbers have to date increased dramatically compared to years with applied travel restrictions due to COVID pandemic, re-exerting tremendous pressure on the ZNMP (Fig 2). The following presents the survey findings in relation to measures under Recommendation No. 9 (1987), the enforcement of the ZNMP management measures and developments within the framework of National legislation. (All photos are taken by MEDASSET unless stated otherwise).

Survey observations on the implementation of Recommendation No. 9 (1987):

1. Remove the prefabricated houses in Dafni:

Thirty-five years since Rec. No. 9 was adopted, the illegal development and destruction of the protected sand dune system directly behind Daphne nesting beach has expanded and continued. Today, the natural sand dune system is completely destroyed and transformed from its natural state with illegal businesses of taverns and accommodation continuing to operate unhindered (Fig. 3). Additional touristic facilities presenting further risks to the turtle nesting activity also still exist on the land directly behind the nesting beach, consisting of 530 sunbeds placed on the introduced and maintained lawn, an alien plant species (Fig. 4) and showers, which water runoff flows onto the nesting beach (Fig. 5).

5. Remove trees and ban and penalise the use of deck chairs, sunshades and pedalos on the nesting beaches of Gerakas, Kalamaki, eastern Laganas and Marathonisi;

The legal limits for the maximum number of visitors allowed at one time, the number of sunbeds and umbrellas on the nesting beaches and the maximum number of boats allowed at Marathonisi are established in the protective management measures of ZNMP. Adherence and enforcement to these protective measures were overall not observed.

Maximum Visitor Numbers: Daphne's visitor count greatly exceeded the legal limit of a maximum of 100 visitors, with our surveyor counting 368 people present at 13.25pm on 14th July 2022. No management measures for maintaining safe distances of visitors from nests are present on Daphne, as observed on the other nesting beaches (cordoned areas with signage and ropes). Visitors are free to roam everywhere and in very close proximity to the caged nests on the protected nesting beach (Fig. 6). Number of visitors counted at Gerakas (480 at 14:30 14th July) and Marathonisi (237 persons at 11:15 14th July) also exceeded the maximum allowances of 350 and 200 respectively.

Maximum Umbrellas/ Sunbeds: Across Laganas East and Kalamaki nesting beaches the regulations permit a total of 150/ 300 umbrella/ sunbeds. Our surveyor counted 284/ 570 umbrellas/ sunbeds (Laganas: 240/ 430; Kalamaki: 70/ 140), a further increased from last year's report and a continuation of exceeding the specified limit. Furthermore, no sunbeds on Laganas East, Kalamaki and Gerakas were removed from the front of the beach, and only placed on their sides *in situ*. (Fig. 7). This continual failure to completely remove the sunbeds from the front of the beach and the increase in their numbers, reduces the available space for emerging females to reach suitable nesting areas at the back of the beach.

Maximum number of Boats at Marathonisi: A maximum number of 10 boats are allowed at Marathonisi at any time, our surveyor counted 14 professional and private hire boats anchored on the nesting beach at 10.20am

on 14th July 2022 (Fig. 8). Other private hire boats were observed anchored within Zone B of the maritime area; it is prohibited for any boat to anchor within Zone B (Fig. 9)

Illegal developments in other areas of the ZNMP

- The illegal developments that have occurred within the protected ZNMP boundaries remain. Two illegal buildings at Gerakas constructed in 2017, a stable (150m²) and a house (80m²) (see T-PVS/Files 2018 21) have not been demolished and the site has not been restored, despite the issue of fines by the competent authority.
- The competent authorities have taken no action to restore the saturated illegal landfill that operated within the ZNMP boundaries and the Natura 2000 site, despite its closure since December 2017.
- The restoration of the illegally constructed road between Daphne and Gerakas (Dec. 2015) within the ZNMP and partially within the NATURA 2000 site, has still not been carried out. The initial fine and order of restoration issued by the competent authorities in 2016, was minor and proved insufficient for deterring the perpetrator, who expanded the network in March and April 2018. An additional larger fine (200.000 euros) was issued (August 2018), and failed to deter the perpetrator/land owner, who was observed continuing works in January 2021 (see MEDASSET letter dated 26 Feb 2021). In April 2022, the decision for the imposition of the fine was reversed following an administrative appeal by the land owner, and the fine was reduced to 10.000 euros. MEDASSET and WWF Greece lodged an administrative recourse against the validity of this decision and notified NECCA of this action. The competent authorities (Decentralised authority) are expected to decide on the outcome of this process in September 2022. Alternative proactive measures are available to the Greek Ministry to ensure the restoration of the site, but have not been applied. The Coordination Office for the Implementation of Environmental Liability (COIEL, known in Greek with the acronym SYGAPEZ) issued in August 2018 its decision in accordance to Directive 2004/35/EC, for which the perpetrator is legally obliged to restore the whole area with his own expenses.

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

- There are nine warden huts located across the six nesting beaches to accommodate 24hr warden protection, and even though more wardens were observed during the 2022 survey, their presence was still limited and not consistently applied across all nesting beaches. This is mainly due to lack financial and human resources in the Management Unit of the NMPZ and the unclear framework for wardening programmes due to the transition from the Management Body to NECCA's management unit. At sunset, two wardens were observed actively removing people from Laganas nesting beach at two entrances (Zante Beach Hotel and Kalamaki Beach Taverna) and one at Gerakas beach. However, the warden at Gerakas beach did not remain after removing everyone from the beach at 20:58, and consequently visitors were observed entering the nesting beach after sunset at 21:39 (Fig. 10). Of most concern, no warden was observed at Kalamaki nesting beach during the day or night. The absence of a warden at night meant that visitors were freely accessing the beach after sunset and remained on the beach when it was dark. In total 11 persons were seen walking along the beach after sunset (21:50 to 23.35), some using bright torches on the beach (Fig. 11). The presence of visitors on the nesting beaches after sunset, poses a great risk to nesting activity, as the disturbance can prevent females from emerging onto the beach, or abandon their nesting attempt. Throughout these observations, a small vessel light was observed almost stationary along the northern coastline of Pelouzo, presumed fishing.
- During the day, a warden was observed on Marathonisi, but no enforcement for the management measure of maximum number of boats allowed at one time around the beach was observed (Fig. 12). One warden was also observed patrolling along Laganas East, actively removing any persons at the back of the beach, however, a lack of increased wardening along the whole of the 3.5km nesting beach resulted in other violations being recorded; wetting of the sand on the nesting beach to cool for visitors, moving of protective nest cage for use as a clothes hanger (Fig. 13).
- The cordoned roped areas to zone the nesting areas at the back of the beach were present at Kalamaki, Marathonisi, Gerakas and new for 2022 along most of Laganas East. This management greatly assists preventing people accessing the nesting areas, however, it was not maintained, most notably around Zante Beach Hotel, where the rope was broken, and children observed playing at the back of the beach. Furthermore, in areas which were not cordoned people were observed at the back of the beach and in close proximity to the caged nests (Fig. 14).

- Horse riding on the nesting beaches and on the protected sand dunes are strictly prohibited, due to the negative impacts this activity has on the incubation of nests and destruction of the sand dune habitat. Horse riding as an ecotourism activity continues to be observed unhindered throughout the ZNMP, on the protected sand dune system at the back of Laganas East (Fig. 15) and on Vrondonero Beach, a small beach next to Kalamaki (east), within the boundary of the park that supports turtle nesting.
- Turtle Spotting regulations were not observed with up to five boats and swimmers observed encircling a turtle, when only two boats are allowed at one time, for up to 10mins at a maximum distance of 15m. The turtles are seriously disturbed and distressed by these activities. Non-compliance with these regulations is a common occurrence during the summer months. No enforcement actions have been taken to prevent the serious disturbance of marine turtles by turtle spotting activities leading to a sense of impunity and continuation (and even increase) of infringement incidents. (Fig. 16)
- It is still very apparent that there is a complete disregard of the protective management measures within the maritime activity within the Bay. Of great concern is the continuation of non-compliance to the 6 knot speed limit to the safety of the nesting population within the ZNMP. Numerous boats were observed greatly exceeding the speed limit (Fig. 17), and as recorded with one boat tour operator, up to 17knots. Furthermore, changes to the maximum horsepower allowed for private hire boats made by the Port of Zakynthos (from 10hp to 30hp) has increased the potential high speeds that boats can reach. Since the beginning of ARCHELON's monitoring programme (5/5/2022) five incidences of sea turtles strandings with propeller strike injuries have been recorded; one within the boundary of the NMP in Zone C between Cameo and Porto Koukla, and the others outside the boundary. Two of the turtles were still alive and transferred to ARCHELON's Rescue centre, where one did not survive.

Observations on other activities and impacts:

In March 2022, following the enactment of Law 4685/2020 in 2020 which radically changed the PA governance system in Greece, the Management Body of the NMPZ was abolished and was replaced by a management unit which constitutes a department of the newly established central PA management body (National Environmental and Climate Change Agency). This change has seriously impacted the day-to-day operation and management of the NMPZ. Lack of resources (human and financial), the highly bureaucratic processes, and the direct administrative dependence of the management unit on NECCA for all kind of decisions affecting the management of the NMPZ have led to various problems and management gaps in the field, especially related to the implementation of conservation measures and the wardening of the area.

The current ongoing project for the Special Environmental Studies for developing presidential decrees and management plans for all Natura 2000 sites in Greece is burdened with delays and implementation problems. There are serious concerns about the process and the expected outcomes and is particularly worrying for Zakynthos since there is uncertainty about the timeframe for the long overdue management plan, but also the much-needed amendments of certain provision of the presidential decree.

Following a very short period of public consultation, the Ministry of Environment and Energy introduced to Parliament (July 2022) a bill, in which it allowed for harmful land uses in the protection zones, excluded certain areas from the scope of the protected regime and allowed for the continuation of existing projects and activities regardless of the ecological needs of protected habitats and species. Following strong protests by environmental organisations and citizens and calls for the withdrawal of these provisions, the Minister of Environment announced in Parliament their temporary withdrawal. Given that the expressed intention of the Ministry is to conduct further consultations with stakeholders and introduce a revised bill probably by end of August, there are still concerns about the willingness of the Ministry to proceed with strengthening, and not undermining, the legal framework for the protection of Natura sites in Greece. Environmental organisations have asked that the Ministry proceeds promptly and effectively with the process for the adoption of conservation measures including management plans for all protected areas in Greece. The bill also included various other provisions that further weaken the legal framework for the protection of the environment in Greece. For example, as regards environmental permitting, the bill provided that the EIA assessors will be paid directly by the investor of the project, in contradiction to EU law which requires that there should be no conflict of interest among the competent authorities involved in the process. Despite concerns raised by environmental organisations and citizens, the rest of the provisions of the bill were enacted as law (Law 4964/2022).

In February 2022, seismic surveys were carried out in the area of the Ionian Sea as part of the concessions for the exploration and exploitation of hydrocarbon resources in the area. Following the non-lethal stranding of two Cuvier's beaked whales in the northern part of the Ionian Sea (Corfu) and strong protests by environmental

organisations, the surveys were discontinued. During the period of the seismic surveys, five lethal strandings of marine turtles were reported in Zakynthos, however, no autopsies were performed to ascertain the cause of death and the potential link with the seismic surveys.

ANNEX I BACKGROUND

For a full description of the site and of the case background see MEDASSET 2009 Update Report.

Since 1983, MEDASSET has lobbied the Greek Authorities and the European Commission (EC) for effective protection of the nesting beaches in Laganas Bay, Zakynthos, which led to the adoption of the Presidential Decree, providing constitution for the Zakynthos National Marine Park (ZNMP). A brief summary of the case history since 1994 is presented in the timeline below:

1994	<ul style="list-style-type: none"> MEDASSET made a formal complaint to the European Union; case No. 4/4667SG(94)A/15702 against the Greek Government for its failure to apply National and International Law and Bern Convention Recommendations, concerning the preservation of sea turtles on Zakynthos. In particular the Council Directive 92/43/EEC 21st May 1992, on the Conservation of European Wildlife & Natural Habitats of which the European Community is a party. The complaint was renewed each year until 1998.
1997	<ul style="list-style-type: none"> The complaint to the EC was put in abeyance. MEDASSET appealed to the EC Ombudsman.
1998	<ul style="list-style-type: none"> Eventually the annual complaints to the EC proved effective, leading to an “on the spot appraisal” by the EC Directorate-General (DG) XI, whose representative at the 18th Bern Meeting in 1998 announced the commencement of infringement procedures against Greece.
1999	<ul style="list-style-type: none"> The Zakynthos Case File was closed at the 22nd Bern Convention Meeting in 1999 subsequent to the EC initiative to take the Greek Government to the European Court of Justice for non-implementation of conservation legislation and EC Environmental Directives in Laganas Bay. The Presidential Decree providing the constitution for the Zakynthos National Marine Park (ZNMP) in Laganas Bay was signed immediately after the EC announced its action, in December 1999, during the Bern Convention Meeting.
2002	<ul style="list-style-type: none"> The EC lodged the Case at the European Court of Justice Ruling against Greece for failing the fulfil obligations under Article 12(1)(b) and (d) of Habitat’s Directive (92/43/EEC). Final written warning after on-the-spot appraisal showed Greece’s progress unsatisfactory.
2003	<ul style="list-style-type: none"> EC Delegation consisting of all Greek nationals conducted an ‘on-the-spot’ appraisal of Laganas Bay finding ‘substantial progress has been made towards effective implementation of a system of strict protection for the sea turtles’. The findings were in contradiction to the NGO Reports to the EC. A European Parliament Petition Committee visited Laganas Bay, highlighting in their report (10.12.03) to the Commission that “It was clear from our visit, conversations and pictures seen, that the provisions of the EC Directive are not being complied with...” Greek Authorities issued a “short-term timetable for the adoption of the remaining actions” in order to comply with the Court Judgement of 30th January 2002.
2004	<ul style="list-style-type: none"> Ombudsman denied NGO full access to the results of 2003 on-the-spot appraisal. The EC sent Greece a Final Written Warning 'Reasoned Opinion' urging the Government to comply within 2 months Greece responded to the EC’s ‘Reasoned Opinion’ by providing €90,000 towards the €300,000 debts of the non-functioning ZNMP Body On December 31st 2004 the Waste Disposal Area on the hill above Sekania nesting beach, once again overflowed and the beaches and Bay were awash with effluent. The Plant has been the subject of Public Health Department prosecutions since 2000.
2005	<ul style="list-style-type: none"> General Inspectors of Public Administration (GEDD) investigated Zakynthos in respects to compliance with ECJ ruling. Report gave strict recommendations to meet Ruling obligations. Director of the Land Registry of Zakynthos was hospitalised after having been violently assaulted following signing of official documents confirming the State owned the majority of land around the nesting beaches. NGOs MEDASSET and EuroNature delivered a 17,000 signature petition to the Greek Prime Minister. No response was issued.

	<ul style="list-style-type: none"> • The Minister of Environment appointed a replacement for the ZNMP President. A month later the NGOs lobbied against the appointment due to vested interests with his family owning illegal buildings on Daphne nesting beach. • New appointment of Prof. Amalia Karagounis-Kyrtsos of Athens University (current President) by Minister of Environment. • Local Zakynthos Prefect refused to demolish illegal buildings despite Government order eleven years beforehand to do so. • Daphne landowners lost an appeal at the Greek Constitutional Court to remove restrictions (imposed by the Presidential Decree constituting the Park) on private property development within the boundaries of the Park. • On 28th September 2005, a Management Body for the ZNMP was established according to the regulations outlined in the Park's Management Plan.
2006	<ul style="list-style-type: none"> • ZNMP President without the knowledge or consent of the Management Body developed a 'Pilot Management Plan of Daphne' and signed a 'Cooperative Agreement' with the owners of the local illegal building owners in Daphne. It indicated the locals should implement '...aesthetic and other improvements as indicated by the ZNMP' to their buildings. • A 'Pilot Management Plan of Daphne' was undertaken closing the beach and allowing the construction of 9 new buildings on the area directly behind the nesting beach. • NGOs filed formal complaint leading to Police visits and an arrest. • NGOs lobbied the EC for intervention on the continued construction. Multiple Press Releases were circulated. • Zakynthos Department of Urban Planning imposed fines ranging from €270 to €670,000 on those landowners that had further developed under the instructions of the ZNMP President (those that refused to co-operate with ZNMP President were not fined). • Local Daphne residents held protests destroying ZNMP guard posts and signage. • ZNMP President meets with EC DG Environment. Reports to media after she has successfully convinced the EC to close the ECJ Case and avoid fine.
2007	<ul style="list-style-type: none"> • EC DG Environment sent the NGOs a letter on their intention to close the ECJ Case. ECJ case closed on 27/6/2007. • Minister of Environment confirmed that the fines imposed on the local buildings in 2006 would not be removed. • ZNMP President instigates the construction of 2 new car parks (100 cars each) in Daphne, further facilitating access. No regulation of number of tourists on the beach. No EIA on the carrying capacity of the nesting beaches. • Mayor of the city of Zakynthos imprisoned for embezzlement of €10 million. • Improvement seen in the Management of the ZNMP; however the situation in Daphne remains largely the same.
2008	<ul style="list-style-type: none"> • Fines imposed 30 months ago by the Zakynthos Department of Urban Planning on illegal building owners have yet to be settled. • Discussions regarding the amendment of the existing Presidential Decree have been extensive. The President of the Park is making efforts to prevent changes to the Presidential Decree by promoting first a management plan for the area. • Although an official decision on the expansion or the relocation of the existing Waste Disposal Site (XYTA) has not been issued, it is anticipated that the expansion will not be approved since the Ministry of the Environment has made it clear in writing that such a development at Skopos is not a sustainable solution to the Zakynthos waste management problem. The ZNMP, the Hellenic Ministry of Environment and the NGOs agree that there can not be a XYTA at Skopos. Local authorities however strongly support such a development. • The representative of WWF in Zakynthos and sole representative of the NGOs on the Management Board of the ZNMP (WWF and ARCHELON are represented in rotation), submitted her resignation from Secretary General to the Board, claiming non-transparency of decision-making procedures.
2009	<ul style="list-style-type: none"> • The Zakynthos Municipal Council asked the ZNMP Agency to stop all activities related to the preparation of the 5-year Management Plan and to proceed with a new Special Environmental Study (SES) that would allow for a series of amendments to the Presidential Decree, favourable to local residents' property rights. • NGOs filed a joint letter of complaint to the Minister of Environment concerning the Waste Disposal Site operating within the ZNMP, demanding its immediate sealing and relocation outside the boundaries of the Park. • EC DG Environment Delegation visited Laganas Bay in June 2009 and inspected the Waste Disposal Site and Daphne nesting beach.

	<ul style="list-style-type: none"> • MEDASSET wrote to the ZNMP regarding the sound pollution generated by the illegally operating “Cameo” night club at Agios Sostis, affecting the entire Bay. • On May 29th the European Court of Human Rights ruled there had been a violation of Article 1 of Protocol No. 1 (protection of property) and that 2 million Euros be paid by the Greek State as compensation to the lawful owner of Marathonisi islet (part of the ZNMP). • Fines imposed in 2006 by the Zakynthos Department of Urban Planning on Daphne residents for engaging in illegal building activities remain unpaid. • The Zakynthos Municipal Council, in an extraordinary Meeting, unanimously asked the President of the ZNMP to resign. • Fires, declared by the Fire Brigade as the result of coordinated arson, destroyed 250,000 sq. meters of Mediterranean maquis vegetation surrounding Daphne nesting beach.
2010 – 2018	<ul style="list-style-type: none"> • MEDASSETs continues to update the Bureau with information in relation to Recommendation No 9
2019	<ul style="list-style-type: none"> • MEDASSET conducts an assessment on the implementation of Recommendation No. 9 (1987) and the ZNMP conservation measures. The report with supporting information from ARCHELON and WWF Greece is submitted to the Bureau, urging them to table the issues at Zakynthos for discussion at the 2019 Standing Committee meeting. • Concerns for the continuous issues, the Standing Committee decide to consider this closed file as a possible file, to discuss at the next Bureau meeting.
2020	<ul style="list-style-type: none"> • MEDASSET with supporting information provided by ARCHELON and WWF Greece submit a report with the findings of a site assessment to the Bureau, urging the file to be re-opened. • The 40th Standing Committee vote to re-open the case; 13 parties voted in favour, 2 against and 8 abstained. The File is re-opened. The authorities were against the re-opening of the file.

ANNEX II

REFERENCES

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- T-PVS (95) 63: MEDASSET (L.Venizelos): Specific Sites, *Caretta caretta*, in Laganas Bay, Zakynthos (Greece), 3 pages. (Follow-up report and recommendations).
- T-PVS (93) 32: L. Venizelos, MEDASSET: Marine Turtle Conservation in Zakynthos, Laganas Bay, Greece, 5 July-16 August 1993, 10 pages.
- T-PVS(92)83: MEDASSET activities 1991-1992. Declaration of MEDASSET on item 12.1 about Zakynthos. pp16-18

T-PVS(91)80: Statements by delegation, declaration on item 11.13 and intervention about Zakynthos. Presented by
L. Venizelos, J.Maigret. pp. 21-25

ANNEX III MAPS & PHOTOGRAPHS

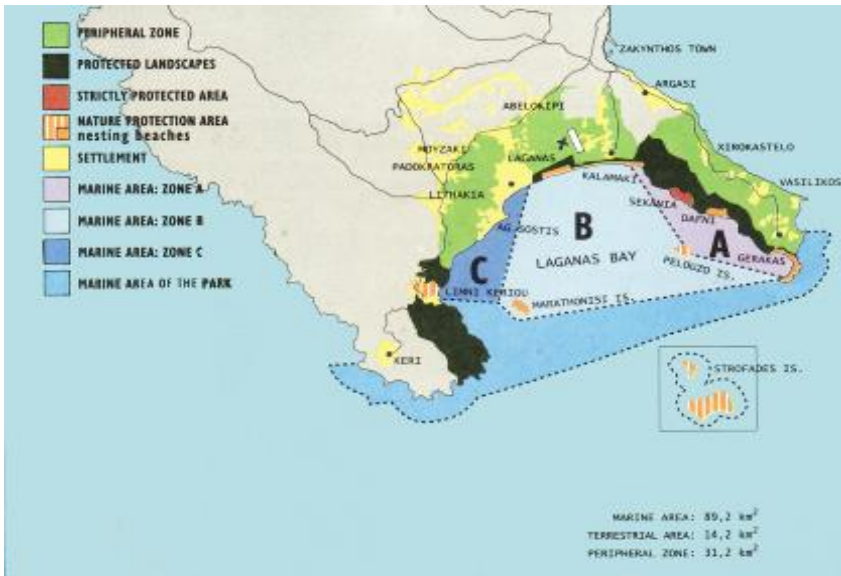


Fig. 1 | Zakynthos National Marine Park Map

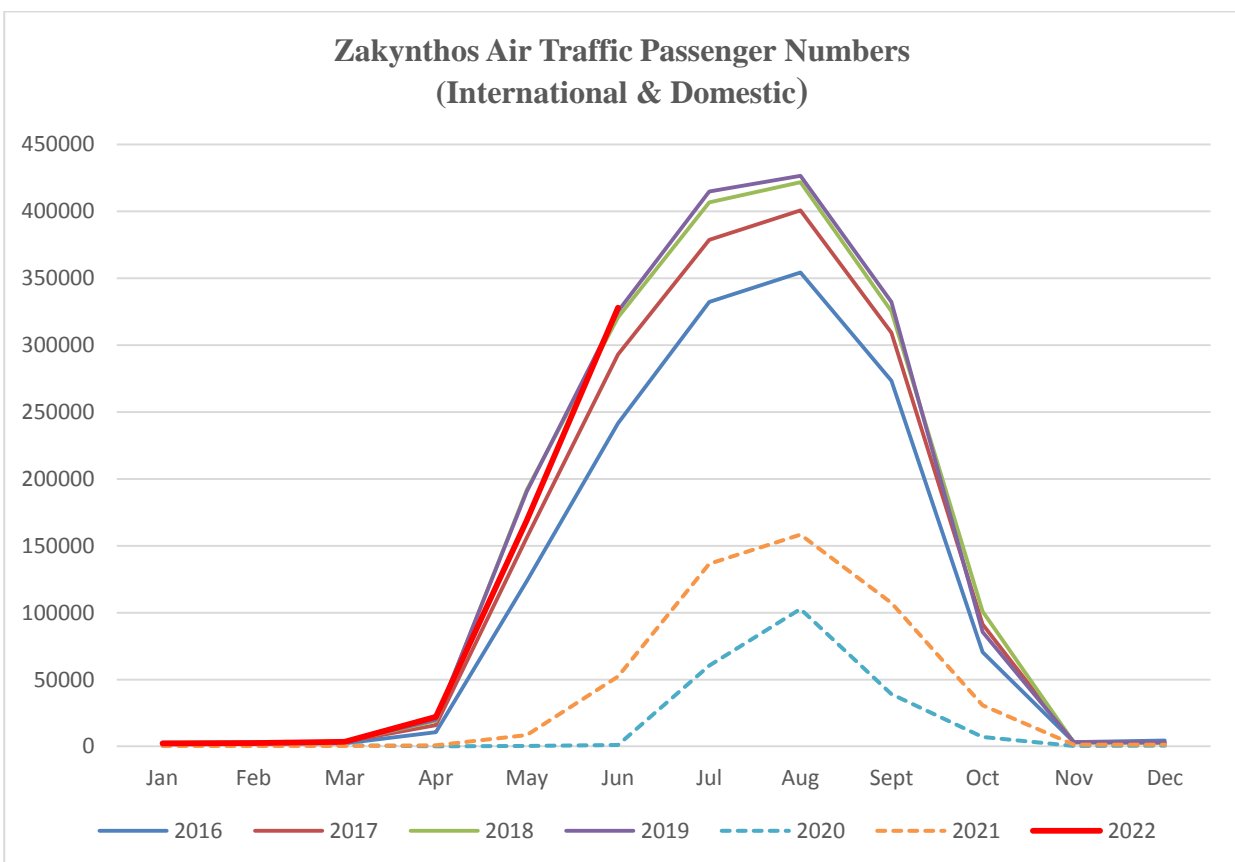


Fig. 2 | Data on air traffic passenger numbers to Zakynthos, 2016 – 2021 and Jan – June 2022. Dashed lines represent years affected by COVID pandemic. Data downloaded from the Hellenic Civil Aviation Authority for Zakynthos Airport. Hellenic Civil Aviation Authority - Our Airports - Zakynthos Airport "D.Solomos" (ypa.gr)



Fig. 3 | Daphne; 2020 Google Earth image: Natural and dune system destroyed.



Fig. 4 | Daphne 14th July 2022. 530 Sunbeds cover the destroyed natural sand dune system at the back of the nesting beach where grass has been introduced and maintained.

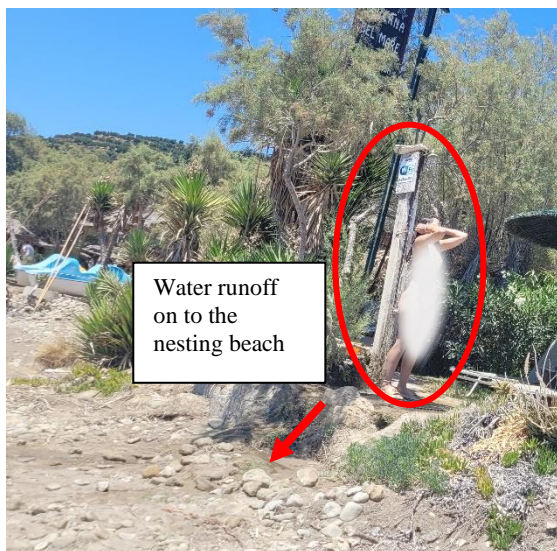


Fig. 5 | Daphne 14th July 2022. Public shower (Red circle) at the back of beach, with water runoff spilling onto the nesting beach in close proximity to nests (White circle).



Fig. 6 | Daphne 14th July 2022. No protective management measures (ropes, zoning) present on beach to ensure safe distances between visitors and nests (white circles) are maintained.

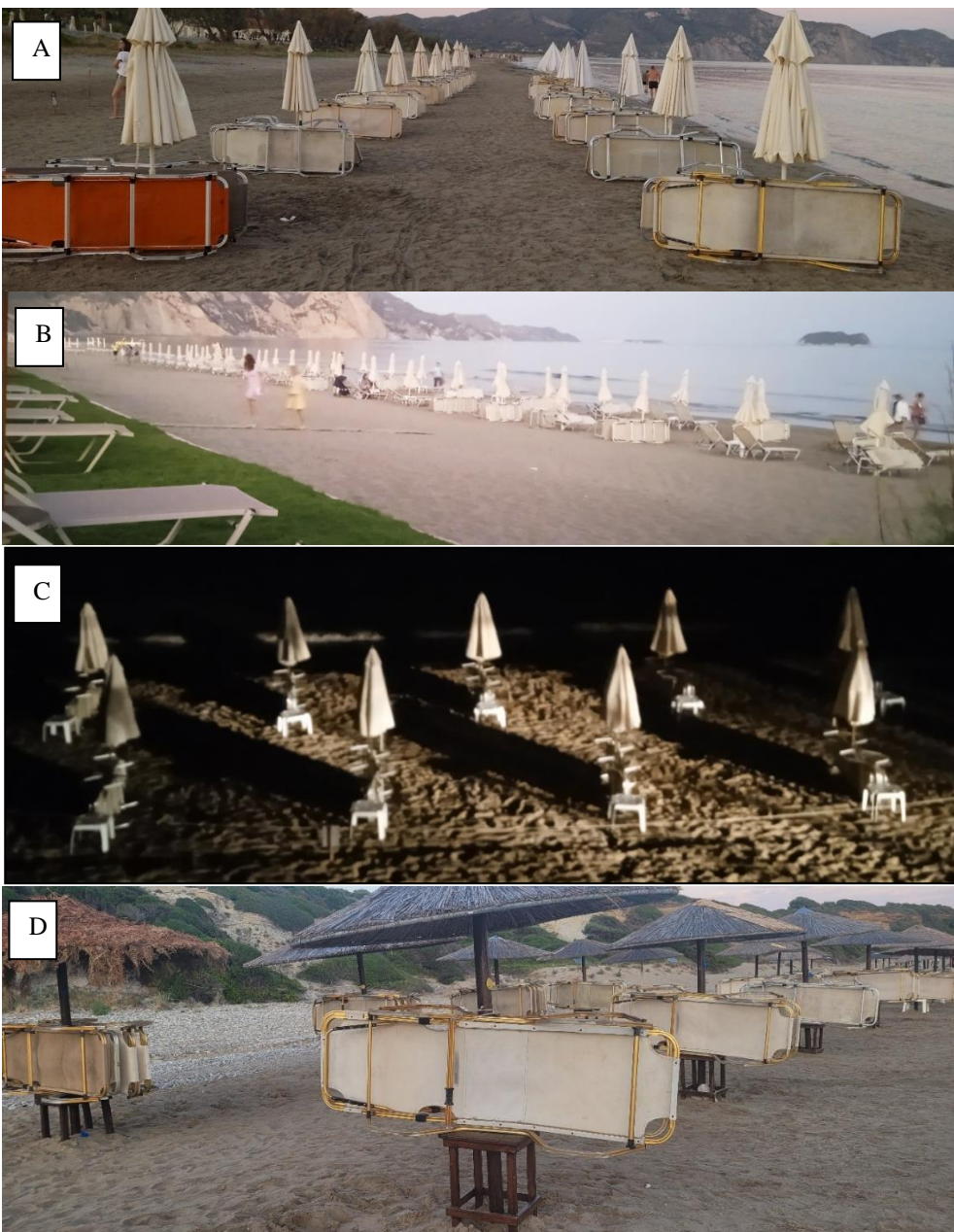


Fig. 7 | Laganas East, Zante Beach (A), Laganas East, Kalamaki Beach Taverna (B), Kalamaki (C) and Gerakas (D) 13th - 14th July 2022. No Sunbeds were removed from nesting beaches at night, reducing the space available for emerging nesting females.



Fig. 8 | Marathonissi 14th July 2022. In total 14 boats counted anchored to the nesting beach, where the maximum allowed at any one time is 10.

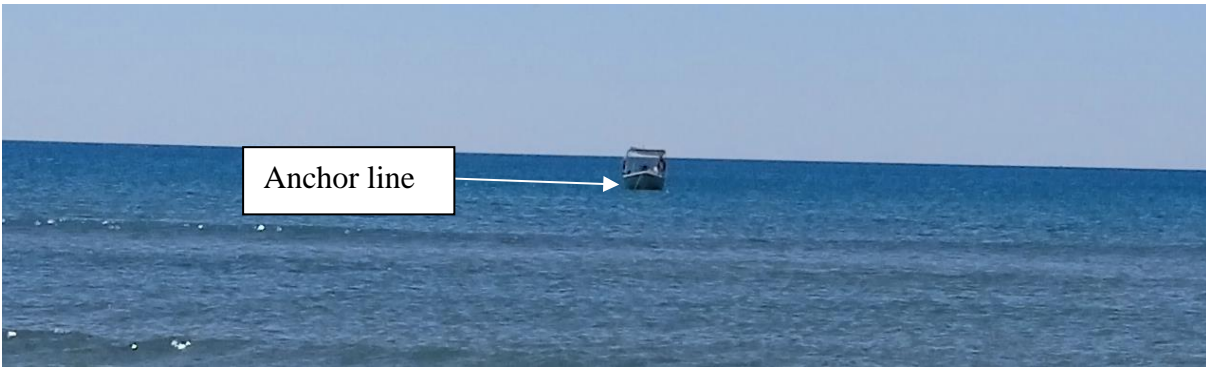


Fig. 9 | Maritime Area Zone B 14th July 2022. Private hire boats illegally anchoring in the ZNMP maritime Zone B, in the nearshore waters of Laganas East nesting beach.



Fig. 10 | Gerakas, 14th July 2022 21:39. No warden was present to stop visitors (white circle) entering the nesting beach after sunset. Visitors used a bright light to see their way.



Fig. 11 | Kalamaki 13th July. No warden presence at Kalamaki nesting beach resulted in people accessing the nesting beach after sunset (A, 21:39) and using bright torches along the water's edge (B, 21:53).



Fig. 12 | Marathonissi 14th July. Warden present (white circle), but no enforcement for maximum boat allowance was observed.





Fig. 13 | Laganas East 14th July 2022. Wetting of the sand (white circle) on the nesting beach to cool the sand for visitors (A). Movement and misuse of protective nest cages (B)

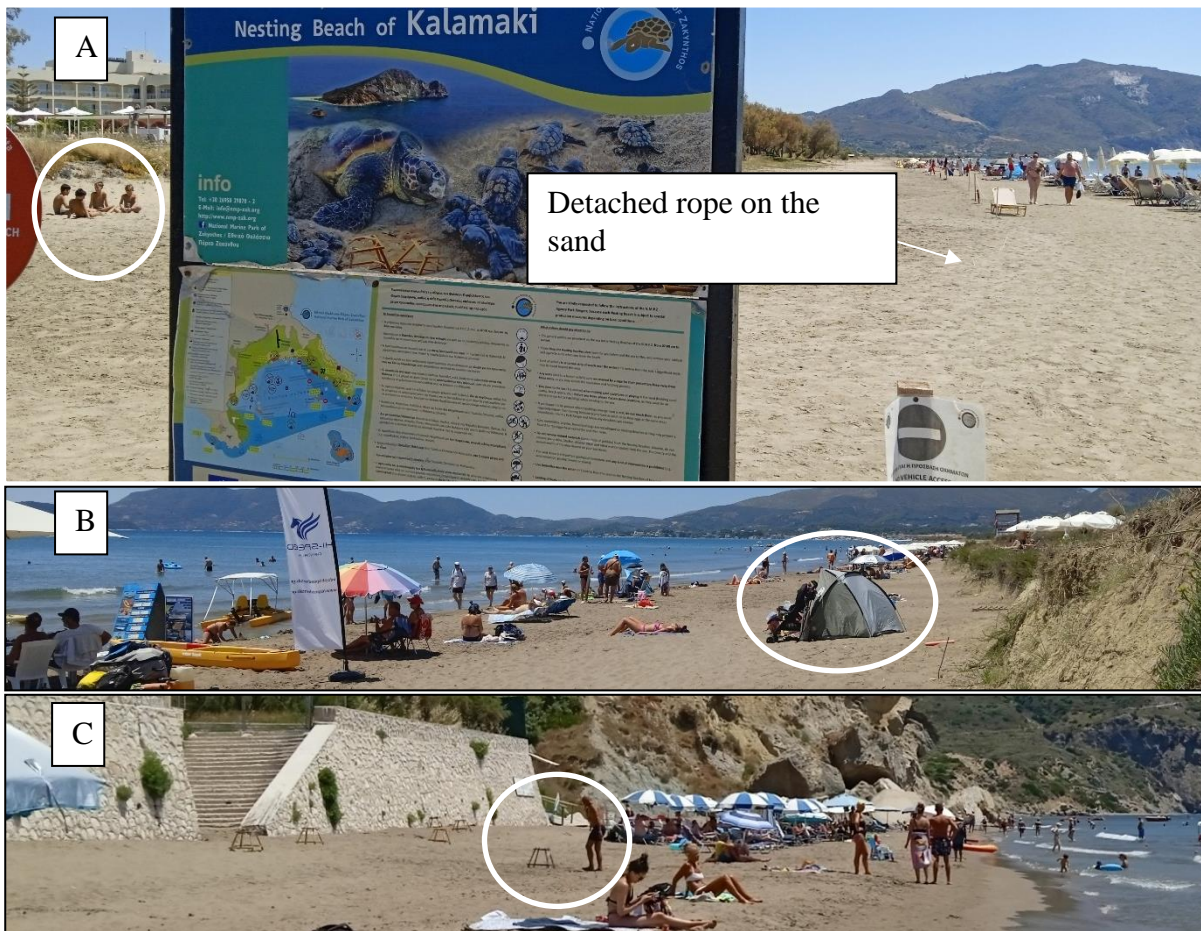


Fig. 14 | Laganas East, Zante Beach Hotel, 14th July 2022. Cordoned rope detached for zonation of nesting area and a group of children playing (White Circle) in the nesting area (A); No rope present at certain places along beach resulted in visitors being more than 5m from the water's edge (B) and no buffer zone from visitors around the caged nests (C).



Fig. 15 | Laganas East 14th July. Horse riders observed over the protected sand dunes. This activity continues to occur unhindered.

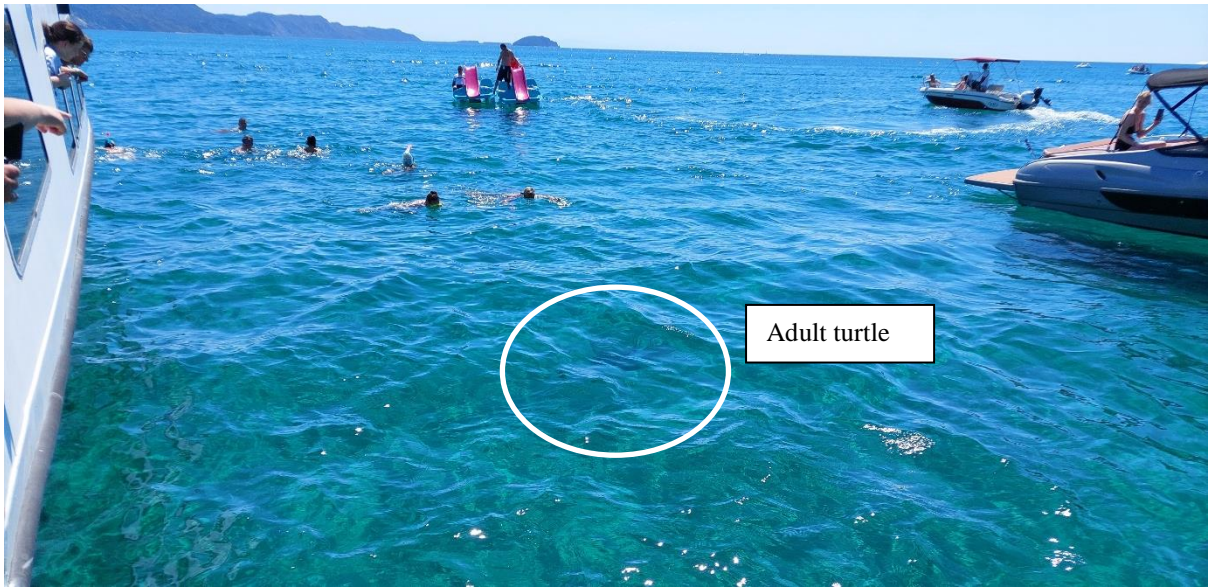


Fig. 16 | Agios Sostis 14th July 2022. Non-compliance to the turtle spotting regulations resulting in turtles being harassed in the Bay