

15/03/2023

RAP/RCha/GRC/6(2023)

## **EUROPEAN SOCIAL CHARTER**

6th National Report on the implementation of the European  
Social Charter

submitted by

**THE GOVERNMENT OF GREECE**

Follow-up to Collective Complaints No. 65/2001, 15/2003,  
30/2005, 49/2008, 66/2011, 72/2011, 111/2014, 131/2016

Report registered by the Secretariat on  
15 March 2023

**REPORT FOR FINDINGS 2023**

# 6<sup>th</sup> Greek report on the Revised European Social Charter

*Simplified Report  
Developments regarding the  
Collective Complaints against  
Greece*

*Ministry of Labour & Social Affairs*

*March 2023*

## Table of Contents

1. Collective Complaints: .....	3
(a) 15/2003 “European Roma Rights Centre (ERRC) v. Greece” & .....	3
(b) 49/2008 “International Centre for the Legal Protection of Human Rights (INTERIGHTS) v. Greece” .....	3
2. Collective Complaint 30/2005 “Marangopoulos Foundation for Human Rights (MFHR) v. Greece” .....	11
3. Collective Complaint 65/2001 “General federation of employees of the National Electric Power Corporation (GENOP-DEI) / Confederation of the Greek Civil Servants’ Trade Unions (ADEDY) v. Greece” .....	22
4. Collective Complaint 66/2011 “General federation of employees of the National Electric Power Corporation (GENOP-DEI) / Confederation of the Greek Civil Servants’ Trade Unions (ADEDY) v. Greece” .....	23
5. Collective Complaint 72/2011 “International Federation for Human Rights v. Greece” ...	24
6. Collective Complaint 111/2014 “General Confederation of Greek Workers (GSEE) v. Greece” .....	29
7. Collective Complaint 131/2016 “European Group of University Women (UWE) v. Greece” .....	36
Annex to CC30/2005.....	46

## 1. Collective Complaints:

(a) 15/2003 “European Roma Rights Centre (ERRC) v. Greece” &

(b) 49/2008 “International Centre for the Legal Protection of Human Rights (INTERIGHTS) v. Greece”

According to Presidential Decree (P.D.) 84 (Official Government Gazette 123/A/17-12-2019), the General Secretariat for Social Solidarity and Fight Against Poverty is competent for the coordination and supervision of issues related to the social integration of the Roma and in this context, it has been designated as the National Contact Point of the EU for Roma issues. On this basis, the primary objectives of the General Secretariat are the investigation of sustainable solutions and the implementation of effective interventions to improve the living conditions of Roma, through, inter alia, the elimination of the settlements, the integration of the Roma into the urban and social fabric of their living area and the improvement of the quality of life in degraded neighborhoods. These interventions aim at the full integration of the Roma population and the elimination of their social exclusion. Please, also, note that in Greece Roma people are equal Greeks and as such they enjoy the same rights and are bound by the same obligations that stem from the Greek Constitution.

### I. **National Strategy and Action Plan for the Social Integration of Roma (2021-2030)**

In the context of its competencies, the General Secretariat for Social Solidarity and Fight against Poverty drafted the new National Strategy and Action Plan for the Social Integration of Roma (ESKE Roma) for the reference period of 2021-2030, which aims at the inclusion, empowerment, active participation and at combating the social exclusion of the Roma in Greece. The new ESKE Roma is a continuation of the previous National Strategy 2010-2020 and is structured in four (4) pillars, which reflect national priorities and strategic objectives, policy measures and institutional interventions for the equality, inclusion and participation of Roma in national, local and regional level, through specific measures and actions. Particularly,

PILLAR I. "Prevention and fight against poverty and social exclusion of the Roma"

PILLAR II. "Strengthening Roma equality in basic services and goods (education, employment, health, social care and housing)"

PILLAR III. "Preventing and combating stereotypes and discrimination against the Roma"

PILLAR IV. "Promoting the active participation of Roma in social, economic and political life"

The new ESKE Roma is based on the fundamental values of the EU for a society of equal treatment, rights and opportunities for all and in this context, holistically approaches the social inclusion of the Roma, through targeted interventions in the areas of housing, health, education, employment and strengthening access to general inclusion policies, given they are considered as equal Greek and European citizens. Also, special emphasis is given on the prevention and combating of stereotypes, taking into account in particular the gender dimension and issues of social integration and exclusion of the Roma from the labour

market. In addition, the establishment of realistic and measurable monitoring and evaluation indicators of Roma social integration measures and actions is promoted.

ESKE Roma 2021 – 2030 integrates the directions, priorities and goals, which have been placed in the political strategic framework for the integration, equality and participation of the Roma until 2030, in Recommendation of March 12, 2021, as well as the principles and objectives of the Action Plan for the European Pillar of Social Rights. It is the result of a participatory process, with the contribution of the co-competent ministries and supervised entities, the Special Services for the Management of Operational Programmes as well as representatives of the Roma.

Finally, in the context of a holistic handling of the issues related to the social integration of the Roma, as well as their active participation in the decision-making process, the new ESKE Roma provides for the establishment of committees to promote social dialogue in the fields of equality and the socio-economic inclusion of the Roma. In particular, a Roma Governmental Committee has already been established (O.G.G.183 A'/2022) with the participation of the General Secretaries of all relevant Ministries, under the chairmanship of the General Secretariat of Social Solidarity, whose task is to plan the implementation and update of the Pillars of ESKE, as well as the coordination of synergies and the general implementation of the National Strategy. In addition, it provides for the establishment of a National Advisory Committee for the Social Integration of the Roma, with the participation of representatives of co-competent Ministries, relevant bodies, representatives of Civil Society and Roma Organizations. The Commission will be a consultative body on matters of promoting social dialogue in the field of equality, socio-economic inclusion and the substantial participation of Roma in the decision-making process. Finally, ESKE provides for the establishment of a Roma Forum with the participation of representative organizations and the aim of promoting the consultation and participation process of the Roma.

## ***II. Measures to improve the living conditions of the Roma***

The General Secretariat of Social Solidarity, within the framework of its responsibilities, constantly takes targeted measures to improve the living conditions of Roma families. In the National Strategy and Action Plan for Roma Inclusion 2021-2030, housing is one of the sectoral objectives and therefore systemic interventions have been designed to promote Roma social housing, with the aim of creating the appropriate conditions for their gradual but full social inclusion. Based on the "Housing first" approach in the process of drafting the Strategy, measures have been designed to improve housing and living conditions taking into account the characteristics of the Roma communities in Greece.

With regard to the existing legislation, with the aim of facilitating housing assistance to the Roma, in 2017 the framework for the temporary relocation of Special Social Groups was established<sup>1</sup>.

---

<sup>1</sup> Law 4483/2017 (OGG107/A') followed by Joint Ministerial Decision RO68/20 412/B/12.02.2018, as amended by RO 28586/283/22.05.2018 (OGG1924/B'/30.05.2018).

In 2021, the General Secretariat planned and implemented a nationwide mapping to collect updated data regarding the current socio-economic situation in the regions of the country inhabited by Roma communities. The data collected through the 142 municipalities with high concentrations of Roma are the basis for the correct targeting of the interventions within the framework of the new National Strategy and Action Plan for the Social Integration of the Roma, as well as for the monitoring and evaluation of the interventions of the new National Strategy within the monitoring mechanism of Roma integration policies.

Based on this mapping, the Roma population in Greece amounts to approximately 117,495 permanent residents and constitutes 1.13% of the permanent population of the country. It is found in all 13 Regions, with higher percentages of concentration in the Regions of Attica (25%), Eastern Macedonia and Thrace (17%), Thessaly (14%), Western Greece (13%).

In total, 462 Roma living areas were identified of which 266 are settlements of types I, II, III and 196 are locations where Roma live within cities, in houses, apartments, shacks, etc. In particular, based on the updated mapping of Roma in 2021, in Greece there are:

*77 Type I settlements, approximately 12,216 inhabitants*

They are located in highly degraded locations with makeshift accommodation (shacks, huts, tents, etc.) usually outside urban areas and city plans without public infrastructure, roads and access to public transport, etc.

*122 'mixed' Type II settlements - dwellings together with huts and shacks, approximately 46,838 inhabitants*

These settlements are located in areas of mixed population that have basic utility infrastructure and adequate housing, although regionally there are several shacks and substandard accommodation. This category is mainly found on the outskirts of cities and outside the city plan. Within Type II many settlements are very close to the Type I category and require significant interventions.

*67 Neighborhoods Type III - houses/apartments, containers, often in degraded areas of the urban fabric), with a number of 34,741 inhabitants*

They are located in poor neighborhoods within the urban fabric with basic, low-quality, utility infrastructure.

Type I and II settlements are of high priority for the Greek state, as they are degraded areas that lack basic infrastructure and decent living conditions.

Based on the above mapping and categorization of the settlements and in accordance with the aforementioned legislative framework, [the housing assistance for the Roma, which is planned and implemented in cooperation with the Local Authorities, includes the following:](#)

### *Organized Temporary Relocation Areas (housing complexes designed according to social housing principles)*

Management Bodies are the municipalities that have within their boundaries type I Roma settlements and are responsible, based on the principle of proximity and proportionality, to provide their citizens with basic services and goods. Roma populations living in temporary or illegal shacks/settlements should be relocated immediately or, until this becomes possible, care should be taken to provide improved living conditions, with the aim of their gradual and full integration into the wider urban and social fabric.

Article 159 of Law 4483/2017 on the temporary relocation of special social groups provides for the licensing and operation of organized areas, which are developed as social housing complexes according to bioclimatic planning principles based on the urgent housing needs of special social groups. The operation of such areas requires a holistic approach (through Community Centers - Roma Branches) - with the provision of social services that help the integration process.

In addition, the agency responsible for the implementation of the relocation must have a management unit/team in the area, which will cooperate both with the relevant municipal services and with the Roma Branch or Community Center and other social services. The operation of such a group helps to address the risk of deterioration of the housing complex and the participation of Roma in the management of the housing complex.

Based on the aforementioned legislative framework, the Ministry of Labour and Social Affairs in cooperation with the Municipality of Katerini and the European Organization for Fundamental Rights (FRA) within the framework of the EEA Grants Programme 2014-2021 "Integration and Empowerment of the Roma" is implementing relocation in the due Municipality.

### *Improvement of living conditions, mainly sanitary infrastructure and environmental conditions*

In the event that the temporary relocation of vulnerable social groups is not possible due to a lack of available suitable land, paragraph 8 of article 159 of Law 4483/2017 provides for interventions to improve living conditions, given that in several Roma camps, particularly in settlements of Type I (settlements) and Type II (mixed settlements), there is an urgent need for immediate provision of individual hygiene services and environmental interventions, in order to create the conditions for the Roma population to have access to such infrastructures and, therefore, access to basic public utilities and goods.

The provisions of paragraph 8 of article 159 of Law 4483/2017 provide for the creation of temporary or mobile hygiene and individual cleaning units with toilets, public baths and laundry facilities. The aforementioned interventions are combined with the provision of wider support services through the Community Centre.

### *Basic infrastructure*

In Type II and Type III Roma settlements that lack basic infrastructure or have not completed the necessary infrastructure (sewerage, water supply, roads, asphalt pavements, pavements, restoration of common areas, etc.), the relevant interventions will be carried

out. Eleven (11) Municipalities have requested, so far, funding for infrastructure interventions (Megara, Ilida, Ampelokipon-Menemeni, Karditsa, Piniou, Delta, Serres, Katerinis, Trikala, Thebes, Lamia).

By virtue of Law 2790/2000, the Hellenic Republic Ministry of Interior assumed the responsibility for implementing and monitoring the government's policy on the reception, hospitality, assistance, smooth adaptation and social integration of returning migrants of Greek descent from the countries of the former Soviet Union.

In order to tackle social exclusion, the Ministry, through the National Public Investment Programme (PIP), finances **infrastructure projects (housing, water, etc.) to improve and enhance the living conditions of Roma in areas where they live**. In this context, the projects listed in the table below have been included in 2022:

Year	Project code	Title of project	Implementing body	Budget
2022	2019ΣΕ05500001	DEVELOPMENT OF BASIC NETWORKS IN THE SETTLEMENT OF MAVRIKA KARDITSAS – DEYAK PROJECT (PHASE B')	DEYA KARDITSAS	372.000,00
2022	2020ΣΕ05500004	TEMPORARY RELOCATION OF SPECIAL SOCIAL GROUPS IN THE "PELEKA" POSITION OF THE MUNICIPALITY OF KATERINI	TECHNICAL SERVICES OF THE MUNICIPALITY OF KATERINI, PREFECTURE OF PIERIA	2.700.000,00
2022	2018ΣΕ05500039	GRANT TO DEYA KARDITSAS FOR THE PROJECT – EXPANSION OF SEWAGE NETWORKS FOR WASTEWATER AND RAINWATER IN AREAS INCLUDED IN THE TOWN PLANNING IN THE CITY OF KARDITSA	DEYA KARDITSAS	1.946.326,69
2022	2018ΣΕ05500041	CONSTRUCTION OF INFRASTRUCTURE WORKS IN THE SETTLEMENTS OF KIPIAKI AND PYRGOS OF THE MUNICIPALITY OF TRIKKAION WHERE	MUNICIPALITY OF TRIKKAION	1.307.267,92



		ROMA LIVE		
2022	2018ΣΕ05500043	CONSTRUCTION OF INFRASTRUCTURE PROJECTS IN THE AREA OF 'VLYCHO' IN MEGARA WHERE ROMA LIVE	MUNICIPALITY OF MEGARA	730.000,00
2022	2018ΣΕ05500047	CONSTRUCTION OF SEWAGE NETWORKS FOR WASTEWATER AND RAINWATER IN THE AREAS PAPAKAFKA AND TSIXLEIKA AMALIADAS	MUNICIPALITY OF ILIDA	2.333.156,39
2022	2018ΣΕ05500052	DEVELOPMENT OF BASIC NETWORKS IN THE SETTLEMENT OF MAVRIKA KARDITSAS – MUNICIPALITY PROJECT (PHASE B')	TECHNICAL SERVICES OF THE MUNICIPALITY OF KARDITSA, PREFECTURE OF KARDITSA	326.006,95
2022	2018ΣΕ05500051	PREPARATIONS FOR THE RELOCATION OF A ROMA SETTLEMENT IN THE SETTLEMENT OF PELEKAS IN THE MUNICIPALITY OF KATERINI	MUNICIPALITY OF KATERINI	88.447,34
2022	2019ΣΕ05500012	GRANT TO DEYA OF LAMIA FOR THE PROJECT «WATER PROVISION FOR THE RELOCATION SETTLEMENT OF ROMA IN KAMILOVRISI LAMIAS»	DEYA OF LAMIA	27.000,00

For the best, holistic and targeted implementation of the above, the General Secretariat of Social Solidarity has requested from all Municipalities to draft Local Action Plans with the aim of supporting Roma social integration actions at the local level and the effective implementation and monitoring of the actions and interventions of the new National Strategy and Action Plan for the Social Integration of the Roma.

In addition, the Secretariat of Social Solidarity has intensified its efforts to raise awareness and mobilize local government in terms of making interventions in the housing sector and the submission of proposals by Municipalities with an emphasis on ensuring decent living conditions. In the period 2020 - 2022, the General Secretariat has intensified autopsy visits to Roma settlements and has organised meetings, both with representatives of the Roma community and with Municipal Authorities throughout Greece, in order to promote relevant relocation interventions or improvement of living conditions according to local needs.

It is also noted that the Roma as Greek citizens are beneficiaries of the horizontal allowances and benefits granted based on income criteria to vulnerable households, namely the Minimum Guaranteed Income, the Birth Benefit, the Child Benefit, the Housing and Work Programme for the Homeless.

Besides, taking into account that the improvement of living conditions needs a holistic approach, the Greek State has taken measures for the substantial social integration of the Roma, aiming, specifically, at reducing school dropouts. For this purpose, it has defined as a condition for receiving the Child Benefit and the Minimum Guaranteed Income, the children's sufficient attendance in compulsory education.

Finally, within the framework of the Regional Programmes 2021-2027, **actions aimed at improving the living conditions of the Roma and avoiding social exclusion have been foreseen, such as:**

#### *Groups for the Improvement of Living Conditions*

It refers to temporary interventions aimed at improving the living conditions in the settlements, until the relocation takes place. The aim of the action is to improve living conditions, so that the beneficiaries can participate in other actions (education, employment, capacity building and empowerment of the Roma, etc.).

#### *Integrated programmes for the inclusion of Roma in the labor market*

They combine rent subsidy and counseling-guidance actions, vocational training, certification of knowledge and skills acquisition, as well as empowerment and breaking down stereotypes through awareness-raising actions.

### ***III. Developments regarding the EEA-funded programme “Integrated social housing relocation pilot programme for the integration of Roma” in the Municipality of Katerini***

Pursuant to the previous Greek report and regarding the programme in the Municipality of Katerini, we would like to inform you of the following:

- The project in the Municipality of Katerini is the only one that has been implemented so far, and given that its implementation is based on a combination of funds (EEA grants, ESF+ and State Budget), it is considered a pilot programme.
- It is worth mentioning that the transition to social housing (10-year transition period) is considered as a step in a long-term integration process.

- The project has already contributed to the preparation of the Roma so that they can participate equally in social and economic life. The results so far (2020-2022) have shown that it has already improved the daily life of the local Roma community.
- The temporary housing relocation project in Katerini is based on art.159 of Law 4483/2017 which sets a series of conditions as mentioned above. Among them is consultation with Roma communities, as one of the initial steps of the resettlement process.

#### **IV. Temporary stopping places**

We would like to inform you that there are no temporary transit points in Greece, as Greek Roma are not Travelers, nor is there any official information/data about Travelers passing through Greece and requesting temporary stopping places. On the contrary, the majority of Roma in Greece live in specific settlements as described above.

As regards forced evictions of Roma families, the Greek state provides for the elimination of them by promoting the implementation of art.159 of Law 4483/2017 as described above.

## 2. Collective Complaint 30/2005 “Marangopoulos Foundation for Human Rights (MFHR) v. Greece”

### 1. Legislative and other Developments

#### 1. LIGNITE PHASE-OUT

As for the implementation of the European Green Deal in electricity generation, Greece has decided to develop an ambitious plan for the **withdrawal of the existing lignite-fired power plants**. The lignite phase-out plan includes the withdrawal of all lignite power plants and the corresponding mines by 2028, in full compliance with the provisions of the revised National Plan for Energy and Climate (Decision ΚΥΣΟΙΠ/4/31.12.2029 and Law 4936/2022 (National Climate Law)).

The operation of the following Steam-Electric Power Plants has already been suspended:

- Amyndeon Units I, II (of a total power of 600 MW): Shutdown 05.2020, Decision of the Regulatory Authority for Energy (RAE) for definite withdrawal 217/2021 (OGG 1323/B'/05.04.2021) by excluding the Units from the Single Production License
- Kardia Units I, II (of a total power of 600 MW): Shutdown 06.2019, RAE decision for definite withdrawal as above.
- Kardia Units III, IV (of a total power of 600 MW): Shutdown 05.2021, RAE decision 758/2021 (OGG 6022/B'/20.12.2021) excluding the Units from the Single Production License
- Amyndeon and Kardia Mines

The lignite phase-out plan is being implemented with full respect to **DEI, i.e. the Public Power Corporation (PPC)**, employees, local communities and the environment. The company has already adopted appropriate solutions for district heating in order to provide continuous support to local communities in terms of the lignite phase-out plan implementation and fair development transition (Law 4872/2021).

#### 2. DEVELOPMENTS RELATING TO THE LEGISLATION ON ENVIRONMENTAL INSPECTIONS

In the context of development and revision of environmental legislation, in 2021, **Law 4843/2021 (OGG A'193/20.10.2021)** was issued, which reformed inter alia the framework of environmental inspections. Specifically, Articles 50-53 **update the legislative framework of environmental inspections**, with emphasis given on promoting the compliance of projects/activities subject to environmental inspection with the provisions of the existing environmental legislation.

The objective is that inspections should aim to improve environmental management efforts on the part of those inspected without being “punitive”, unless the infringements are significant and pose an imminent and serious risk to the environment and human health, thus enhancing legal certainty. Additionally, the objective is that any fines and sanctions should be proportionate and reasonable, based on the risk assessment that the infringement entails for the protection of the public interest and imposed in accordance with the following: the seriousness of the infringement, its frequency or duration, recidivism and compliance history, the behavior and degree of cooperation of the inspected body, the level at which the statutory emission limits are exceeded and the breach of environmental

terms and standards of environmental commitments, reasons of public interest and any mitigating or aggravating factors, including the direct or indirect profit that the infringement has conferred on the project or activity operator.

Additionally, the Joint Ministerial Decision ΥΠΕΝ/ΣΕΝΕ/13582/952/22.02.2021 was issued, which defines the methodology for the classification of the economic activities falling under the environmental categories A and B of Article 1 of Law 4014/2011 (OGG209/A'), as in force, the degree of risk with regard to environmental protection. Based on the environmental risk assessment and this classification, programmes for regular environmental inspections shall be prepared.

Subsequently, pursuant, to an enabling provision of the aforementioned Law 4843/2021, the Ministerial Decision ΥΠΕΝ/ΓΔΣΕΕ/16675/165/21.02.2022 (OGG776/B') by which the **Compliance Action Model** for the environmental inspections shall be adopted, in the context of a uniform response to the inspections conducted by the authorities carrying out environmental inspections. It also specifies the content of the interim and final inspection report and the Remedial Action Plan, the assessment of the gravity and the classification of environmental infringements, the application of administrative measures and sanctions and the method of calculating the amount of fines imposed for environmental infringements. Environmental inspections are now carried out on the basis of the above framework.

### 3. INSPECTION ACTIVITIES

#### 3a. INSPECTORATE OF SOUTHERN GREECE

##### DEPARTMENT OF ENVIRONMENTAL INSPECTION

With regard to data and information updating on the control actions of the Environmental Inspection Department in the area near Asopos at the prefectures of Boeotia and East Attica, from 2020 until today, taking into account the strict measures and restrictions imposed due to the COVID-19 pandemic, which partially and/ or fully suspended the inspection activity in the area, we report the following:

The Environmental Inspection Department conducted on-site inspections at **six (6)** industrial activities in the area near Asopos to verify compliance with the applicable environmental legislation and the approved environmental terms. Environmental infringements were detected and confirmed in **two (2) industrial activities** for which administrative sanctions were recommended and the files were forwarded to the relevant Prosecutor's Office for investigation of criminal acts.

Additionally, it conducted on-site inspections at **thirty-five (35) industrial activities** that dispose of their wastewater in the Asopos River to take samples and check compliance with the emission limit values according to Annex B of the 20488/2010 JMD (OGG749/B') as amended by the 100079/20/2015 JMD (OGG135/B') and in force. These sample checks showed that the emission limit values were exceeded across **twelve (12) industrial activities** which were included in the planning for regular checks and repeated sampling.

## **MINE INSPECTION DEPARTMENT**

With regard to issues within the competence of the Mine Inspection Department, we remind you that the said Department<sup>2</sup> is mainly responsible for the inspection and supervision of the mining and quarrying activity, the rational exploitation of the country's mineral wealth, the safety and health of workers and residents from mining and quarrying areas, as well as for the elimination of illegal mining and quarrying activity.

In particular, with regard to inspection actions within the competence of the Mine Inspection Department, we inform you that, following an inspection carried out on 9/12/2020 at the premises and mobile workshops of a repair contractor, the ΥΠΕΝ/ΣΕΝΕ/125619/7830/30.12.2020 document was issued for the compliance of the operating company (LIGNITIKI MEGALOPOLIS S.A.) in accordance with the current mining legislation and the provisions of the Regulation on Quarrying and Mining Operations. It is noted that there was compliance by both the contractor and the operating company with all observations.

### **3b. INSPECTORATE OF NORTHERN GREECE MINE INSPECTION DEPARTMENT**

For issues concerning the activity of PPC S.A. (DEI) in the wider region of Western Macedonia, the Mine Inspection Department deals with issues related to the mining of lignite that feeds the lignite mining plants. The inspection and operation supervision of the lignite mining plants of Western Macedonia is not included in the scope of the Mine Inspection Department's responsibilities, as these are not governed by the provisions of the Mining and Quarrying Regulation.

Mine inspectors of the Mine Inspection Department/ Inspectorate of Northern Greece carry out on-site inspections in the mines of the Western Macedonia Mining Center, in cooperation and jointly, where appropriate, with the PPC workers' representatives, taking into account any comments and suggestions that may have, in order to ensure the implementation of the provisions of the Mining and Quarrying Regulation. Orders are given for the holding, concerning both the holding itself and the safety of workers and residents, in accordance with the provisions of the Mining and Quarrying Regulation and fines are imposed for violations of the current Mining Legislation.

As regards the inspections at the Western Macedonia Lignite Center of PPC S.A., the Mine Inspection Department/ Inspectorate of Northern Greece, following the inspections carried out, during which violations of the Mining and Quarrying Regulation were detected, proceeded to fine imposition.

These fines, which mainly concern infringements of the Mining and Quarrying Regulation and occupational safety issues, are shown in the table below:

---

<sup>2</sup> In accordance with Presidential Decree 132/2007, the provisions of the Regulation on Quarrying and Mining Operations-KMLE (Ministerial Decision Δ7/A/12050/2223 OGG1227/B'/2011), of the Mining Code (Legislative Decree 210/1973) and of Law 4512/2018 (OGG 5A'/2018).

YEAR	NUMBER OF FINES PPC S.A.	TOTAL AMOUNT (€)
2019	2	30.002,00
2020	4	91.402,00
2021	2	29.003,00
2022 (until today)	-	-

## II. Update of PPC (DEI) S.A. data

### A. Environmental Issues

#### **1. ENVIRONMENTAL POLICY PPC S.A. - ENVIRONMENTAL MANAGEMENT SYSTEMS**

The Management of PPC S.A., adopting the principles of sustainable development, aligns the operation of its production activities in order to achieve the country's energy and climate objectives, as reflected in the National Plan for Energy and Climate (ESEK).

The Board of Directors, by the 88/17.7.2022 Decision, approved the revised Sustainable Development Policy of the Group and the Environmental Policy of PPC S.A., as an integral part of it and transposed them into the Operating Regulations of PPC S.A. The Environmental Policy applies to every sector of the Enterprise's economic activity, such as energy production, lignite mining, commercial activities, offices, support services, including contracting and subcontracting operations.

As part of its Environmental Policy, PPC S.A. develops and implements an Environmental Management System at its main production units, in accordance with the ISO 14001:2015 Standard, in order to achieve:

- Continuous improvement in the management of energy resources, waste, air quality and noise,
- prevention of and response to leakage-emergency incidents,
- environmental awareness and staff training,
- better communication on environmental issues and
- in general, improvement of the environmental and natural resource management, to ensure the sustainable development of the Company.

The Environmental Management System (EMS) organizes the monitoring, management and ultimately the limitation/mitigation of environmental consequences associated with the PPC S.A. production activities.

PPC S.A. has certified Environmental Management Systems (ISO 14001:2015) at the West Macedonia Lignite Center and at the following power plants, which produce approximately 92% of the electricity generated by PPC S.A.

**Power plants with Environmental Management System certification (Data of 2021)**

Lignite-fired power plants	Natural gas power plants	Oil-fired power plants	Hydroelectric power plants
Agios Dimitrios	Keratea-Lavrion Komotini Aliveri Megalopolis V	Atherinolakkos Chania Linoperamata Skyros Soronis – Rhodes Karpathos Samos Chios Kos Lemnos	Aliakmonas Arachthos Achelous Nestos Ladonas

*Note: The power plants operated by the PPC S.A. affiliates, single-member company Lignitiki Megalopolis S.A. and single-member company Lignitiki Melitis S.A. also have certified Environmental Management Systems ISO 14001:2015*

**Additionally, in 2022,** the Environmental Management Systems of other Autonomous Power Plants as well were developed, implemented and certified in the Non-Interconnected Island System (Milos, Thera, Lesvos, Paros and Ikaria).

The ISO 14001 certification of the Environmental Management Systems is granted following internal and external inspections carried out by independent certification bodies.

## **B. Occupational Health and Safety issues**

### **1. MEASURES ENSURING COMPLIANCE WITH HEALTH AND SAFETY RULES TO PREVENT ACCIDENTS**

PPC S.A. with its approved “**Health and Safety Policy**” (updated January 2021), posted on its website, has adopted occupational Health and Safety principles which ensure life protection for employees and third parties performing work on its premises and facilities.

In particular, it applies:

#### **1.1. Certified Occupational Health and Safety Management Systems:**

As it has been mentioned in previous reports, since 2010, Management Systems have gradually begun to be implemented at all Steam Power Plants and Mines according to the then applicable International Standard **OHSAS 18001:2007 (ELOT 1801:2008)**. The aim is to continuously improve their performance in the field of occupational safety and health and particularly, in terms of continuous improvement of accident indicators, via accident prevention and risk reduction actions as well as the impact of harmful factors. The System describes procedures for the safe work execution, inspection and certification procedures. Initial certification is followed by stages of constant regular inspections by an external certified body for the continuous System improvement.

Both at the Power Production Plants (2020) and at the Mines of West Macedonia and Megalopolis (2021) the transition process from the OHSAS 18001:2007 (ELOT 1801)



standard to the new international **ISO 45001:2018** standard was completed, following successful inspections of their systems' recertification by independent bodies. Certification is granted following internal and external inspections by independent certification bodies.

### 1.2. PPC S.A. applies the OSH legislation

As mentioned in previous Reports, the management of Health and Safety issues is based on the **Code of Laws related to Occupational Safety and Health** ratified by Article one of Law 3850/2010 (OGG84/A') and more specific laws. In particular, Greek legislation on Occupational Safety and Health is fully harmonized with the corresponding Community legislation, via the transposition of both the Framework Directive 89/391 EEC and the specific Directives deriving from it.

According to the provisions of Code of Laws related to Occupational Safety and Health, the employer is obliged to ensure the safety and health of workers in all aspects of work and take measures to ensure the safety and health of third parties (employer's liability principle), to use the services of a safety technician and an occupational physician, to provide appropriate means of personal protection. In any case, the employer must have at his disposal a written assessment of the work-related safety and health risks, including those relating to groups of workers exposed to particular risks.

### 1.3. Special Internal Regulations

The Mine operation is based on the **Regulation of Mining and Quarrying Operations** which was updated in 2011, in order to be in line with the latest developments of the relevant Legislation (Ministerial Decision Δ7/A/12050/2223/2011 (OGG227/B'/14.6.2011). All operations at the Mines are governed by the Regulation in terms of rational activity, safety and health of workers and residents and environmental protection.

Indicatively, some internal regulations that have been developed and implemented after the relevant trainings, following the provisions of the Regulation of Mining and Quarrying Operations are the following:

- The **“Single Regulation for Issuing Work Permits (EKEAE) in the case of Thermal Power Plants”** which provides the general rules for issuing work permits before starting a work at the installation and the procedures for the safe isolation of the equipment. It is a single procedure for work preparation and delivery (damage repair, preventive maintenance, equipment repair and construction) and document handling, in order to precisely define the safety measures that will eliminate potential hazards for both workers and equipment.
- The **“Manual for Safe Work at Electric Power Plants”** which along with the Single Regulation for Issuing Work Permits in the case of Thermal Power Plants form an integrated whole for the safe work execution at the Steam-Electric Power Stations and a valuable aid for Safety Technicians.
- **Special Safety Regulations for the operation of Mines**, approved by the competent Ministry, on the following topics:

At the Lignite Center of Western Macedonia:

- General Safety Regulation for the Lignite Center of Western Macedonia
- Special Safety Regulations (SSR) for Conveyors

- SSR for Electrically Powered Mine Machinery
- SSR for Self-propelled Mine Machines
- Special Safe Work Instructions for a Machine Shop
- SSR for Handling-Storage-Use of Petroleum Products

At Megalopolis Mines the following Special Safety Regulations:

- SSR for work in Mine Support Services
- SSR for the Main Mine Machinery
- SSR for Conveyors at the Lignite Center of Megalopolis
- SSR for Auxiliary Machinery-Vehicles at the Lignite Center of Megalopolis

**1.4. Additionally, the Directorate for Occupational Safety and Health has developed a framework of guidelines and regulations for the handling and prevention of accidents at Power Production Plants.**

**1.5. Written Occupational Risk Assessment (GEEK)** (or Occupational Risk Assessment Studies-MEEK) have been prepared for all Production Stations, Mines, Sales Stores and Offices. Each Written Occupational Risk Assessment is updated at regular intervals every five years at most, also monitoring changes in premises, activities and organizational structure.

**1.6. Emergency Response Plans (SAEK).** For each Service Unit, Emergency Response Plans have been prepared and regularly updated, with the designation of Emergency Response Teams, and the corresponding training and exercises are carried out.

**1.7. A Fire Safety Study** has been prepared at the Power Production Stations and which is checked and certified by the relevant Fire service, in accordance with the obligations of the Legislation.

**1.8. Training,** with cooperation of the relevant services, both in subject matter of work and in Safety and Health issues.

**1.9. Inspection System** approved by decisions of the Managing Director.

**1.10. Written reports** are prepared after inspections, internal and external ones.

**1.11. Special inspections at critical points** of the premises, which entail potential safety and fire safety hazards.

**1.12. SEVESO studies prepared** to deal with large-scale industrial accidents related to oil tanks wherever they exist.

## **2. TRAINING-INFORMATION ON MEASURES TO PREVENT ACCIDENTS IN MINES**

Safety Technicians of Units, especially high-risk units such as Mining and Production, regularly (twice a week) conduct training seminars/ briefings on Occupational Safety and Health issues mainly for technical staff.

In the last two years, due to the COVID-19 pandemic and the ban on training-briefings by physical presence, the above seminars were not implemented. During this period, however, repeated online briefings and training sessions were held, both for Safety Technicians and staff, on the one hand on the disease itself and its mutations and on the other hand on protection measures against the spread of the coronavirus within the mining areas (measures legislated by the State and included in the internal operational regulations).

In 2022, trainings for Safety Technicians (old and newly appointed) were and continue to be conducted by members of the OSH Department of PPC S.A., as well as on-site trainings for technical staff by the relevant Safety Technician.

### 3. ACCIDENT STATISTICS

At PPC S.A. all occupational accidents are systematically recorded, thus their development is monitored. Every year, detailed Accident Statistics are compiled by activity (Mining, Production, Commercial Activities and Support Services) and accident indicators (according to European Statistics on Accidents at Work-ESAW and as a total) are monitored. The annual Accident Statistics are sent to all staff and published on the internal information portal for employees.

Additionally, occupational accidents and the monitored indicators (indicators of accident severity and frequency) for the entire Enterprise (and not for the specific activities) are reflected in the annual Sustainable Development Report in addition to the general and specific information on the Enterprise's progress and actions. The Sustainable Development Report is available at PPC S.A. website via the following links:

<https://www.dei.gr/el/dei-omilos/viosimi-anaptiksi/ektheseis-viosimis-anaptyksis/ekthesi-viosimis-anaptyksis-2020/>

<https://www.dei.gr/en/ppc-group/sustainable-development/sustainability-reports/sustainability-report-2020/>

Below are data from the above Statistics for the accidents at the **Mining Units of Western Macedonia and Megalopolis**, for which the European Committee of Social Rights considered that insufficient data have been sent or submitted.

#### 3.1. [Accident data concerning the personnel of the Western Macedonia Lignite Center](#)

At the development table for the period 2003-2021 (see Annex-Table 1), the number of occupational accidents (of regular and temporary staff of the Lignite Center) per year, with emphasis given on fatal accidents, as well as a depiction of how the severity and frequency index of these accidents may vary.

2020 was the best of the last twenty years, in terms of the Accident Frequency Index for the Personnel of the Western Macedonia Lignite Center, which was at 3,6, whereas for 2021, it was at 6,3.

It is also positive that the absolute number of accidents was low (only 7 in total for 2020 and 13 for 2021), although the 70-75% reduction in active working hours compared to the previous five years, along with 2 to 3 accidents per year which resulted in long periods of absence for the victims, contributed to the observed increased rates of the Severity Index (241 and 375 respectively).

However, the high average biological and working age which directly affects the technical Personnel that works for many years in the opencast areas of the Mines and in the Maintenance Workshops of the fixed equipment should not be disregarded.

With respect to fatal accidents, it is very positive that in 6,5 years (since 7/3/2016), there has been not a single death of an employee as a result of an accident at the Western Macedonia Lignite Center.

### 3.2. [Data on accidents related to Megalopolis Mines personnel](#)

The accident evolution **table** for 2011 until September 2022 (see Annex-Table 2) shows the indicators of accident frequency and severity, as well as the days of absence.

We note that although the data provided refer to different time periods (2003-2021 for the Western Macedonia Lignite Center, 2011-2022 for the Megalopolis Mines), in each case, data not only for the two years under consideration, but also for the entire previous decade shall be included.

## 4. INTERNAL RULES AND INSTRUCTIONS OF PPC S.A. ON OSH ISSUES

Historically, a large number of internal instructions, posters, brochures and information material have been issued by PPC S.A. on OSH issues, with emphasis given on high-risk operations at Mines and Power Production Plants.

Indicatively, during **the last two years 2020-2021**, the following have been issued:

- Internal directive on the protection measures against the possible presence of hexavalent chromium in PPC Power Plants
- Internal Directive on the handling of medical oxygen cylinders (at the Medical Centers of Mines and Power Production Plants.

Also, more recently, (in **2022**) were issued:

- A poster with the current abbreviated hazard and precautionary statements and hazard pictograms with their meaning, in accordance with European Regulation EC 1272/2008 (CLP Regulation)
- A poster on heat stress during summer months, pursuant to relevant circulars of the Ministry of Health.

The above list is indicative and non-exhaustive. The above instructions, in the form of brochures, booklets, posters, electronic presentations, videos etc., have been presented to workers by various means (posted at workplaces, on PPC S.A internal information portal, distribution to employees and visitors etc.)

## 5. OTHER INTERNAL ACTIONS OF PPC S.A. FOR THE PROMOTION OF SAFETY AND HEALTH

### a. Medical Screening

The Preventive Medical Checkup has been systematically applied at PPC S.A. for years with emphasis given on PPC staff at the Lignite Centers (Mines) and the Power Production Plants: Thermal Power Plants, Hydroelectric Power plants and Island Power Stations. Particularly, in the last two years under discussion, the Preventive Medical Checkup continued at a slow pace, due to measures against pandemic and the risk of virus transmission to workers (Attendance at hospitals and other private centers and laboratories for medical examinations entailed infection risks).

The list of examinations conducted under the Preventive Medical Checkup is regularly reviewed. The current version has been in force since 2015 and examinations are given according to staff specialty and the Unit type. In 2022, the list was completed with further examinations as concerns the Attica Units and is gradually extended to other Units. It is noted that no occupational diseases have been detected from this inspection.

**b. Awareness-raising actions for COVID-19**

As regards information for coronavirus, many internal guidelines, videos, posters, press releases, have been issued and posted at the workplaces of all Units, including Power Production Plants and Mines. Webinars and occasionally in-person briefings of staff by Occupational Physicians have also been held. The abovementioned cover a variety of issues, including inter alia, vaccination, mask use, ventilation, safety distance etc.

**c. Important distinctions of PPC S.A. on issues of Occupational Safety and Health**

In 2022, the Enterprise won 1 gold, one silver and one bronze award at the Health and Safety Awards Competition for its Safety and Health actions, and in particular:

**Gold Award:** Evacuation plans for workplaces and PPC shops as regards employees and customers, with emphasis given on people with disabilities.

**Silver Award:** Organization of Psychosocial Support for Workers during Pandemic Conditions

**Bronze Award:** Establishment of a Network for COVID-19 incident handling by PPC S.A.

**d. Psychosocial Support Services in Mines**

As regards the intervention to improve the specific working conditions at **Mines**, the last three years' statistics (see Annex-Table 3) by the Psychosocial Support Sector of the OSH Directorate for the services provided (psychiatric assessment, social surveys, counseling, visits, psychological support sessions) are attached.

**e. Data from the Sustainable Development Report of PPC S.A. (2020, page 221)**

“PPC’s priority in terms of controlling the risks of accidents and occupational diseases is to develop safety education at work. The aim is to have the workers from all hierarchy levels, as well as those under a working relationship with the Enterprise, committed to the general objectives for accident prevention”.

In the context of risk prevention activities, particular attention is given to:

- the measurement of harmful factors (physical, chemical) at the working and wider environment (for 2020 measurements, see SDR pages 133,223)
- the detection, identification and safe management of hazardous waste (see SDR 2020, pages 165, 170-1, 174-5)
- the conduct of a preventive staff medical checkup, adapted for each group of workers (see SDR 2020, page 222)
- the assessment of the workers’ suitability as regards the job for which they are employed, on the basis of the preventive medical checkup results (see SDR 2020, page 222)
- the association of the inspection’s findings with each group’s specific working conditions (workplace, harmful agents to which the worker is exposed, etc.).

## **6. LIFE QUALITY ISSUES FOR STAFF**

### **A. Personnel Work Schedule**

In 2016, an improved shift schedule was adopted and implemented at the West Macedonia Mines, in line with the one followed at the Production Stations, in order to enhance work-life balance.

Specifically, since 01.08.2016, by the Company's initiative, the Western Macedonia Lignite Center Directorate held relevant consultations with the union representatives of the workers and the trade unions. The change of working hours, i.e. the rotating shift schedule on a 2-2-3 pattern, was proposed (see Annex-Table 4). After a pilot implementation period, all shift workers were asked to record their opinion on the individual badge card (Yes/No), and as a result, the proposed change was adopted by a large majority.

Experience to date has clearly shown the advantages of the new programme and it is considered by the workers themselves as the most acceptable one, both for their professional performance and for their social life, where they have regained the best possible balance.

The Mines of Megalopolis also follow a programme that takes into account the workers' rest needs and is similar to that of the Power Production Plants.

Indicatively, the monthly work schedule at Psathio and Marathoussa is sent, in which the rotation per month and shift is depicted in detail (see Annex – Tables 5 & 6).

#### **B. Special leaves (Compliance with EU Directive, national legislation and internal PPC S.A. regulation)**

By Law 4808/2021 (OGG 101/A'/19.6.2021) European Directive (EU)/2019/1158 on *work-life balance for parents and carers* was transposed in Chapter A, whereas in Chapter B the Greek State introduced *additional leaves for family protection*.

PPC has issued an internal directive (ΔΔΑΠ/Ε.Κ.135698/14425/10.9.2021) for the strict application of the above Law to its entire regular and temporary staff. Specifically, for workers under the PPC Staff Regulation, it is specified that the most favorable regulations apply henceforth a case-by-case basis: either the regulations previously in force in the Company or the new Law provisions. Therefore, **all previous facilitations** provided by the Company to its workers with regard to the possibility of granting special leaves were **maintained**, and **to these were added those recently established** by the State.

#### **c. Insurance for (Hyper-) Arduous-Unhealthy Occupations**

It is also noted that the technical staff at Power Production Plants and Mines is subject to the category of Arduous and Unhealthy Occupations depending on the activity performed. To this end, personal data inventories and certificates of employment and the rate of it shall be drawn up by the hierarchy and sent to the social security institution for approval. Inter alia, this implies an early retirement entitlement for those workers.

### 3. Collective Complaint 65/2001 “General federation of employees of the National Electric Power Corporation (GENOP-DEI) / Confederation of the Greek Civil Servants’ Trade Unions (ADEDY) v. Greece”

We refer to the previous (4<sup>th</sup> Simplified) Greek Report and would like to inform you that from the submission of the previous Report (February 2021) up-to-date, there are no legislative or other developments with regard to the issue under consideration (i.e., *reasonable period of notice before dismissal*).

However, it is worth mentioning as a positive development regarding the general legislative framework that **Article 65 “Exemption from the obligation to provide work after notice of termination”** of **Law 4808/2021 (OGG A’101/19-06-2021) “On Labour Protection-Establishment of the Independent Authority “Labour Inspectorate”- Ratification of Convention 190 of the International Labour Organization on the Elimination of Violence and Harassment in the World of Work – Ratification of Convention 187 of the International Labour Organization on the Framework for the Promotion of Safety and Health at Work – Transposition of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance, other provisions of the Ministry of Labour and Social Affairs and other urgent regulations”** (see also under CC111/2014 in greater detail) provides for the following:

“1. Upon notification of the employment contract termination, the employee shall be exempt by the employer to perform his/ her work, part-time or full-time.

In this case, the employee’s salary is paid in full until the expiry of the notice period and the employer has no obligation to accept the employee’s work.

2. if the employer exercises the right referred to in paragraph 1, the worker shall have the right to work for a different employer during the period of notice, without the outcome of the termination and the amount of the due compensation being affected”.

#### 4. Collective Complaint 66/2011 “General federation of employees of the National Electric Power Corporation (GENOP-DEI) / Confederation of the Greek Civil Servants’ Trade Unions (ADEDY) v. Greece”

##### Developments regarding article 4§1

As a follow up to the information given in the previous Report (4<sup>th</sup> Simplified Greek Report), we would like to inform you of the following:

**On 21.04.2022, Ministerial decision No.38866/2022** “Determination of the minimum salary and the minimum wage for the employees and the blue-collar workers throughout the country” (OGG B’2030/21-04-2022) **was issued**, by virtue of which, from 1<sup>st</sup> May 2022, **the statutory minimum salary and the statutory minimum daily wage**, for full-time employment, for employees and blue-collar workers throughout the country, **without age discrimination**, were set as follows:

**“(a) For employees, the minimum salary is set at seven hundred and thirteen euros (€713,00)**

**(b) For blue-collar workers, the minimum daily wage is set at thirty-one euros and eighty-five cents (€31,85)”**.

Furthermore, the latest National General Collective Labour Agreement (NGCLA) is the “National General Collective Labour Agreement 2022, validity extension of NGCLA 2021” ΠΚ15/30.6.2022 of the Ministry of Labour and Social Affairs and validity period from 1.1.2022 to 30.6.2023 according to Article 1 thereof.

##### Developments regarding articles 7§7 and 12§3

As regards protection of apprentices’ rights, please refer to all the information provided in detail under CC111/2014.

Moreover, we refer to our previous (4<sup>th</sup>) Report and we would like to remind you that:

In accordance with the legislation in force all young apprentices are covered by insurance for all risks (full insurance). Specifically, “apprentices are under the insurance scheme of the Electronic National Social Security Institution (e-EFKA) during the apprenticeship period, entitled to sickness benefits in kind and sickness benefits in cash and their insurance time can be counted for pension purposes”.



## 5. Collective Complaint 72/2011 “International Federation for Human Rights v. Greece”

### I. Municipality of Tanagra

In relation to the above relevant document (3), it is noted that the actions on behalf of the Municipality of Tanagra, as those described in the previous simplified Greek Report, have been continued. In particular, as regards the quality of drinking water, as has been emphasized in the past, the entire administrative district of the Municipality is supplied with water by the Athens Water Supply and Sewerage Company (EYDAP S.A.). Water quality is tested following continuous inspections, which are much more frequent than those stipulated by legislation. The results are posted on the official website of the Municipality, are sent to the Municipal Units’ offices, whereas citizens are informed by all possible means. In addition, the Department of Environment and Civil Protection of the Municipality already since 2017 and before the issuance of the ΝοΓ1δ/67322 (OGG 3282/19-9-2017) Joint Ministerial Decision, has integrated in all drinking water analyses, the measurement of total chromium and hexavalent chromium, although there is practically no cause for concern due to the water provenance. As concerns the water used for agricultural use, there are no recent data that lead to firm conclusions. According to a research by the Coordination Office for the Remediation of Environmental Damage (SYGAPEZ), via a number of research wells, the pollution is largely located in the upper aquifer, i.e. at shallow water intake points. Finally, the Department of Environment and Civil protection of the Municipality estimates that the local salinity problems observed are due to anthropogenic and not geological causes.

The most recent sampling in surface water in the Asopos River took place on 11/8/2017, 13/6/2018, 22/11/2018 and 30/10/2019 and 3/12/2020 (6-25). The results of the year 2020 show the problem’s restoration at the Mailis position. Specifically, while the concentrations at the Mailis pipeline were high (total chromium 2149mg/l, hexavalent chromium 1820 mg/l), the corresponding measurements at a point below this were low (total chromium 16 mg/l, hexavalent chromium 7 mg/l). This indicates that we have a localized pollution that is no longer diffused into the natural recipient. At other sites in the Asopos River, concentrations in chromium and organic load have been found at intervals outside the limits, however, a fact that was not observed in 2020 measurement. Our Agency estimates that the reason for these high concentrations is the release of pollution loads that is not continuous. The Municipality of Tanagra, via the competent Department of Environment, extensively informs all competent bodies (Ministry of Environment, Decentralized Administration of Thessaly-Central Greece, Region of Central Greece) both for the results of the tests in the Asopos surface water and in pipelines entering into it, as well as for the scientific conclusions that result from the above measurements.

The Municipality of Tanagra has been carrying out since April this year a project to upgrade the existing Wastewater Treatment Plant along with the connection of Plaka Delesi and Delesi settlements with the existing and operational plant. Under the contract, the estimated time of the project’s completion is two (2) years. After the completion of the project, the existing situation will further improve, due to better treatment of the

wastewater. In addition, the number of settlements connected to the plant will also increase.

As regards the scope of application of the 20488/2010 Joint Ministerial Decision, according to the Municipality of Tanagra, the environmental inspections at all enterprises operating in the area should be intensified and the results of the inspections conducted should be communicated. It is necessary to reinforce the bodies (Ministry of Environment and the Region) responsible for conducting environmental inspections with scientific staff.

Finally, the Municipality of Tanagra, via the competent Department of Environment, constantly monitors the state of the environment in the wider area of Asopos, firstly examines and secondly promotes any residents' complaints on environmental issues and in general, takes appropriate action where necessary to address the problems that arise.

## **II. Region of Central Greece (Sterea Ellada)**

The Region of Central Greece has taken the following actions:

### ***A) Environmental Inspections conducted by the Region of Central Greece (Sterea Ellada) in the Asopos catchment basin***

The industries are licensed in application of the provisions of the No.20488/19-5-2010 Joint Ministerial Decision for Asopos and its amendment by No.100079/21-1-2015 JMD.

Today, all industries have complied with the provisions of the No.20488/2010 JMD, either by improving their wastewater treatment system or by changing their wastewater management. Specifically, according to the records kept by our Agency, in the area of the Municipality of Tanagra, there are about 500 manufacturing enterprises (Craft industries and professional workshops). Fourteen (14) of these produce wastewater and currently dispose it in the Asopos River. All of them are under revised environmental terms in accordance with No.20488/2010 JMD.

With regard to the plants which have produced and continue to produce wastewater and disposed it underground in a septic tank, under the supervision of the competent environmental authority, the environmental terms have been revised and in compliance with No. 20488/2010 JMD underground disposal by the said plants was interrupted.

Nevertheless, the Region of Central Greece (Sterea Ellada) with the assistance of a Special Team to Monitor Environmental Quality (KEPPE-Boeotia) carries out systematic inspections at the industries of the Asopos river area and when infringements are detected, the legislation in force is applied, i.e. either by imposing a fine or recommending to the licensing authority the plants' shutdown. Since 2015, the competent services of the Region, in the framework of the planned inspections but also of the inspections following complaints, carried out about 470 inspections from 2015 to date which resulted in environmental violations. Specifically, out of the approximately 470 inspections, 19 involved fines for violation of environmental rules and the applicable environmental legislation.

It is clarified that there is no legal possibility for the Region to review permits issued by the Ministry of Environment. As regards waste water, the Ministry of Environment and Energy which is the competent authority for environmental licensing, confirms the implementation and compliance with the anti-pollution systems (A1). The Decentralized

Administration is responsible for (A2) anti-pollution systems. Within these enterprises, the Region's sole possibility and competence is the control of compliance with the environmental rules set by the competent authorities for the A1 and A2 environmental categories and the standard environmental commitments for B-category projects. The results of the inspections conducted in these industries are daily posted on the website of the Region of Central Greece (Sterea Ellada) and on DIAVGEIA and evaluated by its services.

**B) Investigation and control actions regarding the pollution of Asopos river by the Region of Central Greece (Sterea Ellada):**

The integrated strategic intervention plan of the Region (Integrated Territorial Investment of Asopos River Basin) includes a mixture of strategic interventions for the environmental rehabilitation of the area, such as the study on the delimitation of the Asopos riverbed, the pollution monitoring-recording and response, the creation of an Environment and Health Observatory in Oinofyta etc.

On the initiative of the Region of Central Greece (Sterea Ellada) and before the approval of the Integrated Territorial Investment of Asopos River Basin, the Environmental Observatory operated for two periods under programmatic contracts with the National Centre for Scientific Research "Demokritos" and cooperation with the Chemical Service of Livadia. The team was formed with engineers and healthcare supervisors, staff members from the relevant directorates of the Region of Central Greece (Sterea Ellada). The results have already been announced and are available and posted on the website of the Region of Central Greece (Sterea Ellada)

<https://pste.gov.gr/exipni-periferia/paratiritirio-perivallontos/#tab-id-4> .

Its reoperation together with the Health Observatory is currently organized. Specifically, the Region of Central Greece (Sterea Ellada) is preparing the submission of a project proposal entitled "Development and Operation of a Digital Observatory for Health, Environment and Preventive Interventions in the wider area of the Asopos River Basin" in order to be included and funded by the Operational Program "Central Greece (Sterea Ellada)" 2014-2021.

The action shall involve an intervention included in the Strategic and Operational Plan (Action Plan) for the wider Asopos River Basin area Urban, Social, Environmental and Business Revitalization and Rehabilitation. It concerns the development and operation of a Health and Environment Observatory in physical (surveys, studies, prevention actions etc.) and electronic form in the wider area of Oinofyta-Asopos of the Regional Unit of Boeotia in the Region of Central Greece (Sterea Ellada). The contribution of the Observatory aims at: a) recording and assessing the environmental burden of the area, b) adopting a complex set of policies for the prevention and promotion of public health, including the timely and accurate detection of environment-related health risks, as well as proposals for the establishment of more effective (and preventive) systems for the assessment, monitoring and management of these risks and c) formulating proposals to minimize environmental nuisance and improve health protection for residents and workers in the area. Indicatively, the following are included:

- Actions to investigate, monitor, evaluate the health profile of the local population and prevent for the risk assessment of the local population.
- Actions to codify the sources of pollution and ensure the environmental acquis.
- Development of ICT tools for systematic risk monitoring (environmental and health) and planning of prevention and remediation actions.
- Electronic/ digital provision of expertise and primary-secondary data to institutions, scientific community and citizens.
- Actions to raise awareness among the local population (including the broad public) on public health prevention and environmental protection.

The Integrated Territorial Investment of Asopos River Basin constitutes an Integrated Strategic Intervention Plan for the wider Asopos River Basin Urban, Social, Environmental and Business Regeneration and Rehabilitation. The Region of Central Greece (Sterea Ellada) is beneficiary of the following two important projects characterized as emblematic: the delimitation of the river Asopos in a 10 km section and the detection and identification of the sources of pollution and the polluters responsible, as well as the recommendation for remediation measures in the area.

The study for the project of the riverbed's delimitation and the Asopos flood protection has been completed and is in the final approval stage in order to be published in the Official Government Gazette. The exploratory and remediation study for the Asopos pollution is structured in two Subprojects-studies. The study of SUBPROJECT 1 has indicated the drilling of 24 boreholes (SUBPROJECT 2). The drillings of SUBPROJECT 2 have been completed and the results of the geotechnical investigations are still to be delivered and the entire study is to be submitted to the Agency.

This study, along with the creation of the biological treatment plant within the ongoing Rehabilitation Business Park and the other measures envisaged in the Integrated Territorial Investment of Asopos River Basin will contribute to the restoration and de-pollution of the area and will prevent further deterioration. As regards water measurements, it is noted that for surface water, analyses have already been conducted by the Environmental Observatory. For drinking water and irrigation, analyses are foreseen via the continuous operation of the Environmental Observatory. It should be clarified that we only test groundwater in the upper aquifer, i.e. at a depth of less than 50 meters where pollution has been detected.

### **III. Decentralized Administration of Thessaly-central Greece (Sterea Ellada)**

The Directorate for Environment & Spatial Planning of the Decentralized Administration of Thessaly-Central Greece within the framework of its responsibilities has issued decisions approving environmental terms related to industrial activities whose waste water disposal takes place within the Asopos river basin in accordance with the provisions of the No.20488/2010 (OGG B'749) Joint Ministerial Decision "Determination of quality environmental standards in the Asopos river and Emission Limit Value for liquid industrial waste emissions of the Asopos water catchment area".

### **Coordinating Office for the Response to Environmental Damages (SYGAPEZ)**

The Coordinating Office for the Response to Environmental Damages (SYGAPEZ) continues to monitor the implementation of a restoration program of the underground aquifer, within a metal industry field in Oinophyta, Voiotia Province (Asopos River Basin), due to the detection of contamination of the groundwater with hexavalent chromium (Cr+6). SYGAPEZ also monitors the implementation of remedial measures, in cases that they have been subject to an environmental liability regime, according to the P.D. 148/2009, in cooperation with the relevant Decentralized Administration of Central Greece - Thessaly (Regional Committee for the Response to Environmental Damage of Central Greece).

### **Directorate for the Management and Protection of the Water Environment (Ministry of Environment and Energy)**

After the institution of the Programme of Measures of the 1st Revision of the River Basin Management Plan (RBMP) of the Water Division (RD) of Eastern Central Greece (ELo7), which was drawn up in accordance with the requirements and specifications of Directive 2000/60/EC (OGG4673/B/2017), no new measures have been instituted by the General Secretariat of Natural Environment and Water of the Ministry of Environment and Energy. In the current period, the 2nd Revision of the SDLAP is being prepared, which is expected to be completed by the end of 2023. In this context, the implementation of the Programme of Measures will be evaluated, and with the approval of the 2nd Revision of the SDLAP, the revised Programme of Measures will be institutionalized.

## 6. Collective Complaint 111/2014 “General Confederation of Greek Workers (GSEE) v. Greece”

[Changes / Improvements regarding article 1§2 \(The right to work – protect the right of the worker to earn his living in an occupation\) & and article 4§1 \(The right to a fair remuneration – decent standard of living\) \(See also CC 66/2011\)](#)

The latest National General Collective Labour Agreement (NGCLA) is the “National General Collective Labour Agreement 2022, validity extension of NGCLA 2021” ΠΚ15/30.6.2022 of the Ministry of Labour and Social Affairs and validity period from 1.1.2022 to 30.6.2023 according to Article 1 thereof.

### [As regards article 1 para.2 of the ESC:](#)

Article 57 “Provision of additional work by part-time workers-Amendment of Article 38(11) of Law 1892/1990” of **Law 4808/2021** (OGG A’101/19-06-2021) “On Labour Protection-Establishment of the Independent Authority “Labour Inspectorate”- Ratification of Convention 190 of the International Labour Organization on the Elimination of Violence and Harassment in the World of Work – Ratification of Convention 187 of the International Labour Organization on the Framework for the Promotion of Safety and Health at Work – Transposition of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance, other provisions of the Ministry of Labour and Social Affairs and other urgent regulations” stipulates the following: “A new second subparagraph is added to paragraph 11 of Article 38 of Law 1892/1990 (A’101) and paragraph 11 is amended as follows:

11. If there is a need for additional work beyond the agreed one, the workers are obliged to provide it, if they are able to do so and their refusal is not contrary to good faith. The additional work may be provided, if the worker agrees and at hours which are not consecutive to the agreed hours of the same day, subject to the provisions on daily rest. If work is provided beyond the agreed one, **the part-time worker is entitled to a corresponding remuneration, increased by twelve percent (12%) of the agreed remuneration for each additional working hour provided.** The part-time worker may refuse to provide work beyond the agreed one, when the additional work is carried out as usual. In any case, such additional work may be carried out at most until the comparable worker’s full daily working hours have been completed.”

The above provision allows part-time workers to provide, if they agree, work beyond the agreed one and at hours that are not consecutive with their working hours, in any case at most until the comparable worker’s full daily working hours have been completed. It should be noted that, under the current provision, the worker is paid for each additional working hour provided by a 12% increase on the agreed remuneration.

### [As regards article 4 para.1 of the ESC:](#)

Following the completion of the economic adjustment program and Article 103 of Law 4172/2013 (OGG A’167/23-07-2013) as in force, a new system of statutory minimum salary and statutory minimum daily wage setting was introduced, after wide consultation. This article shall confer legislative authority to the Minister of Labour to issue a salary determination Decision with the consent of the Ministerial Cabinet.

The said procedure started for the first time on September 2018 and it was completed with the issuance of the No.4241/127/30.1.2019 (B'173) Ministerial Decision, on the basis of which the statutory minimum salary and the statutory minimum daily wage for full-time employment were set since 1.2.2019 for employees and blue-collar workers throughout the country, without age discrimination.

Similarly, by the same procedure, the statutory minimum salary and the statutory minimum daily wage for full-time employment, for employees and blue-collar workers throughout the country under a private law dependent employment relationship, without age discrimination, were set **since 1<sup>st</sup> January 2022**, in accordance with the provisions of No.107675/2021 (OGG B'6263) Ministerial Decision.

Today, **already from 1<sup>st</sup> May 2022** the statutory minimum salary and the statutory minimum daily wage, according to the No.38866/21.4.2022 (B'2030) Ministerial Decision, are as follows:

- a) For employees, the minimum salary is set at **seven hundred and thirteen euros (€713.00)**
- b) For blue-collar workers, the minimum daily wage is set at **thirty-one euros and eighty-five cents (€31,85)**

#### Changes / Improvements as regards Article 2§1 (The right to just conditions of work)

The provisions on time limits are mandatory and define the minimum rest period on a daily and weekly basis. The texts of Collective Labour Regulations (CLAs and AAs) can only improve the minimum relevant conditions laid down by Law (Article 7§3 of Law 1876/1990).

Combining the provisions of Article 6 of the 14-2-1984 NGCLA and Article 6 of the 26-02-1975 NGCLA, ratified by article of Law 133/75 as well as the provision of **paragraph 1 of Article 55 of Law 4808/2021 (A'101)**, it appears that:

The conventional (collective) weekly working hours of employees are set at 40 hours per week. These hours are spread over 5 days under a five-day working week (40:5=8 hours per day) or 6 days under a six-day working week (40:6=6, 40 hours per day).

If a five-day working week scheme is applied, **the employer must grant two days of compensatory rest (day off) per week**, one of which must in principle coincide with Sunday (combination of the provisions of Articles 1 and 3 of Royal Decree 748/1966 and Article 5 of the Presidential Decree 88/00 as replaced by Article 3 of Presidential Decree 76/2005 and in force).

Similarly, where a six-day working week scheme is applied, the employer must grant one day of compensatory rest (day off) per week, which must in principle coincide with Sunday, unless a day other than Sunday is provided for by the relevant legislation as a weekly rest day”.

Moreover, according to **Article 58 of Law 4808/2021** that amended Article 4 of Law 2874/2000,

“1. In enterprises where contractual working hours up to forty (40) hours per week are applied, the worker may work five (5) additional hours per week at the employer’s discretion (overwork). These hours of overwork (41<sup>st</sup>, 42<sup>nd</sup>, 43<sup>rd</sup>, 44<sup>th</sup>, 45<sup>th</sup> hour) are paid at the hourly rate increased by twenty percent (20%) and they are not counted as part of the overtime limits allowed under the applicable provisions. For workers to whom a six (6) working day week scheme is applied, in accordance with the previous subparagraph, overwork shall amount to eight (8) hours per week (from 41<sup>st</sup> to 48<sup>th</sup> hour).

2. **The employee's work in excess of forty-five hours per week at the enterprises referred to in paragraph 1 shall be considered overtime work as to all legal consequences, formalities and approval procedures.** For worker to whom a six (6) working day week scheme is applied, overtime employment is work in excess of forty-eight (48) hours per week. In any case, the regulations on statutory daily working hours shall remain in force.
3. **Employees working overtime up to three (3) hours per day for each hour of legal overtime and up to the completion of one hundred and fifty (150) hours per year are entitled to remuneration equal to the hourly rate increased by forty percent (40%).**
4. **Each overtime hour for which the statutory formalities and approval procedures are not respected shall henceforth be considered as illegal overtime.**
5. **The employee shall be entitled to compensation equal to the hourly rate paid, increased by one hundred and twenty percent (120%) for each hour of illegal overtime”.**

In view of the above, it is clear that the daily working time ceiling including overwork and overtime employment, may in no case exceed 12 hours per five-day period and 11 hours per six-day period. Similarly, on a weekly basis, the maximum limits may not exceed 60 hours per five-day period and 66 hours per six-day period. These limits are subject to compliance with the maximum limit of 48 hours per week on average over a four-month period, including overwork and overtime employment.

[Changes/ Improvements as regards Article 4§4 \(Right to a fair remuneration-reasonable period of notice for termination of employment\) {see CC65/2011}](#)

We refer to CC65/2011 and note the following:

**Article 65** “Exemption from the obligation to provide work after notice of termination” of **Law 4808/2021 (A'101)** provides for the following:

“1. Upon notification of the employment contract termination, the employee shall be exempt by the employer to perform his/ her work, part-time or full-time.

In this case, the employee's salary is paid in full until the expiry of the notice period and the employer has no obligation to accept the employee's work.

2. if the employer exercises the right referred to in paragraph 1, the worker shall have the right to work for a different employer during the period of notice, without the outcome of the termination and the amount of the due compensation being affected”.

[Changes/ Improvements as regards Article 7§5 \(The right of children and young persons to protection – the right of young workers to a fair wage\)](#)

[Changes / Improvements as regards Article 7§7 \(The right of children and young persons to protection- entitlement to annual holiday with pay\)](#)

In December 2020, **Law 4763/2020** was passed: “National System of Vocational Education, Training and Lifelong Learning, transposition into Greek law of Directive (EU) 2018/958 of the European Parliament and of the Council of 28 June 2018 on proportionality control before the adoption of new regulation of professions (EU L 173), ratification of the Agreement between the Government of the Hellenic Republic and the Government of the Federal Republic of Germany on the Hellenic-German Youth Foundation and other provisions (A'254/21.12.2020). This law attempts



an overall restructure and upgrade of a critical sector of education, with a systemic role in the development dynamics of the economy and the creation of new opportunities for pupils, students and workers.

According to Article 2 of the above law, as “Apprenticeship” are defined the vocational education and training programmes which: a) combine learning in Education or Training Institutions with actual work-based learning in private or public and wider public sector workplaces at least fifty percent (50%), b) lead to recognized professional qualifications. The Apprenticeship program is carried out by the Apprenticeship Vocational Education Schools of the Public Employment Service (DYPA), by the Vocational Training Institutes and the Post-Secondary Year-Apprenticeship Class.

#### A. Apprenticeship Vocational Education Schools - Experimental Vocational Apprenticeship Schools of DYPA<sup>3</sup>

Article 9 of Law 4763/2020 stipulates that post-secondary vocational education and training, level three (3) according to the National Qualification Framework, is provided by the Vocational Training Schools and **Apprenticeship Vocational Education Schools of OAED (now DYPA)**. The purpose of the above schools is to provide initial vocational education and training services to graduates with a compulsory education certificate or its equivalent, to deal with school drop-out, to upgrade basic skills for holders of compulsory education certificates or their equivalents and to integrate them into the labour market. In particular, the Apprenticeship Vocational Education Schools of OAED (now DYPA) apply the dual system, which combines theory-based and laboratory-based training in the classroom with workplace apprenticeship in private and public sector enterprises. Graduates of the Vocational Training Schools are granted a Diploma of Vocational Education and Training, level three (3) after certification.

According to the article of the 86899/5-11-2021 Joint Ministerial Decision “*Determination of compensation for apprentices of the Apprenticeship Vocational Education Schools of OAED of Law 4763/2020 (B’5164)*”, **the compensation for the apprentices of the Apprenticeship Vocational Education Schools of OAED (now DYPA) is set at a rate of seventy-five percent (75%) of the statutory, legal, minimum daily wage of the unskilled worker as in force each time<sup>4</sup>**. This compensation is paid for each day of the “workplace learning programme” implemented in

<sup>3</sup>It is noted that the Apprenticeship Vocational Schools of DYPA “were re-established” under the 49718/13-7-2021 Joint Ministerial Decision “Conversion of the OAED Apprenticeship Vocational Schools according to Law 3475/2006 (A’146) to Vocational Schools of OAED Apprenticeship according to Law 4763/2020 (A’254)” (B’3078). The Experimental Vocation Schools of DYPA were established under the 82555/25-10-2021 Joint Ministerial Decision “Establishment and Operation of seven (7) Experimental Vocational Schools of OAED Apprenticeship in the tourism and hospitality sector (B’4959).

<sup>4</sup> It is noted that according to the 43069/10-5-2022 Joint Ministerial Decision “Subsidy of the Workplace Learning Programme for apprentices of the Apprenticeship Vocational Schools of DYPA of Law 4763/2020, who are employed in public sector bodies, in local self-government organizations (OTA), in private enterprises or holdings, in cooperatives, in unions during 2022” (B’2295), the workplace learning programme is subsidized by DYPA. Specifically, the subsidy of €16.54 for each day of the workplace learning programme is given to the apprentice equal to €16.54 per day of the workplace learning programme.

private, public and wider public sector organizations. Apprentices of the OAED Apprenticeship Vocational Education Schools are under the insurance scheme of the Electronic National Social Security Institution (e-EFKA) during the apprenticeship period, entitled to sickness benefits in kind and sickness benefits in cash and their insurance time can be counted for pension purposes. For social security contributions, Article 3 (1c) of Law 2335/1995 (A'185) is applied, in which contributions are calculated on the basis of half of the contributions actually paid<sup>5</sup>.

At the same time, in accordance with Article 38 of the 102791/14-12-2021 Joint Ministerial Decision “Preparation of the Rules of Operation for the Vocational Education Schools of OAED” (B'5832), **the apprentice’s daily working time is set at six (6) hours**. The apprentice’s weekly working time may not be less than twenty-four (24) hours corresponding to four (4) days or exceed thirty (30) hours per week spread over five (5) days, regardless of the apprentice’s age.

According to the article of the 37169/18-4-2022 Joint Ministerial Decision “Determination of compensation for apprentices of the Experimental Vocational Apprenticeship Schools of DYPA in the tourism and hospitality sector (B'1559), **the compensation for the apprentices of the Experimental Vocational Apprenticeship Schools of DYPA** in the tourism and hospitality sector **is set at eighty percent (80%)**<sup>6</sup> of the statutory, legal, minimum daily wage of the unskilled worker as in force each time. Article 5 of the 32134/5-4-2022 Joint Ministerial Decision “Regulation of Operation for the Experimental Vocational Apprenticeship Schools of OAED in the tourism and hospitality sector stipulates that the “Workplace Learning Program” takes place each year during May- October, **has a duration of forty (40) hours per week, spread over five (5) days per week**, and applies to both classes A' and B'.

## **B. Post-secondary Apprenticeship Year under the responsibility of the Ministry of Education and Religious Affairs**

According to Article 35 of Law 4763/2020, the purpose of the Post-secondary School year - Apprenticeship Class is the following:

- a) providing initial vocational training services to graduates of non-compulsory secondary vocational education, as well as to those with equivalent certificates, having a basic level of knowledge, skills and abilities,
- b) upgrading professional qualifications of graduates of non compulsory secondary vocational education, through a learning pathway that deploys all existing professional knowledge, skills and abilities and
- c) further enhancing opportunities for the integration of non-compulsory secondary vocational education graduates into the labour market, via the acquisition of work experience using the apprenticeship methodology.

The Post-secondary Year-Apprenticeship Class is optional, falls within the post-secondary vocational training and constitutes an educational pathway, the completion of which leads to a level five (5) title of the National System of Vocational Education and Training, following successful certification examinations (ESEEK). During the Post-secondary year – Apprenticeship

<sup>5</sup> According to paragraph 7(b) of Article 11 of Law 4763/2020 as amended by Article 211 of Law 4823/2021 (A'136)

<sup>6</sup> This amount shall be paid entirely by the employer.

Class, the apprenticeship methodology is applied which includes: a) Apprenticeship involving workplace training at a minimum of fifty percent (50%) of the total duration and b) laboratory courses of specialization, which are carried out in a School Laboratory of Vocational Senior High School (EPAL) or Vocational Training School. The responsibility for the implementation of the Post-secondary Year – Apprenticeship Class falls upon EPAL.

The workplace Learning Programme with duration of **eight (8) hours per day** and the workplace learning period may **take place from 1<sup>st</sup> October to 31<sup>st</sup> August of each year**. The program is considered complete when the hours of the specialty laboratory course and the workplace learning days as those specified in the Training Guide for each specialty are fulfilled. The distribution between laboratory course and workplace learning programme is defined in the Training Guide for each specialty.

According to the ΦB7/121875/K3/2021 Joint Ministerial Decision “*Subsidy for Apprentices of the Secondary School Year – Apprenticeship Class*” (B’4531) **the compensation rate for apprentices of the Secondary School Year - Apprenticeship Class is set at ninety-five percent (95%) of the statutory, legal minimum daily wage of the unskilled worker**<sup>7</sup>. During the period of the “Workplace Learning Programme” apprentices are entitled to sickness benefits in kind and sickness benefits in cash. Thus, their insurance period is counted for pension purposes, since contributions are paid for the respective main and supplementary pension schemes.

### C. Vocational Training Institutes of the Ministry of Education and Religious Affairs - Apprenticeship Programme

In accordance with Article 27 of Law 4763/2020, IEK trainees may pursue the practical training or apprenticeship within natural persons, public law legal bodies, private law legal bodies, public services, local self-government organizations of first and second degree and enterprises under the terms and conditions of the present, under the responsibility of the IEK they attend.

Additionally, according to the 17004/K5/15-2-2022 Joint Ministerial Decision “*Compensation of IEK trainees under the responsibility of the Ministry of Education and Religious Affairs who pursue a workplace Learning Programme*” (B’800), the apprenticeship of IEK trainees under the responsibility of the Ministry of Education and Religious Affairs combine learning at IEK with work-based learning at workplaces of the private or public and wider public sector. The Workplace Learning programme covers at least fifty percent (50%) of the duration of studies at IEK. The apprenticeship of the IEK trainees under the responsibility of the Ministry of Education and Religious Affairs is in accordance with the provisions of the Training Guide of the specialty. **The rate of compensation for IEK trainees-apprentices under the responsibility of the Ministry of Education and Religious Affairs is set at ninety five percent (95%) of the statutory legal**

---

<sup>7</sup> According to the ΦB7/121875/K3/2021 Joint Ministerial Decision “*Subsidy for Students of the Post- Secondary School Year-Apprenticeship Class*” (B’4531), the compensation shall be subsidized by the Ministry of Education and Religious Affairs, via the NSRF Executive Structure and paid by the Special Account to the apprentices while the statutory social security contributions are paid on a monthly basis by the employer who runs the “Workplace Learning Programme” of the Post-Secondary Year-Apprenticeship Class.

**minimum daily wage of an unskilled worker**<sup>8</sup> as defined by the Ministry of Labour and Social Affairs, for each day of participation in the “Workplace Learning Programme”. For the insurance of the apprentices - IEK trainees under the responsibility of the Ministry of Education and Religious Affairs, the social security contributions of the former IKA-ETAM are borne and paid monthly by the employer.

The above social security contributions are based on the apprentices’ earnings pursuant to paragraph 1(c) of Article 3 of Law 2335/1995 (A’ 185).

[Changes/ Improvements with regard to Article 3 of the Additional Protocol \(Right to determination and improvement of working conditions and working environment in the undertaking\)](#)

We refer to the previous relevant Greek report (*4<sup>th</sup> Simplified Greek Report on the implementation of the European Social Charter*).

---

<sup>8</sup> According to the 17004/K5/15-2-2022 Joint Ministerial Decision “Compensation for IEK trainees under the responsibility of the Ministry of Education and Religious Affairs who are participating in a workplace Learning Programme” (B’800), the compensation is subsidized by the Ministry of Education and Religious Affairs via the NSRF Executive Structure and paid to the IEK (Vocational Training Institutes) trainees under the responsibility of the Ministry of Education and Religious Affairs by the Special Account, whereas the legal social security contributions are paid monthly by the employer who runs the “Workplace Learning Programme”.

## 7. Collective Complaint 131/2016 “European Group of University Women (UWE) v. Greece”

### I. Legal framework for Equal Treatment in Employment

The general principle of equality is constitutionally established together with the right to equal pay for work of equal value<sup>9</sup>.

By virtue of **Law 3896/2010** on the «Implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation – Harmonizing current legislation with Directive 2006/54/EC of the European Parliament and of the Council, of 5 July 2006 and other relevant provisions» a special framework was created for the implementation of the principle of equal opportunities and equal treatment of men and women in employment and occupation.

A synergy is sought among all competent institutional mechanisms of the State and their cooperation with social partners, NGOs and undertakings, in order to tackle in practice the lack of equality on the grounds of sex in the labour market that hinders the participation of women in employment and increases thus female unemployment rates. The law aims at encouraging changes (proactive legislation) by establishing a network of provisions that ensure the effective implementation of the principle, by defining the competent body that will examine complaints related to its violation and by means of a system of extended legal protection together with adequate and preventive sanctions.

The provisions of the said law have a wide scope of application that covers: persons employed or candidates to be employed in the Public and broader public sector as well as the private sector, under any working relationship or form of employment, including works contract and on salaried assignment basis, irrespective of the nature of services provided, but also freelance professionals, those in vocational training, or candidates for vocational training of any type and form. The law covers access to employment and recruitment conditions, prohibiting any form of direct or indirect discrimination on the grounds of sex or marital status, regarding the conditions of access to salaried or non-salaried employment or in general to professional life, including selection criteria and recruitment conditions, irrespective of branch of activity and at all levels of occupational hierarchy.

The law defines the concepts of direct and indirect discrimination on the grounds of sex, and of sexual harassment, pay and occupational social security schemes<sup>10</sup>. The said law includes an explicit prohibition of any form of direct or indirect discrimination on the grounds of sex, especially in terms of marital status. Harassment, sexual harassment, as well as any less favorable treatment because of tolerance to or rejection of such behavior, constitute discrimination on the grounds of sex and are prohibited.

---

<sup>9</sup> Article 4, para1, articles 2 and 22, para1 of the Constitution establish the general principle of equality and the right to equal pay for work of equal value.

<sup>10</sup> See article 2 of Law3896/2010

Regarding the issue of equal pay of men and women, the content of the rule of equal pay of men and women is enriched, in compliance with article 22, para1 section b' of the Greek Constitution, article 4 of Directive 2006/54/EC, and the International Labour Law (ILC 100), and stipulates that: «Men and women are entitled to equal pay for similar work and for work of equal value»<sup>11</sup>.

Furthermore, the principle of equal pay is also furthered by virtue of other provisions that stipulate the following:

«2. a) Where an occupational classification system is used to determine wages, such system should be based on common criteria for male and female workers and should exclude discrimination on the grounds of sex.

b) When designing and implementing staff appraisal systems related to their pay progression, the principle of equal treatment should be respected and discrimination on the grounds of sex or marital status should not be permitted»<sup>12</sup>

With the above mentioned regulation the use of occupational classification and staff appraisal systems is not enforced on enterprises to determine wages. However, in cases where enterprises apply such systems, they should respect the principle of equal treatment of men and women and not allow discrimination on the grounds of sex in pay.

Regarding access to employment, by virtue of the above mentioned law, any form of direct or indirect discrimination is prohibited on the grounds of sex or marital status, regarding the conditions of access to salaried or non-salaried employment or in general to professional life, including selection criteria and recruitment conditions, irrespective of branch of activity and at all levels of occupational hierarchy<sup>13</sup>. Moreover, it is prohibited to make any reference to gender or marital status or the use of criteria and facts that lead to direct or indirect discrimination on the grounds of sex, in accordance with the definitions in article 2, in publications, notices, advertisements, public calls, circulars and regulations, concerning selection of persons for vacant posts, provision of education or vocational training or occupational leaves.

Moreover, any form of direct or indirect discrimination is explicitly prohibited on the grounds of sex or marital status of the worker with regard to employment terms and conditions, promotions, and planning and implementation of staff appraisal systems<sup>14</sup>.

More specifically, under Law 3896/2010, the national legislation was adapted to the provisions of Directive 2006/54/EC. And an attempt was made to establish a single clear and legislative framework harmonized with the above Directive for the application of the principle of equal treatment of men and women in matters of work and employment in the private and public sector.

---

<sup>11</sup> See article 4 para1 of Law3896/2010

<sup>12</sup> See article 4 para2 of Law3896/2010

<sup>13</sup> See article11 para1 and 2 of Law3896/2010

<sup>14</sup> See aritcle12 of Law3896/2010

Article 3 of Law 3896/2010 provides for the principle of equal treatment and the prohibition of any discrimination on grounds of gender, whereas Article 4 of the same law enriches, in terms of content, the rule of equal pay for men and women, in accordance with subparagraph b' of paragraph 1 of Article 22 of the Greek Constitution, Article 4 of the Directive, as well as international labour law (ILC100). Thus, according to this article, men and women are entitled to equal pay for work of equal value.

According to Article 25 of Law 3896/2010, the Ombudsman is the national body for monitoring and promoting the implementation of the principle of equal opportunities and equal treatment of men and women in the private and public sector as regards: a) access to employment including career advancement and vocational training including training with the purpose of employment, b) the terms and conditions of employment including remuneration and c) the occupational social security schemes, in compliance with Article 20 of Directive 2006/54/EC and in accordance with the latest amendment of the Ombudsman's statute (Law 3094/2003), by the provisions of Articles 18, 19 and 20 of Law 4443/2016.

The Ombudsman (which according to Article 25 of Law 3896/2010) is the national body for monitoring and promoting the implementation of the principle of equal opportunities and equal treatment of men and women in the private and public sector on issues related to work and employment) and the Labour Inspectorate cooperate closely in order to effectively detect infringing undertakings on gender equality issues. The cooperation between the two bodies is based on Article 25 of Law 3896/10, paragraph 10 which provides that the Ombudsman shall forward its findings to the Labour Inspectorate and if a gender-based discrimination has been detected, the latter shall impose the relevant administrative sanctions based on the Ombudsman's findings.

Subsequently, Article 2(g) of Law 3996/2011 stipulates that the Labour Inspectorate *"...monitors the implementation of the principle of equal opportunities and equal treatment of men and women in work and employment and especially of Law 3896/2010 (A'207)"*, whereas under Law 4443/2016, SEPE in case of unequal treatment based on gender, may impose administrative sanctions ranging from one thousand (1000) to five thousand (5000) euros. Administrative sanctions are imposed *at any stage of access to work and employment when concluding or refusing to conclude an employment relationship or during its duration, operation, progression or termination (Article 11, paragraph 2)* in which there is discrimination encouraged by the undertaking *"based on the grounds of race, colour, national or ethnic origin, descent, religious or other beliefs, disability or chronic illness, age, marital or social status, sexual orientation, identity or gender characteristics"*.

It follows from the above that the Ombudsman and the Labour Inspectorate act in a coordinated, independent and complementary manner to combat gender discrimination at all stages of the complaints' examination, in case such an infringement is reported or found by the Labour Inspectors.

The cooperation of the two bodies has brought satisfactory results in terms of both detecting unequal treatment and imposing direct sanctions against infringing undertakings.

Indicatively, in the years 2019-2021, seven (7) complaints on issues of direct gender discrimination were filed with the local Labour Inspectorate departments, of which two (2)

cases were resolved by the Labour Inspectors, three (3) cases were forwarded to the Ombudsman and two (2) were referred to the courts.

Also, by virtue of Law 4443/2016, that replaced Law 3304/2005, Directives 2000/43/EC<sup>15</sup>, 2000/78/EC<sup>16</sup> and 2014/54/EU<sup>17</sup> are transposed into our national law.

By virtue of this law, the current legislative framework is improved and enhanced for the implementation of the principle of equal treatment and the prohibition of discrimination in employment and occupation in general. To this end, a broader scope of application is developed for the principle of equal treatment by introducing new grounds of discrimination and the Ombudsman is assigned with the task of monitoring the implementation of the principle of equal treatment in a uniform manner for the public, the broader public and the private sector.

In any case, it should be noted that Laws 3896/2010 and 4443/2016 provide for important institutional tools to combat discriminatory treatment at the workplace, such as the reversal of the burden of proof<sup>18</sup>, the protection against victimization<sup>19</sup> and the obligation to provide information and data<sup>20</sup>:

It is worth mentioning that Greece has also ratified the Council of Europe *Convention for the Prevention and Combating of Violence against Women and Domestic Violence*<sup>21</sup>, with a view to further enhancing the protection of women.

---

<sup>15</sup> Directive 2000/43/EC « implementing the principle of equal treatment between persons irrespective of racial or ethnic origin»

<sup>16</sup> Directive 2000/78/EC on «equal treatment between persons irrespective of religion or belief, disability, age or sexual orientation, in employment and occupation»

<sup>17</sup> Directive «on measures facilitating the exercise of rights conferred on workers in the context of freedom of movement for workers»

<sup>18</sup> «The defendant» or the other party or the administrative authority bears the burden of proof before a court or other competent authority, that there was no violation of the principle of equal treatment. This tool, i.e., the reversal of the burden of proof is systematically used by the Ombudsman and has contributed to a great extent to the familiarization of inspected employers, (undertakings, bodies, services) with its application with positive results.

<sup>19</sup> Under article 14 of Law 3896/2010 and article 10 of Law 4443/2016 termination of the employment relationship is prohibited, and the unfavorable treatment of a person in general when it occurs as a counter measure to the termination or to a worker's request for the provision of legal protection in order to ensure compliance with the principle of equal treatment. Moreover, any unfavorable treatment of a worker who protested or made a complaint about discriminatory treatment is prohibited.

<sup>20</sup> Article 26 of Law 3896/2010 provides for a) the obligation of trade union organizations to inform their members about the regulations of this law, b) the obligation of employers to facilitate such information and take all necessary measures to prevent discrimination as well as the obligation to regularly provide data and information about the current situation of workers and the measures that they intend to undertake to further the principle of equal treatment and c) the obligation of the Ministry's services to provide information to trade union organizations and workers individually on the application of the law on equal treatment of men and women.

<sup>21</sup> Law 4531/2018 (OGG 62 A'/05-04-2018)



Finally, under the new Law 4808/2021 (OGG 101 A'/ 19-6-2021) in its articles 2 to 23 (PART II) and following the ratification of the International Labour Convention 190 “For the elimination of violence and harassment in the world of work” (PART I), a coherent and modern framework is established to prevent, address and combat forms of behavior such as violence and harassment, contributing to a working environment that shall respect, promote and safeguard the right of every person to a world of work without violence and harassment (Article 2). In Article 4 of the said Law, an explicit and stand-alone prohibition (albeit dissociated from the concept of discrimination) of any form of violence and harassment arising during work (mobbing) or being related to it, -including gender-based violence and harassment and sexual harassment- is established for the first time in national law.

According to Articles 5-11 of Law 4808/2021 the employers are obliged to take specific measures to prevent and deal with violence and harassment at work, not to tolerate violence and harassment when they become complaint recipients and are required to deal with complaints, to provide accessible information and training on the risks, prevention, protection and obligations of those involved and (in undertakings with more than 20 employees) to develop relevant policies (Articles 9, 10 & 11). Under Article 17 of Law 4808/ 2021, the Labour Inspectorate’s competence in relation to incidents of violence and harassment is extended in order to provide increased protection guarantees to the affected persons as referred to in Article 3 of Law 4808/2021 and to ensure that all persons liable comply with their legal obligations. Thus, in order to monitor the employers’ compliance with their above obligations, the Labour Inspectorate shall act in a preventive stage as well, irrespective of the submission of a relevant application. However, in order to monitor the application of Articles 4, 12 and 13, the Labour Inspectorate shall only act upon the submission of an application for the resolution of a labour dispute by the persons affected as referred to in Article 3. Article 18 of the Law also provides for a special procedure for labour disputes before the Labour Inspectorate. The said procedure refers to the handling of formal complaints submitted to the Labour Inspectorate for violation of the provisions on the prohibition of violence and harassment at work. The latter was also specified by the adoption of Decision 101269/2021 of the Minister of Labour and Social Affairs (OGG 5978B'/20-12-2021) “Regulation of issues relating to the procedure, the appearance of parties and the evidence before the SEPE for incidents of violence and harassment pursuant to Article 18 of law 4808/2021 (A' 101)”. Thus, the Labour Inspectorate is enhanced in terms of organization and also by the establishment of an Independent Department for monitoring incidents of workplace violence and harassment.

As regards the under-representation of women in positions of responsibility, there must either be a complaint or a relevant legislative framework so that the Labour Inspectorate can detect such discrimination.

However, given the current data available and the existing legislative framework, no cases of under-representation of women in positions of responsibility in the private sector have been identified or reported by the local Inspectorates.

## II. **Actions of the General Secretariat for Demography, Family Policy and Gender Equality**

The gender pay gap is tackled by the Greek government by adopting a coherent framework of legislative measures and political actions, which aim at the balanced participation of women and men in the workplace and at tackling discrimination in the field of employment (elimination of gender stereotypes and creation of appropriate/inclusive working conditions for women and men).

Find below a detailed reference to the National Action Plan for Gender Equality, which is the main policy tool, and to the recent legislative measures and EU-funded programs that contribute to both the reduction of the gender pay gap and the balanced participation of women in decision-making centers.

**1. The new National Action Plan for Gender Equality [NAPGE] 2021-2025** has been elaborated after reviewing the previous one and announced by the end of 2020. Its main priorities are in line with the priorities of the EU Gender Equality Strategy 2020-2025 and include actions on labour market inclusion, economic empowerment and work-life balance. Initiatives on dealing with gender pay gap situations are a vital part of the new Action Plan. More specifically, one of the priority axes of the NAPGE is equal participation of women in the labour market. To achieve this, the General Secretariat for Demography, Family Policy and Gender Equality implements measures such as:

- Equality Label of businesses,
- Transposition of the Worklife balance Directive (Law 4808/2021),
- Combating gender pay and pension gap (see projects below),
- Supporting of female entrepreneurship,
- Promoting education and training of women and girls in ICT.

### **2. Flagship programmes aiming to boost female labor participation**

The first one is The Project **“SHARE – Promoting work-life balance in companies and a better sharing of care between men and women”**, which is implemented by the Partnership of the General Secretariat for Demography, Family Policy and Gender Equality (as a Coordinator), the Center for Research on Equality (KETHI) and the Organization for the Professional Empowerment of women – Women On Top.

The Project aims to contribute in tackling traditional gender family roles and promoting reconciliation of work and private life, emphasizing in companies' working environments.

Project's main objectives include:

- engaging companies to apply gender sensitive interventions for the reconciliation of work and private life
- promoting knowledge sharing on good practices and initiatives on the field
- contributing in the development of methodology for the establishment of companies' Label on Gender Equality (process, criteria and evaluation)
- raising awareness on the importance of work-life balance with special focus on the role of men, and
- highlighting the benefits arising from family friendly working conditions and work-life balance initiatives both for employers and employees.

The second flagship program is the so called "**Nannies of the Neighborhood**".

A program designed to support working mothers to take care of their babies, aged from 2 months to about 2.5 years, by giving them access to accredited caregivers. The program will provide financial support to working mothers to cover a percentage of the childcare cost through a voucher. It is currently in the pilot implementation phase with the aim of being implemented horizontally through the co-financing mechanism of the new programming period 2021-2027.

The third flagship program which is expected to encourage female participation in the workforce is the creation of **Childcare units within large companies**:

This project has been submitted for funding to the Recovery and Resilience Facility [RRF] and offers financial support to companies in order to create childcare units. The implementation of the program will provide funding for the creation and equipment of a childcare unit inside the main buildings of large companies, as well as the subsidy of a childcarer. Funding can be given to up to 120 companies, including shopping malls throughout Greece, given that the malls have a concentration of many stores and a large number of employees in one place.

Lastly the **fourth flagship program is the "Diversity awareness" project**, under funding of the Recovery and Resilience Facility and its objectives are:

- developing a concrete mechanism that can monitor the progress and assess in annual basis the data related to equality and discriminations
- enhancing the role of the Equality Observatory -operating arm of the Ministry of Labour and Social Affairs - in a coordinated effort to produce comprehensive reports necessary for promoting equal opportunities
- creating a working group that will review best practices and standardised methodologies and put forward recommendations for the certification of organisations and awards related to diversity and inclusion practices
- raising employees' awareness of discriminated groups and avoiding discrimination in the way they approach and communicate with these groups;
- integrating a culture of openness and adaptability to diversity
- encouraging organizations to recruit and utilize executives belonging to discriminated groups, thus developing extroverted and innovative development systems that go beyond the stereotypical and closed systems of governance and entrepreneurship.

As for the training on Diversity which will be implemented in the public and the private sector, this project's key objective is to affect and motivate certain behaviors that promote diversity within organizations and, at the same time, further develop diversity awareness across different touch points of organizations. The training programs will be appropriately designed and differentiated depending on the target group, such as senior executives, mid-level executives, front office executives and back office executives. The goal is to train 1,600,000 employees by the end of 2024, with priority given to those employed in front office positions and managerial roles.

**3. The "PEGASUS: Addressing the Gender Pension in Greece" Project** has been implemented with the collaboration of the General Secretariat for Demography, Family Policy and Gender

Equality –GSDFPGE (coordinator), the Research Centre for Gender Equality (KETHI) and the National Center for Social Research (EKKE) and is funded by the European Union's "Rights, Equality and Citizenship" Program (2014-2020). Its main objective was to reinforce existing knowledge on all dimensions of the gender pension gap in Greece in order to contribute to the development of policies and other initiatives that will effectively address gender gaps in pensions. More specifically, the Project's specific objectives were:

- Studying and investigating the gender pension gap in Greece and identifying all factors associated with it.
- Identifying good practices on gender-related pension gap, as well as policies and institutional arrangements implemented by EU Member States to tackle gender pension gap.
- Assessing de facto and de jure implementation of EU guiding principles for gender equality in pensions in Greece.
- Developing a framework of policy proposals to address gender pension gap in Greece.
- Establishing a cooperation framework between stakeholders and committing stakeholders to develop proposals to reduce pension gap between men and women.
- Raising awareness on gender pension gap, as well as informing women on the impact of their choices on their pensions.

The "PEGASUS" Project has examined the issue of gender pension gap on a multifaceted basis through the analysis of all its dimensions and the assessment of its impact on the living conditions of retired women. Developing substantiated and targeted policy proposals to address the problem was a key issue. It sought a holistic approach, through the recording and analysis of the key factors leading to gender pension gap (such as gender inequalities, stereotypes, labor market segregation) and the development of awareness-raising and cooperation actions with policy makers, social partners and academics, highlighting and addressing the phenomenon for the first time in Greece.

The highlight of the project is the on-line pension calculator (hosted to the website of the Project: <http://sintaxi.isotita.gr/> ), an app designed to help employees calculate their future pension roughly based on their current employment data and/or their estimates of their future employment. The "On-line Pension Calculator" is addressed to men and women and only takes into account the general pension eligibility and pension calculation rules and does not concern specific provisions for specific categories of insured persons. The assessment is based on the Law 4387/2016, is indicative and under no circumstances binding on the competent bodies for the award of pensions: [http://sintaxi.isotita.gr/?page\\_id=245&lang=en](http://sintaxi.isotita.gr/?page_id=245&lang=en). The project's budget was 292.585,95€.

4. Alongside with these programs there are also the following **initiatives** which aim to support women in the labour front:

➤ The GSDFPGE, in collaboration with the Hellenic Public Employment Agency (DYPA), for the first time included unemployed women, victims of gender and domestic violence, as beneficiaries in the employment program of Vulnerable Social Groups.

The program subsidizes for 12-24 months, 90% of the total cost (wage and non-wage), up to 800€ per month for a fulltime job and 400 € for a part time job.

The women victims of domestic and gender-based violence who will complete employment support sessions in the Secretary's counseling centers will be able to participate in the program.

➤ **“Innovation Center for Women”**

This initiative includes:

- Designing innovative actions that will enhance the attraction of more girls to STEM studies and in companies based on research and innovation.
- Creation of a platform for the development of entrepreneurship that will be based on high technology, and giving special emphasis to female talent.
- Gender impact assessments in policy making, using a data-driven approach.
- Support of women's' entrepreneurship in the countryside and on the islands: It includes measures for the development and implementation of positive actions for women's cooperatives under the Law 4673/2020. Specifically, the Law requires the creation of exclusively female agricultural cooperatives and provides for development measures and implementation of positive actions, such as information, networking, promotion and exchange of know-how and good practices, in order to support women's participation and employment and strengthening their economic independence in agricultural production.
- Measures to enhance the skills of women and girls in matters of technology and entrepreneurship: Seminars for the empowerment of women entrepreneurs in collaboration with the National Chamber Network of Women Entrepreneurs aiming at strengthening women's entrepreneurship and skills development.
- Provision of auspices to institutions in order to start technology and entrepreneurship courses for women in our country.

5. Finally, **Greece's new labour law (Law 4808/2021)**, includes provisions that aim at the empowerment of women and gender equality in the workplace, such as the transposition of the EU Directive 2019/1158 on work-life balance for parents and carers. The overall objective of this law is to address the issue of the effective implementation of the principle of equality between men and women, in terms of labour market opportunities and equal treatment at work, by improving access to work-life balance arrangements, such as paid leave and flexible working arrangements for all, but also by creating incentives, such as the introduction of pay for the unpaid entitlements granted so far and to increase their use by men. Furthermore, by providing equal protection against dismissal for family reasons, the issue of removing any disincentives or traditional stereotypes associated with female employment is addressed.

Through the new labour law:

- Fathers will have a right to paternity leave (14 days with pay) and will be protected against dismissal for 6 months from the birth of the child.
- Both parents will have a right to a 4-month parental leave
- Parents with children up to 12 years old will have a right to flexible arrangements (eg telework, flexible hours, part-time)
- Caregivers will have a right to a five-day leave, for a relative or a roommate in need of care
- Each worker has the right to time off from work (2 days per year) for urgent family reasons.

- The post-natal portion of the 9-week maternity leave, as well as all kinds of the remuneration and allowances connected with it, are extended to working women who adopt a child, from the integration of the child into the family and up to the age of eight (8) years.
- A 7-days paid leave for undergoing medically assisted reproduction methods is established.

**6. Law 4604/2019** is the first attempt in Greece of drafting a horizontal bill aiming at the creation of all those circumstances that could lead to the achievement of substantive gender equality and the elimination of gender inequalities in all sectors of public, social and economic life. The notions of gender mainstreaming and gender budgeting are introduced for the first time into a legislative text. The system of quota 40% in favour of women is institutionalized for the lists of candidates in each electoral prefecture at the parliamentary elections and also for the election of the members of the European Parliament. This is a clear measure for women's empowerment in political decision-making. Also, Article 9 of the Law refers to the establishment of the "**National Council for Gender Equality**", "**a collective advisory counseling body**" whose main competency will be to evaluate and assess the existing gender equality policies and propose new initiatives to the GSFPE in collaboration with NGOs and women's organizations and other relevant stakeholders of all government levels. A chapter is also dedicated to "gender mainstreaming in private life and labor" with articles concerning provisions on behalf of the employer for the substantive gender equality in labor, social dialogue, establishment of Equality Signs and Gender Awards for enterprises adopting gender equality corporate policies<sup>22</sup>.

#### **Representation of Women in positions of responsibility in private companies in Greece**

The promotion of women in decision making processes and in public life in general has always been among the strategic priorities of Greece's National Action Plans for Gender Equality. NAPGE 2021-2025 includes a comprehensive set of actions regarding the increase of the number of women in positions of responsibility (legislative interventions, awareness-raise campaigns, monitoring women's representation in management positions, enhancing women's networking) under the Priority Axis 3 ("Equal participation of women in decision-making").

Moreover in the legislative field, Greece has introduced Law 4706/2020<sup>23</sup>, dealing with corporate governance aiming at modernizing the internal structure of the listed companies with a view of strengthening their autonomy in order to meet modern Capital Markets' requirements. Article 3 par. 1 provides for the first time in Greece a gender quota of at least 25% on listed company boards. Therefore, the new Law envisages provisions regarding a more comprehensive gender representation in the Board of Directors, by introducing mandatory quotas and stipulates the company's obligation to set diverse criteria for the selection of its directors. Companies had a 12 months period to comply with the quota. Today, according to data from the Hellenic Capital Market Commission, they all meet this obligation.

---

<sup>22</sup> You may find the full text of the Law, in Greek and English, on the official GSFPE website <http://www.isotita.gr/nomothesia/ethniki-nomothesia/>.

<sup>23</sup> Official Government Gazette A' 136/17.07.2020.

*Annex to CC30/2005*

# INFORMATION BY PPC (DEI) S.A.

TABLE 1

ΑΡΙΘΜΟΣ ΔΥΣΤΥΧΗΜΑΤΩΝ / ΔΕΙΚΤΕΣ ΣΥΧΝΟΤΗΤΑΣ & ΣΟΒΑΡΟΤΗΤΑΣ ΑΤΥΧΗΜΑΤΩΝ ΠΡΟΣΩΠΙΚΟΥ ΛΚΔΜ  
Εξέλιξη χρονικής περιόδου: 2003 - 2021

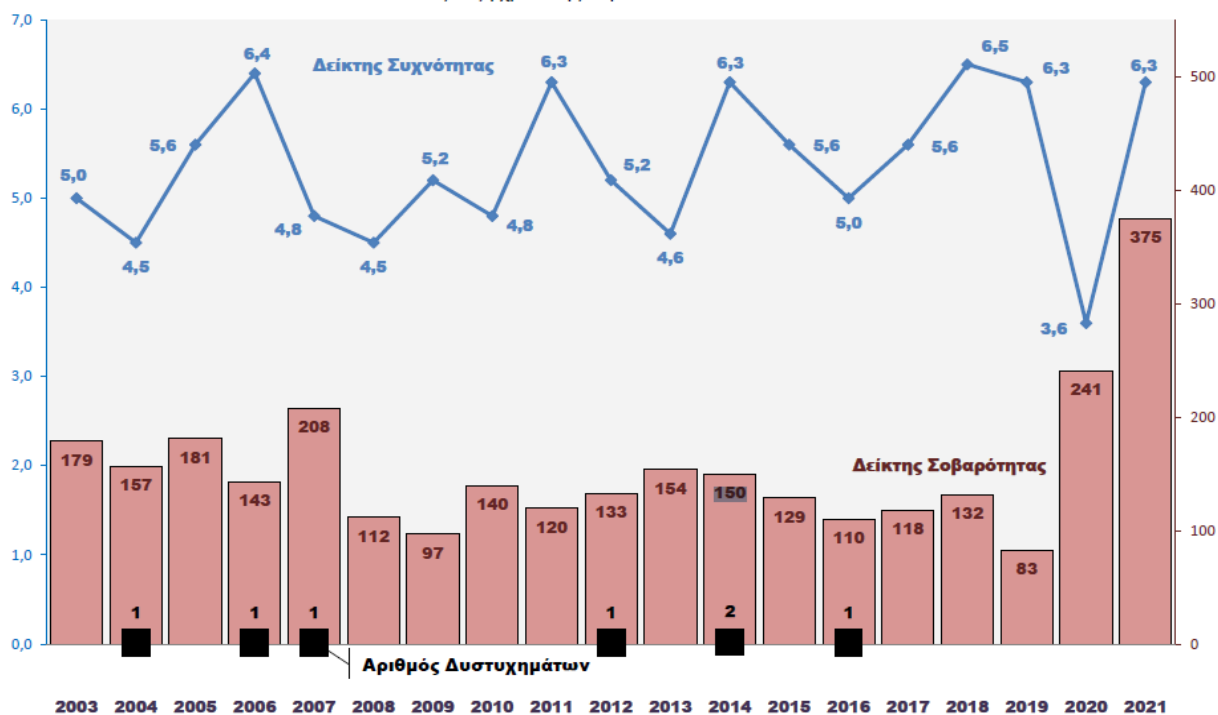




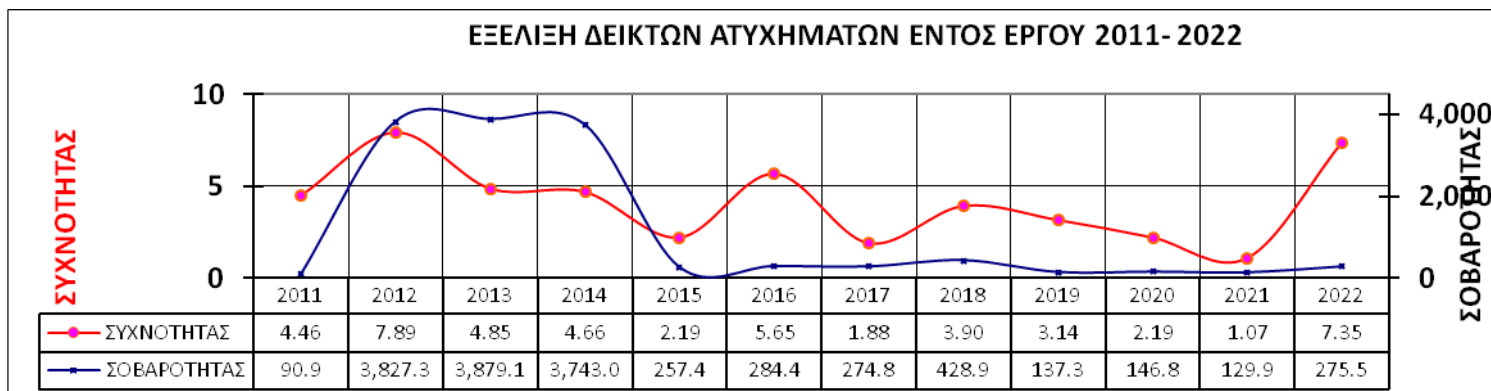
TABLE 2

Western Macedonia Lignite Center  
DATA on ACCIDENTS 2011 - 2022

YEAR	HOURS OF WORK	NUMBER OF ACCIDENTS		FREQUENCY		DAYS OF INCOMPETENCY		SEVERITY	
2011	1.793.523	8	9	4,46	5,02	163	168	90,9	93,67
2012	1.646.850	13	14	7,89	8,50	6303	6.330	3.827,3	3.843,70
2013	1.650.111	8	8	4,85	4,85	6401	6.401	3.879,1	3.879,13
2014	1.716.005	8	8	4,66	4,66	6423	6.423	3.743,0	3.743,00
2015	1.825.681	4	6	2,19	3,29	470	493	257,4	270,04
2016	1.768.643	10	11	5,65	6,22	503	592	284,4	334,72
2017	1.593.621	3	3	1,88	1,88	438	438	274,8	274,85
2018	1.538.838	6	7	3,90	4,55	660	688	428,9	447,09
2019	1.274.225	4	5	3,14	3,92	175	195	137,3	153,03
2020	913.052	2	3	2,19	3,29	134	144	146,8	157,71
2021	931.376	1	1	1,07	1,07	121	121	129,9	129,92
2022	544.544	4	4	7,35	7,35	150	150	275,5	275,46

\*The numbers in red include road accidents out of work (on the way)

Accident Frequency Index for the Personnel of the Western Macedonia Lignite Center



\*ΣΥΧΝΟΤΗΤΑ =  
 Frequency  
 ΣΟΒΑΡΟΤΗΤΑ=  
 Severity


**TABLE 3****DATA ON SERVICES PROVIDED TO THE PERSONNEL OF MINES IN WESTERN  
MACEDONIA (ΔΛΚΔΜ) AND MEGALOPOLIS (ΔΛΠΜ)**

	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Psychiatric Evaluations</b>		<b>1</b> ΔΛΚΔΜ:1	<b>1</b> ΔΛΚΜ:1	
<b>Social Surveys</b>	<b>27</b> ΛΚΔΜ:24 ΔΛΚΜ:3	<b>16</b> ΛΚΔΜ:15 ΔΛΚΜ:1	<b>9</b> ΛΚΔΜ:8 ΔΛΚΜ:1	<b>21</b> ΛΚΔΜ:21
<b>Counseling</b>	<b>29</b> ΛΚΔΜ:14 ΔΛΚΜ:15	<b>29</b> ΛΚΔΜ:9 ΔΛΚΜ:20	<b>19</b> ΛΚΔΜ:4 ΔΛΚΜ:15	<b>12</b> ΛΚΔΜ:12
<b>Visits</b>	<b>51</b> ΛΚΔΜ:51	<b>21</b> ΛΚΔΜ:21	<b>3</b> ΛΚΔΜ:3	<b>4</b> ΛΚΔΜ:4
<b>Psychological Support Sessions</b>	<b>112</b> ΛΚΔΜ:112	<b>41</b> ΛΚΔΜ:41	<b>3</b> ΛΚΔΜ:3	<b>2</b> ΛΚΔΜ:2

**TABLE 4****Typical Rotating Shifts Schedule for a four-week period****Π: Morning, A: Afternoon, N: Night, R: Rest****ΟΜΑΔΑ= Team**

ΟΜΑΔΑ	ΔΡ	ΤΡ	ΤΤ	ΠΜ	ΠΡ	ΣΒ	ΚΡ
<b>A</b>	R	R	Π	Π	A	A	A
<b>B</b>	Π	Π	A	A	N	N	N
<b>Γ</b>	A	A	N	N	R	R	R
<b>Δ</b>	N	N	R	R	Π	Π	Π
ΟΜΑΔΑ	ΔΡ	ΤΡ	ΤΤ	ΠΜ	ΠΡ	ΣΒ	ΚΡ
<b>A</b>	N	N	R	R	Π	Π	Π
<b>B</b>	R	R	Π	Π	A	A	A
<b>Γ</b>	Π	Π	A	A	N	N	N
<b>Δ</b>	A	A	N	N	R	R	R
ΟΜΑΔΑ	ΔΡ	ΤΡ	ΤΤ	ΠΜ	ΠΡ	ΣΒ	ΚΡ
<b>A</b>	A	A	N	N	R	R	R
<b>B</b>	N	N	R	R	Π	Π	Π
<b>Γ</b>	R	R	Π	Π	A	A	A
<b>Δ</b>	Π	Π	A	A	N	N	N
ΟΜΑΔΑ	ΔΡ	ΤΡ	ΤΤ	ΠΜ	ΠΡ	ΣΒ	ΚΡ
<b>A</b>	Π	Π	A	A	N	N	N
<b>B</b>	A	A	N	N	R	R	R
<b>Γ</b>	N	N	R	R	Π	Π	Π
<b>Δ</b>	R	R	Π	Π	A	A	A



 ΔΙΕΥΘΥΝΣΗ ΔΙΔΑΚΤΙΚΗΣ ΠΑΡΑΓΩΓΗΣ ΜΕΓΑΛΟΠΟΛΗΣ ΓΡΑΦΕΙΟ ΑΠΑΣΧΟΛΗΣΗΣ		ΠΡΟΓΡΑΜΜΑ ΕΡΓΑΣΙΑΣ ΕΤΟΥΣ 2022 ΕΚΜΕΤΑΛΛΕΥΣΗ ΜΑΡΑΘΩΝΙΑΣ																													
ΒΑΡΔΙΑ No 1																															
ΜΗΝΕΣ	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
ΙΑΝΟΥΑΡΙΟΣ	Av	Av	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av
ΦΕΒΡΟΥΑΡΙΟΣ	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av
ΜΑΡΤΙΟΣ	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av
ΑΠΡΙΛΙΟΣ	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av
ΜΑΙΟΣ	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΙΟΥΝΙΟΣ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΙΟΥΛΙΟΣ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΑΥΓΟΥΣΤΟΣ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΣΕΠΤΕΜΒΡΙΟΣ	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΟΚΤΩΒΡΙΟΣ	A	A	A	A	A	Av	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΝΟΕΜΒΡΙΟΣ	A	A	Av	Av	Av	Av	B	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΔΕΚΕΜΒΡΙΟΣ	A	Av	Av	Av	Av	B	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΙΑΝΟΥΑΡΙΟΣ 2023	Av	Av	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	Av	Av	Av	Av	Av	
ΒΑΡΔΙΑ No 2																															
ΜΗΝΕΣ	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
ΙΑΝΟΥΑΡΙΟΣ	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΦΕΒΡΟΥΑΡΙΟΣ	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΜΑΡΤΙΟΣ	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΑΠΡΙΛΙΟΣ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΜΑΙΟΣ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΙΟΥΝΙΟΣ	Av	Av	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΙΟΥΛΙΟΣ	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΑΥΓΟΥΣΤΟΣ	A	A	A	Av	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΣΕΠΤΕΜΒΡΙΟΣ	A	Av	Av	Av	Av	B	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΟΚΤΩΒΡΙΟΣ	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	
ΝΟΕΜΒΡΙΟΣ	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	
ΔΕΚΕΜΒΡΙΟΣ	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΙΑΝΟΥΑΡΙΟΣ 2023	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΒΑΡΔΙΑ No 3																															
ΜΗΝΕΣ	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
ΙΑΝΟΥΑΡΙΟΣ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΦΕΒΡΟΥΑΡΙΟΣ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΜΑΡΤΙΟΣ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΑΠΡΙΛΙΟΣ	A	A	A	A	A	A	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΜΑΙΟΣ	A	A	A	A	Av	Av	Av	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΙΟΥΝΙΟΣ	A	A	Av	Av	Av	Av	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΙΟΥΛΙΟΣ	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	
ΑΥΓΟΥΣΤΟΣ	Av	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	
ΣΕΠΤΕΜΒΡΙΟΣ	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΟΚΤΩΒΡΙΟΣ	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΝΟΕΜΒΡΙΟΣ	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΔΕΚΕΜΒΡΙΟΣ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΙΑΝΟΥΑΡΙΟΣ 2023	Γ	Γ	Γ	Av	Av	A	A	A	A	A	Av	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΒΑΡΔΙΑ No 4																															
ΜΗΝΕΣ	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
ΙΑΝΟΥΑΡΙΟΣ	A	A	A	A	A	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΦΕΒΡΟΥΑΡΙΟΣ	A	A	A	Av	Av	Av	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΜΑΡΤΙΟΣ	A	A	A	Av	Av	Av	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΑΠΡΙΛΙΟΣ	Av	Av	Av	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΜΑΙΟΣ	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΙΟΥΝΙΟΣ	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΙΟΥΛΙΟΣ	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΑΥΓΟΥΣΤΟΣ	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΣΕΠΤΕΜΒΡΙΟΣ	Γ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΟΚΤΩΒΡΙΟΣ	Γ	Γ	Γ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	Av	
ΝΟΕΜΒΡΙΟΣ	Γ	Av	Av	A	A	A	A	A	A	Av	Av	Av	Av	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΔΕΚΕΜΒΡΙΟΣ	Av	A	A	A	A	A	A	Av	Av	Av	Av	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	
ΙΑΝΟΥΑΡΙΟΣ 2023	A	A	A	A	Av	Av	Av	B	B	B	B	B	B	B	Av	Av	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	Γ	