

4 September 2024

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the fourth payment request of non-repayable support submitted by Greece on 6 June 2024, transmitted to the Economic and Financial Committee by the European Commission

Executive summary

In accordance with Article 24(2) of Regulation (EU) 2021/241, on 6 June 2024, Greece submitted a request for payment for the fourth instalment of the non-repayable support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Greece provided due justification of the satisfactory fulfilment of the 20 milestones and targets of the fourth instalment of the non-repayable support, as set out in Section 3.1(1.4) of the Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece¹.

In its payment request, Greece has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary. Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Greece, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 20 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Greece's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, reforms to boost renewable energy capacity, establish a vocational education quality control system, accelerate investments in the healthcare sector, codify and simplify tax legislation, increase the efficiency of the justice system, and provide skills to judicial staff. The milestones and targets also confirm progress towards the completion of investment projects related to the green transition, including in the electricity interconnection of islands, the installation of storage systems to enhance renewable energy use, energy-efficiency renovations in public buildings, improvement of water infrastructures, and reforestation, forest restoration and wildfire prevention. Further investments concern the deployment of small satellites, the construction and renovation of judicial buildings, road and sports infrastructure, road safety upgrades, and rectification works in regional airports.

By the transmission of this positive preliminary assessment and in accordance with Article 24(4) of Regulation (EU) 2021/241, the Commission asks for the opinion of the Economic and Financial Committee on the satisfactory fulfilment of the relevant milestones and targets.

¹ ST 10152 2021 INIT and ST 10152 2021 ADD 1, as amended by 15831/1/23 REV 1 and 15831/23, ADD 1 REV 1, not yet published.

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Non-repayable support

Number and name of the Milestone: M1 Interconnection of islands - contract awards

Related Measure: [16870] Interventions for the electricity interconnection of islands and the upgrading of the electricity network

Qualitative Indicator: Notification of award of all contracts

Time: Q2 2023

1. Context:

The investment concerns the electricity interconnection of the Cyclades Islands (Phase D), an overhead line connecting Extra High Voltage Centre (EHVC) Corinth and EHVC Koumoundouros and other accompanying projects, such as the renovation of the EHVC Koumoundouros station. The main objective of this investment is to boost the energy system security, while increasing the potential for electricity generation from renewables in the islands and the Peloponnese. The projects should reduce energy costs, leading to new investments and jobs in the energy-intensive sectors of the economy.

Milestone 1 consists of the notification of the award by the Independent Power Transmission Operator (IPTO) of all contracts for the complete installation of a set of projects: 1) Naxos - Thira cable connection; 2) Extra High Voltage Cable (EHVC) Koumoundouros-Korinthos (parts 1 and 2); and 3) Substations Milos, Folegandros, Serifos and cable connections Lavrio-Serifos, Serifos-Milos, Milos-Folegandros, Folegandros-Thira.

Milestone 1 is the first step of the implementation of the investment, and it will be followed by milestone 2, which is related to cable installations and tests for Naxos-Thira and 50% of completion of EHVC Koumoundouros-Korinthos, and milestone 3 that relates to the completion and start of operation of all the three sub-projects (Naxos-Thira connection, EHVC Koumoundouros-Korinthos, Substations and other connections), as well as the successful incorporation in the Hellenic Electricity Transport System. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Copy of contract award decision regarding the "Study of Supply and Installation of Underground and Submarine XLPE Cables 150kV for the 150kV T.L. Naxos - Thira" from the Independent Power Transmission Operator (IPTO) S.A. to FULGOR Elliniki Companika ILODODON AE, dated 13 September 2021	Contract award decision for project 1) Naxos - Thira cable connection
3	Copy of contract award regarding "Study, Supply of Equipment and Installation ('turnkey project') of the new GIS Substation 150kV/MT of Thira and of Static VAR Compensator (SVC) with a capacity of -100 / +50 MVAR at Thira Substation" from the Independent Power Transmission Operator (IPTO) S.A. to Consortium "DAMCO ENERGY S.A. – Xian ELECTRIC ENGINEERING Co/Ltd", dated 1 October 2021	Contract award decision for project 1) Naxos - Thira cable connection (substation)

4	Copy of contract award regarding “Study of Supply and Installation of Underground and Submarine XLPE Cables 150kV for the 150kV T.L.: SECTION A: Lavrio – Serifos and Serifos - Milos” and “Study of Supply and Installation of Underground and Submarine XLPE Cables 150kV for the 150kV T.L.: SECTION B: Milos – Folegandros and Folegandros – Thira” from the Independent Power Transmission Operator (IPTO) S.A. to ‘FULGOR MONOTI ANONYMOS EPICHEIRISI EPICHEIRISI EPICHEIRISI KAI KAI PLOGIAS’ and PRYSMIAN Powerlink S.R.L, dated 18 November 2022	Contract award decision for project 3) cable connections Lavrio-Serifos, Serifos-Milos, Milos-Folegandros, Folegandros-Thira.
5	Copy of contract award regarding “Study, Supply of Equipment and Installation (‘turnkey project’) of the new Substations: SECTION A: GIS Substation 150kV/MT of Folegandros and Milos” and “Study, Supply of Equipment and Installation (‘turnkey project’) of the new Substations” and SECTION B: GIS Substation 150kV/MT of Serifos” from the Independent Power Transmission Operator (IPTO) S.A. to TERNA S.A. and Consortium “NARI Technology Co., Ltd – ELECTROMECH S.A.”, dated 9 February 2023	Contract award decision for project 3) Substations Milos, Folegandros, Serifos
6	Copy of contract award regarding “Study, Supply of Materials and Construction (turnkey project) of the GIS Substation 400kV/150kV/30kV of Koumoundourou, Attica” from the Independent Power Transmission Operator (IPTO) S.A. to Mytilineos S.A., dated 4 February 2021	Contract award decision for project 2) Extra High Voltage Cable (EHVC) Koumoundouros – Korinthos (parts 1)
7	Copy of contract award regarding “Supply of Equipment and Construction of Overhead T.L. 400KV EHVC Koumoundourou – EHVC Corinth and Associated Works in T.L. 150KV & 400KV Involved in the Overall Implementation of the Project” from the Independent Power Transmission Operator (IPTO) S.A. to joint venture “Mytilineos S.A. – ATERMEA ATTEE”, dated 11 August 2023	Contract award decision for project 2) Extra High Voltage Cable (EHVC) Koumoundouros – Korinthos (parts 2)

3. Analysis:

The justification and substantiating evidence provided by the Greek cover all constitutive elements of the milestone.

Notification of the award of all contracts by Independent Power Transmission Operator (IPTO) for the complete installation of:

1) Naxos - Thira cable connection;

The notification of award of contracts by IPTO for the complete installation of the Naxos-Thira cable connection is demonstrated by evidence 2 above (page 1 of copy of contract award decision regarding the “Study of Supply and Installation of Underground and Submarine XLPE Cables 150kV for the 150kV T.L. Naxos - Thira” of 11 August 2023) and evidence 3 above (page 1 of copy of contract award decision regarding the “Study, Supply of Equipment and Installation (‘turnkey project’) of the new GIS Substation 150kV/MT of Thira and of Static VAR Compensator (SVC) with a capacity of -100 / + 50 MVAR at Thira Substation” of 30 September 2021). These two award decisions together constitute all the contracts for the complete installation of Naxos-Thira cable connection.

2) Extra High Voltage Cable (EHVC) Koumoundouros - Korinthos (parts 1 and 2);

Concerning part 1 of the project, which relates to the installation of the GIS technology to the high-voltage station Koumoundouros, the notification of award of contracts by IPTO for the complete installation of the Extra High Voltage Cable (EHVC) Koumoundouros-Korinthos is demonstrated by evidence 6 (page 2 of copy of contract award regarding “Study, Supply of Materials and Construction (turnkey project) of the GIS Substation 400kV/150kV/30kV of Koumoundourou, Attica” of 2 February 2021).

Concerning part 2 of the project, which relates to the construction of the EHVC, the notification of award of contracts by IPTO for the installation of the Extra High Voltage Cable (EHVC) Koumoundouros – Korinthos is demonstrated by evidence 7 (page 1 of copy of contract award regarding “Supply of Equipment and Construction of Overhead T.L. 400KV EHVC Koumoundourou – EHVC Corinth and Associated Works in T.L. 150KV & 400KV Involved in the Overall Implementation of the Project” of 11 August 2023).

These two award decisions together constitute all the contracts for the complete installation of the parts 1 and 2 of the Extra High Voltage Cable (EHVC) Koumoundouros-Korinthos.

and 3) Substations Milos, Folegandros, Serifos and cable connections Lavrio-Serifos, Serifos-Milos, Milos-Folegandros, Folegandros-Thira.

Concerning substations Milos, Folegandros and Serifos, the notification of award of contracts by IPTO for the complete installation of the substations Milos, Folegandros and Serifos is demonstrated by evidence 5 (page 1 and 3 of copy of contract award regarding “Study, Supply of Equipment and Installation (‘turnkey project’) of the new Substations: SECTION A: GIS Substation 150kV/MT of Folegandros and Milos” and “Study, Supply of Equipment and Installation (‘turnkey project’) of the new Substations and SECTION B: GIS Substation 150kV/MT of Serifos” of 8 February 2023).

Concerning cable connections Lavrio-Serifos, Serifos-Milos, Milos-Folegandros and Folegandros-Thira, the notification of award of contracts by IPTO for the installation of cable connections Lavrio-Serifos, Serifos-Milos, Milos-Folegandros and Folegandros-Thira is demonstrated by evidence 4 (pages 1 and 3 of copy of contract award regarding “Study, Supply of Supply and Installation of Underground and Submarine XLPE Cables 150kV for the 150kV T.L.: SECTION A: Lavrio – Serifos and Serifos - Milos” and “Study of Supply and Installation of Underground and Submarine XLPE Cables 150kV for the 150kV T.L.: SECTION B: Milos – Folegandros and Folegandros – Thira” of 18 November 2022).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: T6 RES account - capacity increase, target 1

Related Measure: [16865] Restructuring and enhancement of the RES CHP Account revenues

Quantitative Indicator: New capacity (GW) of renewable energy sources put in operation

Baseline: 0

Target: 1

Time: Q2 2023

1. Context:

The reform concerned by this milestone consists of an increase of 3 Gigawatt in the electricity production capacity from renewable energy sources (RES).

Target 6 requires 1 Gigawatt of new RES capacity installed and operational.

Target 6 is the second target of the reform, and it follows the completion of milestone 4, related to RES account legislation to amend L. 4001/2011; entry into force of all relevant decisions, including codes, by Ministries, by the National Regulatory Authority (RAE) and by the Administrator of Renewable Energy Sources and Guarantees of Origin (DAPEEP). It will be followed by target 7, related to 1 Gigawatt of additional RES capacity installed and operational, and target 8, related to 1 Gigawatt of additional RES capacity installed and operational. The reform has a final expected date for implementation on 30 June 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the target requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Certifying document by the Managing Body for RES (DAPEEP) duly justifying how the target was satisfactorily fulfilled, dated 30 May 2024	Certification from DAPEEP to the Greek Ministry of Environment and Energy on 30 May 2023, reporting that the installed power of RES projects (small hydro, photovoltaic, onshore wind parks) that have been activated (electrified / put into operation) from 01/01/2021 to the first half of 2023, and which had signed an Operational Support contract with DAPEEP SA after 01/02/2020, amounts to 2.555,48 MW .

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target.

New RES capacity of 1 GW installed and operational

According to a certification from the Managing Body for RES (DAPEEP) to the Greek Ministry of Energy and Environment (evidence 2), the capacity of RES projects that was put into operation between 1 January 2021 and 30 June 2023, and which had signed an Operational Support contract with DAPEEP SA after 1 February 2020, amounts to 2.555,48 MW. This is higher than the target of 1 GW of new RES capacity installed and operational.

DAPEEP, the Operator for RES and Guarantees of Origin, is by Law and the relevant regulatory framework, the competent national body, which is responsible for the Register for RES plants in the mainland. As an independent body supervised by the Energy Regulator, DAPEEP is tasked to provide information on the installed capacity and energy produced by RES technology. Accordingly, DAPEEP's certification bears sufficient guarantees of independence from the beneficiary of measure 16865, in order to consider its attestation as primary evidence.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: T7 RES account - capacity increase, target 2

Related Measure: [16865] Restructuring and enhancement of the RES CHP Account revenues

Quantitative Indicator: New capacity (GW) of renewable energy sources put in operation

Baseline: 1

Target: 2

Time: Q2 2024

1. Context:

The reform concerned by this milestone consists of an increase of 3 Gigawatt in the electricity production capacity from renewable energy sources (RES).

Target 7 requires an aggregate of 2 Gigawatt of new RES capacity installed and operational.

Target 7 is the third target of the reform, and it follows the completion of target 6, related to 1 Gigawatt of additional RES capacity installed and operational. It will be followed by target 8, related to 1 Gigawatt of additional RES capacity installed and operational. The reform has a final expected date for implementation on 30 June 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the target requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Certifying document by the Managing Body for RES (DAPEEP) duly justifying how the target was satisfactorily fulfilled, dated 30 May 2024	Certification sent from DAPEEP to the Greek Ministry of Environment and Energy on 30 May 2023, reporting that the installed power of RES projects (small hydro, photovoltaic, onshore wind parks) that have been activated (electrified / put into operation) from 01/01/2021 to the first half of 2023, and which had signed an Operational Support contract with DAPEEP SA after 01/02/2020, amounts to 2.555,48 MW .

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

New RES capacity of 1 GW installed and operational

According to certification from the Managing Body for RES (DAPEEP) to the Greek Ministry of Energy and Environment, the capacity of RES projects that was put into operation between 1 January 2021 and 30 June 2023, and which had signed an Operational Support contract with DAPEEP SA after 1

February 2020, amounts to 2.555,48 MW. This is higher than the target of 2 Gigawatt of new RES capacity installed and operational.

DAPEEP, the Operator for RES and Guarantees of Origin, is by Law and the relevant regulatory framework, the competent national body, which is responsible for the Register for RES plants in the mainland. As an independent body supervised by the Energy Regulator, DAPEEP is tasked to provide information on the installed capacity and energy produced by RES technology. Accordingly, DAPEEP's certification bears sufficient guarantees of independence from the beneficiary of measure 16865, in order to consider its attestation as primary evidence.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: M11 Storage - contracts

Related Measure: [16926] Support of the installation of storage systems to enhance RES penetration

Qualitative Indicator: Notification of award of all contracts

Time: Q2 2023

1. Context:

The investment provides public grants for the installation of up to 1 380 MW capacity of energy storage in the electricity system. These investments allow the system integration of new RES capacity, which is required for the achievement of NECP targets. In addition, this action also alleviates network congestion, increases the flexibility of the electricity system and liquidity of balancing market, enhances system adequacy, enables energy efficiency, promotes transparency in electricity price formation, and lowers energy costs.

Milestone 11 consists of the notification of award of all contracts for selected projects (i.e. besides the long-duration Amfilochia Pumped Hydro Storage that is selected through an individual process), for a total of up to 700 MW of capacity (and minimum capacity of 500 MW).

Milestone 11 is the first step of the implementation of the investment, and it will be followed by milestone 16, related to the entry into operation of all energy storage projects for up to 1 380 MW. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled.	
2	Copy of notification of award of contracts, Decision of the Regulatory Authority for Waste, Energy and Water (RAWEW) Nr. E-130/10.08.2023	Contract award decision from RAWEW to a set 12 companies, for 12 selected front-of-the-meter battery storage system projects, dated 10 August 2023
3	Copy of notification of award of contracts, Decision of RAWEW Nr. E-40/15.02.2024	Contract award decision from RAWEW to a set of 11 companies for 11 selected front-of-the-meter battery storage system projects, dated 15 February 2024

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Notification of award of all contracts for selected projects (i.e. besides the long-duration Amfilochia Pumped Hydro Storage that is selected through an individual process), for a total of up to 700MW of capacity (and minimum capacity of 500MW)

The Decision of the competent Regulatory Authority for Waste, Energy and Water (RAWEW) number E-130/10.08.2023 of 10 August 2023 (evidence 2) indicates at page 19 that the notification of award for the projects (granting investment and operating aid to electricity storage plants) selected under the first call for tender corresponds to a total capacity for the selected storage plants of 411.79 MW. The Decision of RAWEW under E-40/15.02.2024 (evidence 3) indicates at page 10 that the notification of award for the same type of projects selected under the second call for tender corresponds to a total capacity for the selected storage plants of 299.775 MW. The two Decisions from RAWEW therefore prove that the projects for all the contracts awarded represent a total capacity of 711.565 MW, which is above the targeted minimum capacity of 500 MW.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: M34 Energy efficiency public buildings - applications approved

Related Measure: [16876] Energy upgrade of public sector buildings

Qualitative Indicator: Notification of awards for approved applications by the Ministry of Environment and Energy of selected interventions at public sector buildings.

Time: Q2 2023

1. Context:

This investment comprises the renovation of public sector buildings with a view to increasing their energy efficiency, through the involvement of energy savings companies (ESCOs). The investment also contains the energy upgrade of street lighting infrastructures. This investment aims to contribute to meeting the energy efficiency targets adopted in the NECP and reducing CO₂ emissions. This investment needs to comply with specific do not significant harm requirements such as the re-use, recycling and other material recovery of the non-hazardous construction and demolition waste, in line with EU legislation and the EU Construction and Demolition Waste Management Protocol.

Milestone 34 requires the approval by the Ministry of Environment and Energy of applications for 150 public sector buildings ensuring that the CO₂ emissions of these respective buildings is reduced by, on average, at least 30% compared to their existing situation (as indicated through the energy audits performed prior to the interventions). For the Energy upgrade of public sector buildings programme, the legal framework to enable Energy Performance Contracts has been established in order to allow the involvement of energy saving companies into the programme of energy efficiency.

Milestone 34 is the first step of the implementation of the investment, and it will be followed by Target 35 related to interventions to improve energy efficiency completed for public sector buildings (150 buildings) and completion of the upgrading of 100 000 street lighting points. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Decision no. ΥΠΕΝ/ΔΕΠΕΑ/61171/1128 of the Minister of Environment and Energy on the approval of acceptance of beneficiary entities in the subproject 'Energy Upgrading of public sector buildings' of the Action 'Energy upgrading of the public sector and infrastructure of public bodies' with ID 16876, included in the RRF under the code TA5165225, issued on 5 June 2024. The decision includes a table of selected building data in annex.	Decision of approval by the Ministry of Environment and Energy confirming the public sector buildings selected on the basis of the recommendation made by the Centre for Renewable Energy Sources and Saving (CRES).
3	Protocol no 531 of 5 June 2024 by the Center of Renewable Energy and Energy Savings (CRES) on the decision	Recommendation made by the implementing body (CRES) on the public sector buildings

	concerning the acceptance of beneficiaries in the 'Ilektra programme (i.e. public sector buildings programme).	selected as beneficiaries in the sub-project 'Energy upgrade of public sector buildings' of the Action 'Energy upgrading of the public sector and infrastructure of public bodies' on the basis of the selection criteria set out in the Joint Ministerial Decisions listed below, providing the rules for the implementation of the sub-project('programme guide').
4	Joint Ministerial Decision ΥΠΕΕΝ/ΔΕΠΕΑ/90689/707 of the Ministers of Finance, Development, Infrastructure and Transport, Environment and Energy on the funding programme for the energy upgrade of public buildings, Official Journal B 4813/12.09.2022, entered into force 12 September 2022.	Joint Ministerial Decision (JMD) adopted, providing the rules for the implementation of the sub-project 'Energy upgrade of public sector buildings' of the Action 'Energy upgrading of the public sector and infrastructure of public bodies' ('programme guide' in Annex of the JMD).
5	Joint Ministerial Decision ΥΠΕΕΝ/ΔΕΠΕΑ/59055/1063 of the Ministers of Finance, Development, Infrastructure and Transport, Environment and Energy on the funding programme for the energy upgrade of public buildings, Official Journal B 3167/04.06.2024, entered into force 4 June 2024.	Joint Ministerial Decision (JMD) adopted, providing the rules for the implementation of the sub-project 'Energy upgrade of public sector buildings' of the Action 'Energy upgrading of the public sector and infrastructure of public bodies' ('programme guide' in Annex of the JMD).
6	Law 4843/2021 on Transposition of Directive (EU) 2018/2002 of the European Parliament and of the Council of 11 December 2018 amending Directive 2012/27/EU on energy efficiency, adaptation to Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action and Delegated Commission Regulation (EU) 2019/826 of 4 March 2019 amending the Annexes VIII and IX to Directive 2012/27/EU of the European Parliament and of the Council on the content of comprehensive assessments of efficient heating and cooling potential and related energy performance arrangements in the building sector as well as strengthening renewable energy sources and competition in the electricity market, and other urgent provisions, Official Journal A 193/20.10.2021, entered into force 20 October 2021.	Law setting out requirements for the Energy Performance Contracts and Energy Performance Certificates.

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the description of the milestone.

Notification of awards for approved applications by the Ministry of Environment and Energy of selected interventions at public sector buildings

The Council Implementing Decision states that the qualitative indicator for the fulfilment of the milestone is the notification of awards for approved applications by the Ministry of Environment and Energy of selected interventions at public sector buildings. The Council Implementing Decision also states, in the measure description, the “Approval by the Ministry of Environment and Energy of applications for 150 public sector buildings”. We interpret this requirement based on the latter wording of the measure description and not based on the qualitative indicator. To be noted that Greece previously revised a similar milestone (M33) to change the corresponding qualitative indicator to “Approval by the Ministry of Environment and Energy of applications submitted for selected interventions at private sector entities”. In line with Milestone 33, the qualitative indicator of Milestone 34 shall be read and assessed as “Approval by the Ministry of Environment and Energy for selected interventions at public sector buildings”.

The Center for Renewable Energy Sources and Saving (‘CRES’) is the national competent body to check the eligibility of the public sector buildings that applied to become beneficiaries of the sub-project ‘Energy upgrading of the public sector and infrastructure of public bodies’, referred to as ‘Ilektra Programme’. According to the decision of the CRES on the acceptance of beneficiaries in the ‘Ilektra’ programme (evidence 3), applications corresponding to 172 public sector buildings have been found compliant with the Ilektra programme requirements (evidence 3, page 5). The Ministry of Environment and Energy issued a decision ratifying the CRES decision (evidence 2).

On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Ensuring that the CO₂ emissions of these respective buildings is reduced by, on average, at least 30% compared to their existing situation (as indicated through the energy audits performed prior to the interventions).

As per the annex in the decision referred above in evidence 2, confirmation that an energy performance audit setting out CO₂ emissions will be carried out before the intervention is provided for the selected 172 public sector buildings.

The applicants’ obligation to comply with the 30% reduction in the CO₂ emissions per building is also stated in the Decision by the Ministry of Environment and Energy (evidence 2, page 5, point Aa), in the Decision the CRES (evidence 3, page 2, point Aa) and by Annex I of the programme guide (evidence 5) under Section 5.1 (page 30 point 10). In the latter, it is stated that the ‘participating buildings shall, after the interventions, be in the energy category B at least, (...) and ensure at least 30% saving of yearly energy necessary for the technical systems of the building, as well as 30% CO₂ reduction’.

For the Energy upgrade of public sector buildings programme, the legal framework to enable Energy Performance Contracts has been established.

The legal framework enabling Energy Performance Contracts has been established by of Law 4843/2021 (evidence 6). Relevant provisions are included in Articles 7-32 of the same Law.

The measure requires the economic operators carrying out the construction works to ensure that at least 70% (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC of 3 May 2000 replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste (notified under document number C(2000) 1147)) generated on the construction

site shall be prepared for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol.

The Joint Ministerial Decision (JMD) sets out the DNSH requirements (section 1.6, page 25), stating the obligation for the management of non-hazardous construction waste in accordance with national legislation as well as the DNSH principle. Article 6, point 5, of the JMD (evidence 5, page 8) sets out that "... the Beneficiary Body (...) having ensured the correct and legal management (reuse, recycling) of excavation, construction and demolition waste, as well as for the alternative management of waste electrical and electronic equipment must comply with the provisions of Joint Ministerial Decision 23615/651/E.103/2014 (Government Gazette, Series II, No 1184)'. Further, the preambles of the JMDs (evidence 4 and 5) refers to the relevant national legislation, in particular Law 4819/2021 (point 14) and Ministerial Decision 36259/1757/E.103/2010 (point 36), which stipulates that 70% (by weight) of the non-hazardous construction and demolition waste generated on the construction site will be prepared for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials. Ministerial Decision 36259/1757/E.103/2010 also contains provisions that are aligned with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol for the treatment of non-hazardous construction and demolition waste.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: M37 OAKA - Contract award

Related Measure: [16932] Olympic Athletic Center of Athens

Qualitative Indicator: Notification of the award of the contract(s)

Time: Q1 2023

1. Context:

This investment in the Olympic Athletic Centre of Athens (OAKA) shall extend its use life, restore its image, reduce its running/energy costs and ensure its financial sustainability by turning it into a modern and lively urban athletics and leisure destination, with a view to the transfer of OAKA to the Hellenic Corporation of Assets and Participations.

This investment measure needs to comply with specific do-no-significant-harm requirements as concerns the re-use, recycling and other material recovery of the non-hazardous construction and demolition waste, in line with EU legislation and the EU Construction and Demolition Waste Management Protocol.

Milestone 37 requires the notification of the award of the contract(s) for the appointment of private sector partner(s) to carry out the construction and renovation works that shall enhance energy efficiency for (i) Central Stadium; (ii) Mechanical and Electrical works; and (iii) outdoor areas and start of works.

Milestone 37 is the first step of the implementation of the investment, and it will be followed by milestone 39, related to the completion of all works to achieve energy efficiencies and improve carbon footprint. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document dated 01 August 2024 duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Copy of the notification of award of contract for the appointment of private sector partner(s) to carry out the construction and renovation works, dated 16 March 2023	Award Decision Nr. 23AWRD12306036, Protocol Number 25/1941 (Online registration nr: Ψ7H8469H3Π-ΘΦΝ) of the project titled "Energy Improvement of Electromechanical Installations of the Olympic Athletic Center of Athens- OAKA" from the Olympic Athletic Center of Athens to Mytilineos S.A., dated 16 March 2023 (Reference number: 169891)
3	Call of Tenders of Supply & Installation Contract with Open Process through ESIDIS of the project titled "Energy Improvement of Electromechanical Installations of the Olympic Athletic	The call of tenders includes the technical specifications regarding renovation works and energy efficiency for the following: (i) Central Stadium; (ii) Mechanical and Electrical works; and

	Center of Athens- OAKA", dated 3 August 2022	(iii) outdoor areas
4	Official statement by the contractor confirming the start of the works, dated 12 February 2024	Official letter by Mytilineos S.A. (Reference Nr: A-1921) sent to the Olympic Center of Athens, confirming that the start of the works took place in May 2023. Letter is dated: 12 February 2024.
5	Three certificates of final acceptance of delivery and installation of equipment, as follows: 1 st certificate of final acceptance of delivery and installation of equipment concerning the sub-project '8 Energy improvement of electromechanical OAKA installations under protocol no. 7682/15.12.2023, signed by the acceptance of delivery committee of OAKA and by Mytilineos SA 2 nd Certificate of acceptance of delivery of equipment (17 Airconditioning Units), under Protocol No. 149/11.01.2024, signed by the acceptance of delivery committee of OAKA and by Mytilineos SA 3 rd certificate of final acceptance of delivery of equipment (4 Airconditioning Units) under protocol no. 1154/21.02.204, signed by the acceptance of delivery committee of OAKA and by Mytilineos SA	Three certificates of final acceptance of delivery, and in the case of the first certificate the installation of equipment, signed by the delivery committee of OAKA and of the contractor Mytilineos S.A., confirming the receipt and installation of (i) 98 various units (i.e. heating systems, water purification systems, pumps, air conditioning systems) between 24 October and 31 October 2023; (ii) 17 air conditioning units on 3 January 2024; (iii) 4 air conditioning units on 10 January 2024.
6	Notification to awarded company of contract with reference number 169891, in the central electronic registry of public contracts platform	Publication, on 4 May 2023, of notification to awarded company relating to contract hereinabove (see evidence 2) on the platform.

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Notification of the award of the contract(s) for the appointment of private sector partner(s) to carry out the construction and renovation works that shall enhance energy efficiency for (i) Central Stadium; (ii) Mechanical and Electrical works; and (iii) outdoor areas.

The Award Decision of the Olympic Athletic Centre of Athens (OAKA) under evidence 2 indicates at page 5 that the project "Energy Improvement of Electromechanical Installations of the Olympic Athletic Center of Athens - OAKA" was awarded to the private company Mytilineos S.A on 16 March 2023. Mytilineos S.A. was notified about the contract award through the electronic tender management system (evidence 6).

The corresponding technical specifications of the call (evidence 3), dated 3 August 2022, outline the types of construction and renovation works that enhance energy efficiency, as indicated in page 5. In

particular, for (i) the Central Stadium and the (ii) mechanical and electrical works, it includes the improvement of central air-heating installations (as indicated in page 70), the improvement of central air-heating installations (see page 76), the disengagement of the air-heating and office heating installations and other daily operating spaces (see page 100), the replacement of energy-intensive pumps/circulators (see page 103), the replacement of energy-intensive lightning (see page 119), the installation of an Electric Heat Supply Unit (see page 137), and the installation of a Building Management System (see page 158). For the (iii) outdoor areas, the works include the replacement of energy-intensive light bulbs (as indicated in pages 5 and 130).

(...) and start of works.

The letter from the project director of Mytilineos S.A, which is the awarded contractor for the OAKA works (evidence 4), confirms that the agreed construction and renovation works, which enhance energy efficiency for the (i) Central Stadium, (ii) Mechanical and electrical works, and (iii) outdoor areas, started in May 2023.

The contractor's letter is accompanied by three certificates accepting the delivery of equipment (evidence 5), confirming that works on energy improvement of electrical and mechanical facilities of OAKA have started. Corresponding heating systems, water purification systems, pumps, and air conditioning systems were received and installed between October 2023 and January 2024.

The measure requires the economic operators carrying out the construction works to ensure that at least 70% (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC of 3 May 2000 replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste (notified under document number C(2000) 1147)) generated on the construction site shall be prepared for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol.

In line with the description of the measure, the technical specifications of the project outlined in the call (evidence 3) specify in section 4.3.4 (page 60) and the contract template (evidence 3, Article 8.14, page 354) that the awarded contractor *"must carry out any work in a way that does not significantly harm the environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852, taking into account the description of the measure and the mitigation measures foreseen in the recovery and resilience plan in line with the Do No Significant Harm Technical Guidance (2021/C58/01). In particular, according to the measure, economic operators carrying out the construction works must ensure that at least 70 % (by weight) of the non-hazardous construction and demolition waste, excluding the natural materials mentioned to the category 17 05 04 of the European List of Waste established by Decision 2000/532/EC of 3 May 2000, for a substitution of decision 94/3/EC for a the establishment of a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste (notified under document number C (2000) 1147); generated on the construction site shall be prepared for re-use, recycling and other material recovery operations, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol."*

Given that the contract template mentioned above has been drafted in line with the requirements of the public tender, and the applicable legislation, the provisions included therein are binding for both

parties, without the possibility of deviation from the public tender obligations. Hence, the requirements of the milestone are considered satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: M61 Reforestation, restoration and prevention - contracts 1

Related Measure: [16849] National Reforestation Plan, restoration and prevention (“antiNERO”), anti-erosion and flood protection measures

Qualitative Indicator: Notification of award of contracts

Time: Q2 2023

1. Context:

As part of the antiNERO programs, the investment finances fire prevention measures, including forest and woodland clearings and the maintenance of the forest road network and existing fire zones. In addition, the investment includes the creation of mixed fire zones, including logging of trees and shrubs, cleaning and pruning works and planting plants.

Milestone 61 consists of the notification of award of all contracts for Antinero programs I and II for the upgrade of 37500 ha of degraded forest ecosystems, including forest and woodland clearings and the maintenance of the forest road network and existing fire zones.

Milestone 61 is the first step of the implementation of the investment and it will be followed by milestone 62 related to the contract awards for the restoration of 5700 ha of degraded forest ecosystems in Greece through sapling plantings using at least 50% of native species, upgrading and modernization of the four forest nurseries, pilot implementation of the National Reforestation Plan, anti-erosion and anti-flood measures in Evros and Rhodopes; milestone 62a related to the contract awards for Antinero III for the upgrade of 68 000 ha of degraded forest ecosystems; and milestone 63 related to the completion of all works listed in Milestones 62 and 62a. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	28 calls for applications launched by the Ministry of Environment and Energy dated between 17 February 2022 and 28 February 2024	Copies of calls for applications for all the projects within Antinero programs I and II for the upgrade of 37500 ha of degraded forest ecosystems, including forest and woodland clearings and the maintenance of the forest road network and existing fire zones
3	71 notifications of contract award from the Ministry of Environment and Energy dated between 24 March 2022 and 7 March 2024	Award decisions for Antinero programs I and II for the upgrade of 37500 ha of degraded forest ecosystems, including forest and woodland clearings and the

		maintenance of the forest road network and existing fire zones
4	Datasheet covering all the projects within the program antiNERO I	Excel sheet cross-referencing 20 notifications of contract awards with 8 calls of applications, indicating the type of works and the number of hectares per project for all projects within the program Antinero I
5	Datasheet covering all the projects within the program antiNERO II	Excel sheet cross-referencing 51 notifications of contract awards with 20 calls of applications, indicating the type of works and the number of hectares per project for all projects within the program Antinero II
6	Notifications to awarded companies in the central electronic registry of public contracts platform	Publications, between 24 March 2022 and 7 March 2024, of notifications to awarded companies hereinabove (see evidence 3) on the platform.

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Notification of award of all contracts for Antinero programs I and II for the upgrade of 37500 ha of degraded forest ecosystems, including forest and woodland clearings and the maintenance of the forest road network and existing fire zones. Furthermore, in line with the description of the measure, **the investment shall finance fire prevention measures, including forest and woodland clearings and the maintenance of the forest road networks and existing fire zones.**

Both Antinero I and II aim at protecting national forest ecosystems from the increasing threat of wildfires caused by global warming through forest and woodland clearings and the maintenance of the forest road network and existing fire zones. Antinero II serves as an extension of Antinero I, added during the 2023 revision of Greece's Recovery and Resilience Plan.

The primary evidence comprises all notifications of contract award and all calls for applications. The 71 notifications of contract award published by the Ministry of Environment and Energy (evidence 3), dated between 24 March 2022 and 7 March 2024, represent together the upgrade of more than 37500 ha of degraded forest ecosystems and the financing of fire prevention measures, including forest and woodland clearings and the maintenance of the forest road network and existing fire zones. The corresponding 28 calls for applications (evidence 2), dated between 17 February 2022 and 28 February 2024, detail the types of work and the number of hectares covered per respective project. All notifications of award and calls for applications can be identified and linked to each other through unique reference numbers.

The secondary evidence comprises two excel data sheets and serve as overview of all notifications of awards and all calls of applications. The two data sheets (evidence 4 and 5) cross-reference each call for application (column B), number of hectares (columns H to Q), and types of work for all Antinero I and II projects covering forest and woodland clearings and the maintenance of the forest road network

and existing fire zones (column G), as well as the corresponding notifications of award of contracts reference numbers (column D). The total number of hectares to be upgraded amounts to 37703.17 ha (evidence 5, cell I153), which is higher than the target to upgrade 37500 ha of degraded forest ecosystems. The information provided in the data sheets corresponds with the primary evidence (evidence 2 and 3). For example, call 3 covers the “cleaning of forests and forest lands as well as for the maintenance of the forest road network and fire protection zones, in areas under the responsibility of the Forestry Departments of Thessiki, Serres, Sidirokastro, Lagadas, Nigritas, Kilkis and Goumenissa” (evidence 4, B30, G30-G40), which was decided and awarded under reference numbers 187189, 187203, 187204 (evidence 4, D30-D40).

All contractors were notified about the contract awards through an electronic tender management system (evidence 6).

Furthermore, in line with the description of the measure, **the investment shall include the creation of mixed fire zones, including logging of trees and shrubs, cleaning and pruning works and planting plants.**

The notifications of contract award (evidence 3), cross-referenced in the data sheets, include the creation of mixed fire zones, including logging of trees and shrubs, cleaning and pruning works and planting plants (as indicated in the Datasheet that is evidence 4, in rows 18, 19, 27, 30, 39 and 54; as well as indicated in the Datasheet that is evidence 5, in rows 7, 25, 33, 55, 77 and 88). The information provided in the data sheets corresponds with the primary evidence (evidence 2 and 3). For example, call 3 titled “Works of special forestry projects of article 16 par. 5 of Law 998/1979 for the cleaning of forests and forest lands as well as for the maintenance of the forest road network and fire protection zones, in areas under the responsibility of the Forestry Departments of Thessiki, Serres, Sidirokastro, Lagadas, Nigritas, Kilkis and Goumenissa” (evidence 4, B30) decided and awarded under reference number 187189 (evidence 4, D30) covers, among others, the “safe management of logging residues of Western Thessaloniki afforestation” (evidence 4, G30).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: M66 Approval of applications for water infrastructures

Related Measure: [16850], Drinking Water Supply and Saving Infrastructures

Qualitative Indicator: Applications approved by the Ministry of Environment and Energy

Time: Q2 2023

1. Context:

The investment aims to improve the availability and quality of drinking water and reduce leakage and public health risks related to water infrastructure and consists of three sub-projects: (a) construction of new water supply infrastructures in at least seven areas and at least three desalination plants, (b) establishment of telemetry - remote control systems for the detection of leaks in water supply networks, and (c) procurement of digital hydrometers.

It is expected that the investment does not do significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852, taking into account the description of the measure and the mitigating steps set out in the recovery and resilience plan in accordance with the Do No Significant Harm Technical Guidance (2021/C58/01). In particular, the investment is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU, as well as relevant assessments in the context of Directive 2000/60/EC and Directive 92/43/EEC, including the implementation of required mitigation measures.

The milestone concerns the issuance of a call of interest for water infrastructure projects, to include the following requirements: (i) for newly constructed systems to have an Infrastructure Leakage Index (ILI) that shall be less or equal to 1,5 (ii) for renovation activities to decrease the leakage by more than 20% or to decrease the average energy consumption by more than 20% and (iii) for desalination plants to be connected to renewable energy sources and to have an average energy consumption that shall be less or equal to 0,5 kWh. The milestone also concerns the approval of applications for water infrastructures by the Ministry of Environment and Energy.

Milestone 66 is the first step of the implementation of the investment, and it will be followed by milestones 71 and 74, related to the completion of 50% for the value of the water infrastructure projects and the completion of all water infrastructure projects respectively. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone requirements (including all the constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	

2	Call for proposals No. 80480/1955 issued by the Ministry of Environment and Energy on 4 August 2022 (ADA: ΩΥ5Μ4653Π8-ΡΚΖ)	Call for the submission of 'Drinking Water Supply and Saving Infrastructures' applications by local authorities and Water Services Providers owned by Municipalities, comprising four lots / sub-projects: (1) water supply infrastructures (2) desalination plants (3) telemetry - remote control systems for the detection of leaks in water supply networks, and (4) procurement of digital hydrometers.
3	Call for proposals No. 88397/2127 issued by the Ministry of Environment and Energy on 4 August 2022 (ADA: ΨΗΔ14653Π8-5ΗΓ)	Revised Call for proposals text introducing modifications to the Call in evidence (2) above, extending the deadline for submission of applications by 21 days, to 30 September 2022
4	Joint Ministerial Decision of the Minister of Environment and Energy and the Alternate Minister of Economy and Finance, No. 58524/1492 issued on 30 May 2024 (ΑΔΑ: ΡΔΩ04653Π8-Π9Χ)	Joint Ministerial Decision listing the 81 approved applications of Municipalities and Municipal Water and Wastewater service providers

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

The investment consists of three sub-projects: (a) construction of new water supply infrastructures in at least seven areas and at least three desalination plants, (b) establishment of telemetry - remote control systems for the detection of leaks in water supply networks, and (c) procurement of digital hydrometers.

Issuance of a call of interest for water infrastructure projects, to include the following requirements: (i) for newly constructed systems to have an Infrastructure Leakage Index (ILI) that shall be less or equal to 1,5

(ii) for renovation activities to decrease the leakage by more than 20% or to decrease the average energy consumption by more than 20% and

(iii) for desalination plants to be connected to renewable energy sources and to have an average energy consumption that shall be less or equal to 0,5 kWh.

The Ministry of Environment and Energy issued on 4 August the Call for Proposals No. 80480/1955 (evidence 2) modified on the same date by the Call for Proposals No. 88397/2127 (evidence 3) inviting the submission of applications in the following four categories:

(A) water supply infrastructures

(B) telemetry - remote control projects to detect leakages in a water supply network

(C) digital water meters, and

(D) desalination plants covering the three sub-projects set in the measure description, namely:

- i. construction of new water supply infrastructures, to be covered by the approved project applications received under the categories (A) and (D) of the Call for Proposals

- ii. establishment of telemetry - remote control systems for the detection of leaks in water supply networks, to be covered by the approved project applications received under category (B) of the Call for Proposals and
- iii. procurement of digital hydrometers, to be covered by the approved project applications received under category (C) of the Call for Proposals.

On pages 5 and 6 of the Call for proposals (evidence 2 and 3), the description of the infrastructure projects supported under the Call stipulated, inter alia, the following:

- the new water supply systems and digital hydrometers' systems should have an Infrastructure Leakage Index (ILI) that shall be less or equal to 1,5
- the renovation activities should decrease the leakage by more than 20%
- the desalination plants should be connected to renewable energy sources and have an average energy consumption that shall be less or equal to 0,5 kWh.

Applications approved by the Ministry of Environment and Energy

The Joint Ministerial Decision of the Minister of Environment and Energy and the Alternate Minister of Economy and Finance No. 58524/1492 (evidence 4) lists the 81 approved applications of Municipalities and Municipal Water and Wastewater service providers to be supported under this measure.

The investment sub-project (a) provides for the construction of new water supply infrastructures in at least seven areas and at least three desalination plants

Pages 6 to 11 of the Joint Ministerial Decision of the Minister of Environment and Energy and the Alternate Minister of Economy and Finance No. 58524/1492 (evidence 4) lists 81 approved applications including:

- seven new water supply infrastructures
 - No. 3 water supply infrastructure Paliou
 - No. 13 water supply infrastructure Veniza-Loumpa
 - No. 14 water supply infrastructure Mytika
 - No. 17 water supply infrastructure Kythira
 - No. 24 water supply infrastructure Ligias
 - No. 45 water supply infrastructure Sevastianon & Mavrovouniou
 - No. 53 water supply infrastructure Karitsas/Diou/Olympou
- three desalination plants
 - No. 64 desalination plant in Krotiri, Paros
 - No. 70 desalination plant Isthmias
 - No. 71 desalination plant Agion Theodoron

It is expected that this measure does not do significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852, taking into account the description of the measure and the mitigating steps set out in the recovery and resilience plan in accordance with the Do No Significant Harm Technical Guidance (2021/C58/01). In particular, the measure is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU, as well as relevant assessments in the context of Directive 2000/60/EC and Directive 92/43/EEC, including the implementation of required mitigation measures.

Page 7 of the Call for Proposals No. 80480/1955 (evidence 2) modified on the same date by the Call for Proposals No. 88397/2127 (evidence 3) inviting the submission of applications stipulated that the operations under the Call should lead to compliance with the 'Do No Significant Harm' (DNSH) rule, namely that this measure will not significantly harm environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852, taking into account the description of the measure and the mitigation measures set out in the recovery and resilience plan and in line with the Technical Guidance on addressing no significant harm (2021/C58/01) and, in particular, that the measure is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU, as well as to relevant assessments in the context of Directive 2000/60/EC and Directive 92/43/EEC, including the implementation of required mitigation measures.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: M87 Award of contract(s) for the ‘Small Satellites’ project

Related Measure: [16855] Small-satellites

Qualitative Indicator: Notification of award of contract(s)

Time: Q2 2023

1. Context:

The investment concerns the development of a constellation of small satellites that will support connectivity services, as well as earth observation applications in the fields of mapping, shipping, precision agriculture, spatial planning and others. The main objectives of this investment are to enhance Greek capabilities in satellite technologies and applications, to foster the use of space data by the Greek authorities and enable potential future European cooperation through shared use of infrastructure and space data exchanges.

Milestone 87 consists of the notification of the award of contract(s) following the successful completion of the tender process for the so-called ‘Small Satellites’ project. Milestone 87 is the first step of the implementation of the investment, and it will be followed by target 92 which envisages that the Pilot Project starts routine operations and that the Small Satellites constellation is launched and put in orbit. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Copy of the Implementation Plan dated 22 March 2022 of the Project Arrangement for ESA’s Assistance in the management and implementation of the Greek National Satellite Space Project	Implementation Plan of the Project Arrangement for ESA’s Assistance on the Greek National Satellite Space Project
3	Copy of the amendment of the Implementation Plan dated 12 June 2024 of the Project Arrangement for ESA’s Assistance in the management and implementation of the Greek National Satellite Space Project	Amendment of the Implementation Plan of the Project Arrangement for ESA’s Assistance on the Greek National Satellite Space Project
4	Copy of ESA’s Adjudication report of 18 July 2024 confirming the completion of the procurement process and the adjudication of all activities related to the Connectivity & Secure Communications (CSC) component of the Greek National Space Project	ESA Adjudication report on all activities related to the Telecommunications (CSC) component of the Greek National Space Project
5	Copy of ESA’s Adjudication report of 28 June 2024 confirming the completion of the procurement process and the adjudication of all activities related to the Earth Observation component of the Greek National Space Project	ESA Adjudication report on all activities related to the Earth Observation component of the Greek National Space Project

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Award of contract(s) following the successful completion of the tender process for the ‘Small Satellites’ project.

As presented in the amendment of the Implementation Plan dated 12 June 2024 of the Project Arrangement for ESA’s Assistance in the management and implementation of the Greek National Satellite Space Project (evidence 3), the ‘Small satellites’ investment consists of the following sub-projects:

- The **‘Greek Cubesats In-Orbit validation’ sub-project**, which encompasses seven projects related to the development of a batch of small satellites (cube-satellites) for educational purposes, and in orbit demonstration of secured connectivity functions and multi-applications (In Orbit Demonstration (IOD) and In Orbit Validation (IOV)). The seven projects part of the ‘Greek Cubesats In-Orbit validation’ sub-project are (i) the ‘PHASMA Mission’, (ii) the DUTHSat-2 mission, (iii) the MICE-1 Mission, (iv) the OptiSat mission, (v) the PeakSat mission, (vi) the Ermis mission and the (vii) Hellenic Space Dawn mission;
- The **‘Hellenic Assembly and Integration and Testing Facility’ (HAITF) sub-project**, which consists in the development of a national Assembly and Integration Test (AIT) facilities within the Hellenic Aerospace Industries site in Tanagra which will be able to support the assembly and test of cube satellites and small satellites in Greece;
- The **‘Greek connectivity Optical Ground Stations (OGS)’ sub-project**, which consists in the development of an Optical Ground Station network to contribute to a European network of high data rate direct to earth Optical communication increasing the site diversity in Europe and therefore the availability of such links for a wide range of space systems;
- The **‘Hellenic Space Tracking Radar (HSTR)’ sub-project**, which consists in the development of a radar tracking station to contribute to building a European space situation awareness capability;
- The **Earth Observation component**, which consists in the following 9 sub-projects:
 - The **‘Axis 1.1 Thermal Space Segment’ sub-project**, which consists in the development of radar and Thermal Infrared (TIR) satellites and parallel acquisition of imaging capacity to answer to the most urgent needs of disaster detection monitoring such as floods and wildfires;
 - The **‘Axis 1.2 SAR Space Segment’ sub-project**, which consists in the deployment and launch of a constellation of minimum two satellites with high resolution Synthetic Aperture Radar (SAR) imaging observation capability over the Greek Area of Interest (AOI), with the main end users being the Greek Ministry of Civil Protection and Climate Crisis and the Hellenic Fire Service;
 - The **‘Axis 2 Greek Constellation of satellites sub-project’**, which aims at developing the capacity to design and develop SmallSats in Greece, and at providing observation capabilities over the Greek Area of Interest (AOI) by developing a metric optical Earth Observation (EO) constellation for agriculture, environmental monitoring, land use monitoring, maritime surveillance and security applications;
 - The **‘Axis 3 Governmental Hub’ sub-project**, which consists in the development of a central digital governmental system to ensure access, storage, and dissemination of space data and provide secure and reliable access to added valued services, such as Analysis-ready data, Geospatial data and Governmental Services on the basis of Axis 1 and Axis 2

sub-projects, to public and private users. The sub-project also encompasses five different sub-projects:

- The **'Axis 3 Agriculture Monitoring Service' sub-project**, which consists in activities of crop-type mapping, per-crop estimation of biophysical parameters and soil moisture estimation;
- The **'Axis 3 Forest Monitoring Service' sub-project**, which consists in activities of forest-type and tree cover density, fuel mapping and density change detection;
- The **'Axis 3 Water Monitoring Service' sub-project**, which consists in activities of water quantity monitoring, water quality monitoring; traffic monitoring, port/supply chain monitoring;
- The **'Axis 3 Safety and Security Monitoring Service' sub-project**, which consists in activities of target identification, fire hotspot detection and risk assessment, deformation monitoring;
- The **'Axis 3 Land Monitoring Service' sub-project**, which consists in activities of land use/cover mapping, biodiversity mapping, multi-temporal change detection, urban analytics and cultural heritage monitoring.

ESA is undertaking the management of all technical and contractual aspects of the investment, acting as the contracting authority on behalf of the Greek authorities. ESA is thus responsible for the procurement relating to the investment and for the conclusion of the corresponding industrial contracts with the selected industrial and research entities who will carry out the implementation of the contracts. The investment is therefore implemented through contracts between ESA and industrial and research entities. The tendering procedures for the award of these contracts were carried out in accordance with the ESA Procurement Regulations.

The evidence submitted by Greece demonstrates that all contracts part of the 'Small Satellites' project presented above have been awarded by the ESA following the successful completion of the associated tender processes. In particular:

1. As concerns the various sub-projects part of the **Connectivity & Secure Communications (CSC) component**, as presented in ESA's Adjudication report of 18 July 2024 (evidence 4) confirming the completion of the procurement process and the adjudication of all activities related to the CSC component of the Greek National Space Project:
 - 1.1. The tender evaluation boards (TEB) for the seven 'Greek Cubesats In-Orbit validation' sub-projects took place on 9 and 19 December 2023, and the contracts were awarded on 23, 24 and 26 January 2024;
 - 1.2. The tender evaluation board (TEB) for the 'Hellenic Assembly and Integration and Testing Facility' (HAITF) sub-project took place on 24 May 2023, and the contracts were awarded on 17 April 2024;
 - 1.3. The tender evaluation board (TEB) for the 'Greek connectivity Optical Ground Stations (OGS)' sub-project took place on 21 November 2023, and the contracts were awarded on 7 December 2023;
 - 1.4. The tender evaluation board (TEB) for the 'Hellenic Space Tracking Radar (HSTR)' sub-project took place on 11 May 2023, and the contracts were awarded on 16 June 2023.
2. As concerns the various sub-projects part of the **Earth Observation component**, as presented in ESA's Adjudication report of 28 June 2024 (evidence 5) confirming the completion of the procurement process and the adjudication of all activities related to the Earth Observation component of the Greek National Space Project:

- 2.1. The tender evaluation board (TEB) for the 'Axis 1.1 Thermal Space Segment' sub-project took place on 18 April 2024, and the contract was awarded on 8 May 2024;
- 2.2. The tender evaluation board for the 'Axis 1.2 SAR Space Segment' sub-project took place on 18 April 2024, and the contract was awarded on 7 May 2024;
- 2.3. The tender evaluation board for the 'Axis 2 Greek Constellation of satellites' sub-project took place on 28 March 2024, and the contract was awarded on 18 April 2024;
- 2.4. The tender evaluation board for the 'Axis 3 Governmental Hub' sub-project took place on 20 June 2024 and the contract was awarded on 24 June 2024;
- 2.5. The tender evaluation board for the 'Axis 3 Agriculture Monitoring Service' sub-project took place on 25 June 2024 and the contract was awarded on 26 June 2024;
- 2.6. The tender evaluation board for the 'Axis 3 Forest Monitoring Service' sub-project took place on 26 June 2024 and the contract was awarded on 27 June 2024;
- 2.7. The tender evaluation board for the 'Axis 3 Water Monitoring Service' sub-project took place on 25 June 2024 and the contract was awarded on 26 June 2024;
- 2.8. The tender evaluation board for the 'Axis 3 Safety and Security Monitoring Service' sub-project took place on 21 June 2024 and the contract was awarded on 24 June 2024;
- 2.9. The tender evaluation board for the 'Axis 3 Land Monitoring Service' sub-project took place on 21 June 2024 and the contract was awarded on 25 June 2024.

The investment concerns the development of a constellation of small satellites that shall support connectivity services, as well as earth observation applications in the fields of mapping, shipping, precision agriculture, spatial planning and others.

In line with the description of the measure in the CID Annex, the measure concerns the development of a constellation of small satellites that supports:

- (i) connectivity services, notably via
 - a. the 'Greek Cubesats In-Orbit validation' sub-project which, as presented in section 2.1 of the amendment of the Implementation Plan dated 12 June 2024 (evidence 3), aims inter alia to design, build, test, launch and operate up to 12 small satellites ('CubeSats') hosting multiple payloads, primary for secure connectivity (telecom) and secondary for Earth Observation applications. In particular, as explained in sections 2.1.4, 2.1.5, 2.1.6 and 2.1.7 of the Implementation Plan, the small satellites meant to be launched in the context of the OptiSat, PeakSat, Ermis and Hellenic Space Dawn missions will inter alia provide secure connectivity via laser-optical or inter-satellite links;
 - b. the 'Greek connectivity Optical Ground Stations (OGS)' sub-project which, as presented in section 2.3 of the amendment of the Implementation Plan dated 12 June 2024 (evidence 3), aims mainly to convert three astronomical sites in Greece into optical ground stations (OGS) that will support future European and National Space projects addressing Secure Connectivity and/or Quantum Key Distribution needs.
- (ii) earth observation applications in the fields of mapping, shipping, precision agriculture, spatial planning and others, notably through the various sub-projects part of the Earth Observation component, as presented in section 2.5 of the amendment of the Implementation Plan dated 12 June 2024 (evidence 3).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: M135 DYPA Digitisation, storage and filing of archives

Related Measure: [16942] Digital Transformation of the Public Employment Service (DYPA)

Qualitative Indicator: Certificate of acceptance of deliverables of project

Time: Q4 2023

1. Context:

The investment focuses on the digital transformation of the public employment service (DYPA), with a view to increasing effectiveness of offered services. Notably, among other things, the investment shall undertake the digitisation, storage and filing of archives of DYPA. The above investment aims to lead to a better data management and decision-making system, maximization of resources and higher customer satisfaction.

The milestone concerns the completion of the digitisation, storage and filing of DYPA archives.

Milestone 135 is the first step of the implementation of the investment and it will be followed by milestone 135a, related to the completion of the digital transformation of the Public Employment Service through a different set of measures (e.g., purchase of IT systems, redesign of some of the current operating systems of DYPA, the expansion of digital services via DYPA App and the creation of a tool to help the Public Employment Service optimize the labour supply-demand matching process). The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Call for tenders No 10/2022 (Reference number: 620866) regarding the digitisation, storage and filing of archives of the Public Employment Service (DYPA) with registration (ADAM) number 22PROC010971418–2022-07-20, dated 19 July 2022	The call for tenders dated 19 July 2022 concerns an open electronic international competition launched by the Ministry of Labour and Social Affairs asking for the submission of applications of interest until 26 August 2022 by potential contractors for undertaking a project of a duration of 12 months aimed at the digitisation, storage and filing of archives of DYPA
3	Contract No 24/23 regarding the digitisation, storage and filing of archives of DYPA, with registration (ADAM) number	The contract was signed on 23 May 2023 by DYPA (acting under the supervision of the Ministry of Labour and Social Affairs) and IRON MOUNTAIN HELLAS S.A (the selected

	23SYMV013073738 2023-07-13, dated 23 May 2023	contractor). The contract envisaged the completion within 12 months of the digitisation, storage and filing of archives of DYPA as described in the call for tenders of 19 July 2022 (the Project)
4	Certificate of acceptance of the deliverables of the Project by the three-member Project Monitoring and Receipt Committee of DYPA, dated 22 December 2023	The certificate dated 22 December 2023 corresponds to a decision by the three-member Project Monitoring and Receipt Committee on the final receipt of the Project deliverables as per the contract of 23 May 2023
5	Report by DYPA No 651248, dated 4 June 2024	The report dated 4 June 2024 is signed by the Governor of DYPA and confirms the completion of digitisation of 8 000 000 A3/A4 pages of DYPA archives and the development of an information system for the storage and filing of these archives.
6	Link to the relevant digital database of DYPA archives https://edms.dypa.gov.gr/enVision/Login.aspx?R=638436946050599294	The Content Management System is an information system where the digitised archives are stored and filed. Files are classified into five broad categories: (a) Loans; (b) Land register; (c) Concessions; (d) Staff documents; (e) Archives of the Procurement Department of the Public Employment Service

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

‘The completion of the digitisation, storage and filing of DYPA archives’, as set out in the milestone and measure description is met by:

- Evidence 2. In particular, the call for tenders concerns an open electronic international competition launched by the Ministry of Labour and Social Affairs for the submission of applications of interest until 26 August 2022 by potential contractors for undertaking a project of a duration of 12 months aimed at ‘the digitisation, storage and filing of archives of DYPA’ (as indicated on page 1 of the call for tenders). In particular, according to Annex I to the call for tenders (as indicated on page 82), the Project concerns the digitisation of at least 8 000 000 pages of A4 or A3 size of the physical archives of DYPA, as well as the development of an information system in which these archives will be stored and updated and become accessible to the staff of DYPA. The Project also provides the following: a) Services for the analysis of requirements and design of the services provided, and an implementation study; b) Scanning services (reception, management, visual identification, scanning, documentation of scanning data, return of physical file); c) Services for the registration of transcripts on scanned documents; and d) Development services for an information system ensuring also the maintenance and management of the digitised archives (as indicated on page 82). According to Annex III to the call for tenders (page 95 of the call for tenders), the deliverables of the Project include: a) Implementation Study, b) Development and deployment of Information System for managing the digitised material, c) Scanning and registration processing of metadata, and d) Training of users and administrators and pilot implementation.
- Evidence 3. In particular, the contract No 24/23 was signed between DYPA under the supervision of the Ministry of Labour and Social Affairs and IRON MOUNTAIN HELLAS S.A. (the selected contractor) and envisaged the completion within 12 months of the digitisation,

storage and filing of archives of DYPA as per the call for tenders of 19 July 2022 referred above (as indicated on pages 1-3).

- Evidence 4. In particular, the certificate of acceptance of the deliverables of the Project (page 1) corresponds to a decision by the three-member Project Monitoring and Receipt Committee on the final receipt of the project deliverables as per the signed contract of 23 May 2023.
- Evidence 5. In particular, the report (page 1) confirms the completion of the digitisation of 8 000 000 pages A3/A4 of archives of DYPA that corresponds to a large part of DYPA's archives. According to the report, the Project includes the digitisation of the archives of selected Directorates of DYPA, namely the archives of borrowers and residents of the former Worker's Housing Association (OEK) that was merged into DYPA, the procurement files, the land register files of the Agency and the human resource files. The Project also includes the development of an information system in which these data will be kept and updated in full electronic form, to which DYPA staff may have access.
- Evidence 6. In particular, the link to the relevant digital database of DYPA archives (<https://edms.dypa.gov.gr/enVision/Login.aspx?R=638436946050599294>) shows that the Content Management System is an information system where the digitised archives are stored and filed. In particular, archives are classified into five broad categories: (a) Loans; (b) Land register files; (c) Concession files; (d) Human resource documents; (e) Archives of the Procurement Department of the Public Employment Service.

The fact that 'the investment focuses on the digital transformation of the public employment service (DYPA), with a view to increasing effectiveness of offered services', as set out in the measure description is met by:

The above supporting evidence 2 and 5, in particular:

- Evidence 2. In particular, the call for tenders concerns an open electronic international competition launched by the Ministry of Labour and Social Affairs for the submission of applications of interest until 26 August 2022 by potential contractors for undertaking a project of a duration of 12 months aimed at 'the digitisation, storage and filing of archives of DYPA' (as indicated on page 1 of the call for tenders). In particular, according to Annex I to the call for tenders (as indicated on page 82), the Project concerns the digitisation of at least 8 000 000 pages of A4 or A3 size of the physical archives of DYPA, as well as the development of an information system in which these archives will be stored and updated and become accessible to the staff of DYPA. In particular, the overall purpose of the Project is a) to design and set up a new centralised digital file that will replace the existing paper files of DYPA, and b) to develop an IT system for the management of the digital file that will result for the digitisation. Once the project has been implemented, time-consuming and lengthy searches of paper files will no longer be necessary and be replaced by searches of digitised files in the new Information system to be developed under the Project (as indicated on page 83). The Project also provides the following: a) services for the analysis of requirements and design of the services provided, and an implementation study; b) scanning services (reception, management, visual identification, scanning, documentation of scanning data, return of physical file); c) services for the registration of transcripts on scanned documents; and d) development services for an information system ensuring also the maintenance and management of the digitised archives (as indicated on page 82). According to Annex III to the call for tenders (page 95 of the call for tenders), the deliverables of the Project include the following: a) implementation Study; b) development and deployment of Information System for managing the digitised material, c) scanning and registration processing of metadata, and d) training of users and administrators and pilot implementation.

- Evidence 5. In particular, the report (page 1) confirms the completion of the digitisation of 8 000 000 pages A3/A4 of archives of DYPA that corresponds to a large part of DYPA's archives. In particular, the Project includes the digitisation of the archives of selected Directorates of DYPA, namely the archives of borrowers and residents of the former Worker's Housing Association (OEK) that was merged into DYPA, the procurement files, the land register files of the Agency and the human resource files. The Project also includes the development of an information system in which these data will be kept and updated in full electronic form, to which DYPA staff may have access.

The above evidence proves the digitisation, storage and filing of a large share of the archives of DYPA and the creation of an information system for that purpose. DYPA staff will have access to the system and be trained to use it. Combined with the various new and redesigned Information Systems and digital tools that are envisaged under the measure and are aimed at the digital transformation of the public employment service, the information system that is relevant for the digitisation, storage and filing of DYPA archives is expected to help DYPA manage its data in a better way, strengthen its decision-making system, maximize utilization of resources, better serve its beneficiaries, and provide timely and accurate information to policy makers and the broader public, thereby leading to increased effectiveness of the services that DYPA offers.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: M143 VET quality control system contract award

Related Measure: [16792] Labor force skilling, reskilling and upskilling through a reformed training model (Vocational Education & Training Reform)

Qualitative Indicator: Notification of award of contract

Time: Q2 2023

1. Context:

The reform aims at (1) improving quality control (such as evaluation systems tracking progress and performance of trainees) in the public employment service's (DYPA) vocational training units, (2) updating their modules in accordance to current and future labour market needs, as part of the comprehensive reform of DYPA's active labour market policies (ALMPs) and (3) promoting e-learning and digitisation of training content (this is coupled with investment in renovations of laboratories and equipment supply).

Milestone 143 requires the contract award for the quality control system for vocational education and training (VET) aimed to improve quality control over the vocational training units of the Public Employment Service (DYPA), mostly through assessing its output and tracking progress and performance of trainees in the labour market.

Milestone 143 is the first step of the implementation of the reform, and it will be followed by milestone 146, related to the completion of the following projects: a) VET quality control system aimed to improve quality control over the vocational training units of the national Employment Organization (DYPA); b) Completion of the updating of the training modules of the Public Employment Service's (DYPA) vocational training units, as part of the comprehensive reform of DYPA's active labour market policies; c) Completion of development of digital courses; and d) Completion of renovations of laboratories of VET Schools and of the related equipment.

The reform has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	

2	<p>Call for tenders No 451545 (registration (ADA number: ΨΛΔΙ4691Ω2-ΛΚΑ) for the selection of a contractor, dated 19 April 2023, available at: https://diavgeia.gov.gr/doc/%CE%A8%CE%9B%CE%94%CE%994691%CE%A92-%CE%9B%CE%9A%CE%91?inline=true</p>	<p>The call for tenders dated 19 April 2023 concerns a project for improving the quality control of DYPA in the Vocational Education and Training (VET) units - Digital Data Analysis System for the monitoring of VET (Vet Tracking information system)</p>
3	<p>DYPA's Board of Directors Decision no 65, dated 18 July 2023 (ΑΔΑ: ΨΤ9Α4691Ω2-93Ξ), available at: https://diavgeia.gov.gr/doc/%CE%A8%CE%A49%CE%914691%CE%A92-93%CE%9E?inline=true</p>	<p>The Decision a) approves the minutes No 78/78/13-7-2023 of the Public Procurement Committee of the Public Employment Service; b) accepts the submitted certificates on the basis of their validity, completeness and compliance with law; c) validates the result of the open electronic call for tenders as final concerning the selection of the contractor to be responsible for the improvement of the quality control of the Vocational Education and Training (VET) units of the Public Employment Service (DYPA) - Digital Data Analysis System for the monitoring of VET (Α.Σ. 191408) (ΟΠΣ ΤΑ 5161358)</p>
4	<p>Invitation letter No 983891 of 31 August 2023 by the Public Procurement Department of the Public Employment Service (DYPA) to the contractor asking them to sign the contract</p>	<p>The invitation a) informs the contractor of the DYPA's Board of Directors Decision no 65/18 July 2023 on the validation of the result of the open electronic call for tenders as final, b) informs that, according to Law 4412/2016 (par. 5 of Article 105), with the receipt of the invitation letter the contract is considered concluded and c) invites the contractor to sign the contract within 15 days</p>

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

In line with the description of the milestone:

Contract award for the quality control system for vocational education and training (VET) (...)

- Evidence 3. In particular, DYPA's Board of Directors Decision that: a) approves the minutes No 78/78/13-7-2023 of the Public Procurement Committee of the Public Employment Service concerning the selection of the contractor; b) accepts the eligibility certificates and other supporting evidence submitted by the contractor taking into consideration their validity, completeness and compliance with the law; and c) validates the result of the open electronic call for tenders and the selected contractor as final (as indicated on pages 1 and 2).
- Evidence 4. In particular, the invitation letter (page 1) to the contractor asking them to sign the contract. The invitation letter a) informs the contractor of the DYPA's Board of

Directors Decision no 65 of 18 July 2023 on the validation of the result of the open electronic call for tenders and the selected contractor as final, b) informs that, according to Law 4412/2016 (par. 5 of Article 105), with the receipt of the invitation letter the contract is considered concluded, and c) invites the contractor to sign the contract within 15 days.

(...) aimed to improve quality control over the vocational training units of the Hellenic Manpower Employment Organisation (DYPA) (...)

- Evidence 2. In particular, section 2 of the Annex of the call for tenders (as indicated in pages 77-79), describes the state of play regarding VET in Greece (e.g. featuring fragmented databases and analyses and the lack on a single digital information system collecting all available data on the progress of VET graduates in the labour market to allow the assessment of the effectiveness its skills development systems). Section 3 of the Annex of the call for tenders (as indicated in pages 79-80) and Section 5 (as indicated in pages 84-85) provides the technical specifications to address the shortcoming of the VET system, i.e. a Digital Data Analysis System (VET tracking Information System) as a digital tool for processing labour market data and monitoring outcomes of VET units. Based on the technical specifications in Section 5 (pages 84-85), the new system will facilitate the timely and systematic availability and analysis of data on the labour market performance of VET graduates and to contribute to improved VET training units and will allow for a holistic and more effective decision making on VET and labour market policies, including through the (re)design of training programmes according to arising needs. As such, the new system meets the measure's primary objective to aim at improving the quality control over the vocational training units of the Hellenic Manpower Employment Organisation (DYPA).

(...) mostly through assessing its output and tracking progress and performance of trainees in the labour market

- Evidence 2. In particular, Section 5 of the Annex of the call for tenders (as indicated in pages 84-85) describing the technical specifications of the Digital Data Analysis System (VET tracking Information System) entails that the new VET tracking System will facilitate the timely and systematic availability of data on existing VET units, their curricula and the progress and evolution of their training graduates. As per the technical specifications in Section 5, among other features, the system will facilitate the availability of up-to-date quantitative (outputs included) and qualitative information on the labour market situation of VET graduates in the labour market. This will contribute to a systematic and effective coordination of VET to the needs of the labour market.
- Evidence 3. In particular, in the "Letter of Clarification" of 2 June 2023, the contractor confirms the project focus on effective monitoring of beneficiaries, even after their participation in VET trainings, addressing the need for DYPA to be able to thoroughly investigate and analyse the characteristics of the training participants next to those included in the unemployment register.

3. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: T154 Clawback decrease 50 000 000 - step 1

Related Measure: [16816] Reforms and acceleration of investments in the Healthcare Sector - Clawback reduction and rationalization of healthcare expenditure

Quantitative Indicator: Decrease in the amount of clawback compared with the 2020 levels (EUR million)

Baseline: 0

Target: EUR 50 000 000

Time: Q2 2023

1. Context:

The measure requires the achievement of a gradual reduction of clawback amounts during the years 2022-2025 from the 2020 levels, through the full enforcement of previously adopted and new efficiency-enhancing measures.

Target 154 requires achieving a reduction of the 2022 pharmaceutical clawback for outpatient and inpatient pharmaceuticals by EUR 50 000 000 compared with the 2020 levels. To the extent that this is not achieved, the difference between the targeted reduction and the actual reduction for each year shall not be clawed back from the pharmaceutical industry and the relevant amount shall be borne by the state budget up to EUR 50 000 000.

Target 154 is the second target of the reform, and it follows the completion of milestone 153, related to the entry into force of the legal framework (primary law) for risk sharing in the calculation of the clawback by setting a binding target of clawback reduction over the next years. It will be followed by targets 155, 156, 157, and 158. Targets 155, 157 and 158 relate to achieving a minimum reduction of the pharmaceutical clawback by EUR 150 000 000 (in 2023), EUR 300 000 000 (in 2024) and EUR 400 000 000 (in 2025) compared to the 2020 levels. To the extent that this is not achieved, the difference between the targeted reduction and the actual reduction for each year shall not be clawed back from the pharmaceutical industry and the relevant amount shall be borne by the state budget up to the targeted reduction in the clawback amounts. Finally, target 156 relates to carrying out investments in pharmaceuticals R&D for an amount of up to EUR 250 000 000, through offsetting clawbacks of the years 2021, 2022 and 2023.

The reform has a final expected date for implementation on 30 June 2026.

2. Evidence provided:

In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
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1	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Report by the Ministry of Health	The report dated 20 March 2024 is signed by the Secretary-General for Strategic Planning of the Ministry of Health. It describes the new structural measures taken to reduce the clawback in 2022 compared to 2020 and it confirms that the reduction in the pharmaceuticals clawback for 2022 amounted to EUR 74 700 000 compared to the 2020 level.
3	Validation letter by the Minister of Health	The document dated 3 June 2024 is signed by the Minister of Health and validates the Report of 20 March 2024 of the Secretary-General for Strategic Planning
4	Certificate by the National Organization for Health Care Services (EOPYY) of the Ministry of Health No 30775	The certificate dated 29 November 2023 is issued by the General Directorate of Financial Services (Directorate of Finance) and confirms the clawback amounts on the pharmaceutical spending of the National Organization for Health Care Services (EOPYY) for years 2020 and 2022
5	Note by the Ministry of Health	The note dated 19 December 2023 is issued by the General Directorate of Financial Services (Directorate of Budget and Budgetary Reporting) and confirms the clawback amount on the pharmaceutical spending of hospitals for the year 2022

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target.

Enforce previously adopted efficiency enhancing measures

This CID requirement is met by evidence 2 (page 1-7) and evidence 3 (pages 1-2) that confirm that several administrative and legislative measures were taken to rationalise pharmaceutical expenditure. These measures focused on negotiations on drug price discounts and on implementing drug consumption controls. They included the following and were enforced as described below:

1. The implementation of closed budgets for High-Cost Medicines (HCM) and other medicines (49% of the budget for HCM and 51% for all other medicines) aimed to rationalize the expenditure of specific

medicines at molecular or therapeutic level by forecasting demand for those medicines based on historical data and by setting an annual ceiling on this expenditure.

2. The completion and signing of more than 556 agreements by the Drug Price Negotiation Committee that was set up by Law 4512/2018 (article 254) and which resulted in significant drug price discounts.

3. The establishment and implementation of re-pricing based on the average of the two lowest different euro-area prices for all pharmaceutical products other than generics, and the application of a 7% price reduction for all pharmaceutical products with the possibility of a second re-pricing within the same year.

4. The application of strict criteria for the distribution of medicines of low therapeutic value such as vitamins magnesium, and iron, which resulted in a reduction of the budget for those medicines by EUR 80 million for 2022 (from EUR 120 million to EUR 40 million).

5. The introduction of a clawback cap on very cheap hospital medicines to avoid their substitution by more expensive medicines, while contributing to their commercial viability.

6. The completion and signing of central procurement contracts by the National Centralised Public Health Procurement Authority (EKAPY) for a total amount of more than EUR 160 million.

7. The nomination and implementation of a Central Digital Hospital Drug Procurement System by EKAPY, for the ordering and reimbursement of central tender contracts and agreements of the Drug Price Negotiation Committee that has contributed to a reduction in pharmaceutical expenditure.

Achieve a reduction of the 2022 pharmaceutical clawback both for outpatient and inpatient pharmaceuticals by EUR 50 000 000 compared with the 2020 levels.

This CID requirement is met by the following supporting evidence:

- Evidence 2. In particular, the report of 20 March 2024 by the Ministry of Health confirms that the clawback on pharmaceutical spending of hospitals amounted to EUR 389 754 995.89 in 2022, compared to EUR 360 000 000 in 2020, which corresponds to an increase of EUR 29 754 995.89. At the same time, the report confirms that the clawback on pharmaceutical spending of the National Organization for the Provision of Health Care Services (EOPYY) amounted to EUR 781 513 247 in 2022 compared to EUR 885 980 016.00 in 2020, which corresponds to a reduction of EUR 104 466 769. Taken together, the reduction in the pharmaceuticals clawback for 2022 amounted to EUR 74 711 773.11 compared to the 2020 level (i.e. exceeding the target of EUR 50 000 000 as required by the target (as indicated on page 7)).
- Evidence 3. In particular, the document is signed by the Minister of Health and validates the Report of 20 March 2024 of the Ministry of Health (as indicated on pages 1 and 2).
- Evidence 4. In particular, the certificate dated 29 November 2023 is issued by the General Directorate of Financial Services (Directorate of Finance) and confirms the clawback amounts on the pharmaceutical spending of the National Organization for Health Care Services (EOPYY) for years 2020 and 2022. These amounted to EUR 885 980 016.00 and EUR 781 513 247.00, respectively.
- Evidence 5. In particular, the note dated 19 December 2023 is issued by the General Directorate of Financial Services (Directorate of Budget and Budgetary Reporting) and confirms the clawback amount on the pharmaceutical spending of hospitals for the year 2022 (EUR 389 754 995.89) (as indicated on page 6).

To the extent that this is not achieved, the difference between the targeted reduction and the actual reduction for each year shall not be clawed back from the pharmaceutical industry and the relevant amount shall be borne by the state budget up to EU 50 000 000.

Given the above-mentioned supporting evidence that confirms that the reduction in the 2022 pharmaceutical clawback both for outpatient and inpatient pharmaceuticals exceeded EUR 50 000 000 compared with the 2020 levels as per the first part of the milestone description, no amount needed to be borne by the state budget.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: M203 Recodifying income tax and tax procedure codes

Related Measure: [16643] Codification and simplification of tax legislation

Qualitative Indicator: Entry into force of codified primary and secondary tax legislation for Income Tax Code and Tax Administration Code

Time: Q2 2023

1. Context:

This reform shall simplify and update the legislation for the major tax codes and relevant secondary legal provisions in line with EU best practices. Consistent with the Independent Authority for Public Revenue (IAPR) basic law 4389/2016, the IAPR shall take responsibility for carrying out the updating and modernisation of the Code of Tax Procedure, Governor’s decisions and Revenue administration circulars, including drafting the amendments required for the digitalisation and simplification of the tax administration. The Ministry of Finance and IAPR shall also provide a content management system and dedicated website for taxpayer information thus enhancing transparency, legal certainty, tax compliance and the business environment.

Milestone 203 requires the entry into force of codified Income Tax Code and the entry into force of the Code of Tax Administration (primary and secondary legislation) to simplify and update the legislation in the light of digitalisation and EU best practices.

The Milestone is the third milestone in the implementation of the reform measure and follows the completion of Milestone 199 that provided a detailed time schedule for the tax codification measure and Milestone 202 that developed the required human resources through setting up a tax drafting unit in the Ministry of Finance and a service provision directorate in the IAPR. Milestone 204 is the fourth and last milestone for the measure and requires the codification of a wider set of tax legislation including the VAT code, Stamp duty, Property taxes, State Debt Collection (KEDE), and the National Customs Code, as well as the setting up of a content management system and associated website providing taxpayers with information.

2. Evidence provided:

	<u>Name of the evidence</u>	<u>Short description</u>
1	Summary document, dated 3 June 2024, duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Law 5104/2024 (Official Journal A58 of 19.04.2024) entitled "Code of Tax Administration and other provisions". Entered into force on 19.04.2024 (date of publication)	Primary legislation for Tax Procedures Code. Article 83 references all the secondary legislation Article 83(55) of Law 5104/2024 requires the Minister of Finance to officially notify by Ministerial Decision consolidated tax legislation for the Income Tax Code (and other tax codes), to update these Decisions without

		delay following subsequent legislative changes, and to publish the up-to-date consolidated texts on the Ministry's website
3	Decision of IAPR Governor A 1076 /02.05.2024, (Official Journal B 2670 02.05.2024) entitled "Determination of conditions, procedure and any other specific application issues of the provisions of Article 5 of Law 5104/2024 (A' 58) for the digital notification of documents, decisions and other documents issued by the Tax Administration" and entered into force on 2 May 2024	Governor's decision A 1076/02.05.2024 on procedures for digital notifications of tax administration documents and decisions to taxpayers in Article 5, referenced in Article 83(1)
4	Decision of IAPR Governor number Δ.ΟΠΓ.Γ 1049791 ΕΞ2024/25.04.2024, Official Journal B 2519/26.04.2024, entitled: "Retention period of the documents of the Services of the Independent Authority of Public Revenue (IAPR) and procedure for clearing their inactive file" and entered into force on 26 April 2024	Governor's decision Δ.ΟΠΓ.Γ 1049791 ΕΞ2024/25.04.2 on digitalisation of tax administration documents and archives in Article 6(3), referenced in Article 83(4) of Law 5104/2024
5	Decision IAPR Governor A1069/02.05.2024, Official Journal B 2671 /02.05.2024. entitled "Procedure and supporting documents for the appointment of a tax representative in accordance with Article 8 of Law 5104/2024 "Code of Tax Procedure and other provisions" (A' 58) and entered into force on 2 May 2023	Governor's decision A1069/02.05.2024 laid down conditions for the appointment of a foreign tax representation in Article 8, referenced in Article 83(6) of Law 5104/2024
6	Decision IAPR Governor A1068/29.04.2024, Official Journal B 2534/29.04.2024, entitled "Determination of the means of notification of acts and documents of the Tax Administration in cases where it is not possible to communicate them by digital means, in accordance with the provisions of article 5 of Law 5104/2024 (A' 58), the extent of application of each mode, as well as and any other necessary matter" and entered into force on 29 April 2024	Governor's decision A1068/29.04.2024 covers cases where it was not possible to communicate digitally in Article 5, referenced in Article 83(2) of Law 5104/2024

7	Ministerial Decision 69656 ΕΞ /20.05.2024 (Official Journal B 3049 of 29.05.2024) of the Deputy Minister of National Economy and Finance entitled "Publication of a single codified text of the administrative codification of Income Tax Law". Entry into force on 29 May 2024	Ministerial Decision providing for the notification and publication of the administratively-codified Income Tax Code
8	Act of Deputy Minister of Economy and Finance 68141 ΕΞ /16.05.2024 (Published ΔΙΑΒΑΓΕΙΑ ΑΔΑ Π95ΦΗ-59Γ) entitled "Publication of the Administrative Codification of the Income Tax Code". Published on 16 May 2024	Publication of codified Income Tax Code on the official website of Ministry of Economy and Finance https://minfin.gov.gr/kodikopoiisi-forologikis-nomothesias/
9	Published Administrative note of Ministry of Finance 68138 ΕΞ /16.05.2024 "Transmission of the text of the administrative codification of the Code". Dated 16/05/2024	Ministry of Finance internal, but published note circulating the official administrative codification of the Income Tax Code up to and including amendments in law 5105/2024 of 29.04.2024, provided by Codification Committee on 2 May 2024
10	Law 4738/2020, Official Journal A' 207/27-10-2020, concerning "Debt Settlement and Second Chance and Other Provisions"	Provisions on simplification of the Income Tax Code. Article 298 suspended the Special solidarity contribution for tax year 2020
11	Law 4876/2021, Official Journal A' 251/23-12-2021, with provisions on Income Tax Code regarding transactions with electronic payments	Provisions on digitalisation of the Income Tax Code. Article 50 provided additional incentives for electronic transactions (covered by previous milestone 198)
12	Law 4972/2022, Official Journal A' 181/23-09-2022, with provisions on Income Tax Code and Tax Procedure Code	Provisions on simplification of the Income Tax Code. Article 177 abolished the Special solidarity contribution for all taxpayers for tax year 2023 onwards.
13	Law 5073/2023, Official Journal A' 204/11-12-2023, with provisions on Income Tax Code and Tax Procedure Code	Provisions on simplification and digitalisation of the Income Tax Code
14	Inter-European Organisation of Tax Administrations "Applying New Technologies and Digital Solutions in Tax Compliance" (2019)	Document published by the Inter-European Organisation of Tax Administrations providing descriptions of digital best practices in EU and other European Tax Administrations.
15	IMF/EU Commission "Tax Administration Diagnostic Assessment Tool (TADAT) Report: Performance Assessment Report: Greece, January 2024"	Peer review assessment by external experts of the performance of the Greek Independent Authority for Public Revenue, financed by DG REFORM and IMF.

16	Decision of IAPR governor O.3071/14.12.2023 (ΑΔΑ: 6ΝΨ646ΜΠ3Ζ-ΡΝ5)	Relevant secondary legislation concerning digital provisions of law 5073/2023
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3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone:

Entry into force of (...) codified Code of Tax Administration (primary and secondary legislation) to simplify and update the legislation in the light of digitalisation and EU best practices.

The Code of Tax Administration provides the legal framework for the operation of the Independent Authority on Public Revenue (IAPR). An extensive reform of this Code was legislated as Law 5104/2024 of 19 April 2024 (listed as evidence 2 above). It provides a comprehensive legal framework for all tax administration digital and non-digital interactions with taxpayers in 45 pages plus annexes.

The reform reflected the extensive growth of digitisation since 2013 and took into account consultations with other EU tax authorities through the Inter-European Organisation on Tax Administration (IOTA) and the conclusions of recent reports on recent developments in digitalisation and best EU and international best practices. The Authorities in particular made use of current EU and international best practices in tax administration in the light of digitisation cited in IOTA 2019 document “Applying New Technologies and Digital Solutions in Tax Compliance” (listed as evidence 14 above). The recent IMF/EU’s “Greece: TADAT Performance Assessment Report 2023” (listed as evidence 15 above) provides an assessment of the specific strengths and weaknesses of the Greek tax administration and identified specific issues requiring further attention. In particular, the IOTA book examples highlight the importance of strengthening taxpayer compliance through improved interaction and using digitisation to reduce taxpayer burdens (pp 36-45), whilst the TADAT report assesses how performance could be improved and operational risks reduced inter alia through further digitisation (pp 6-12), as well as identifying the need for Greece to make further improvements in the accountability and transparency of tax administration auditing (pp 35-38).

Following up on major points in these reports, the new legislation included important reforms in the following areas (the references in parenthesis in this paragraph refer to articles of the new Law 5104/2024): (i) legal changes improving the efficiency and operation of the revenue service include provisions for digital notification and exchange of information with taxpayers (Articles 5 and 16) and facilitating the digital exchange of information with third parties (Article 15), both points identified as good practices by the IOTA report; (ii) reforms reducing administrative burdens on taxpayers, including inter alia through pre-filling of tax returns for individuals and small businesses (article 14) and developing risk-based information requirements for certain companies (Article 14(3) and 36) both identified as good practices by the IOTA and the TADAT report; (iii) changes to the requirements for audit orders providing allowing improved accountability and transparency, including ensuring greater integrity and legal certainty in tax audits (Articles 27-33) identified as a specific issue for Greece in the ETADAT report.

Furthermore, the new text has simplified the complexity of the legislation and made it easier to understand by taxpayers. A comprehensive redrafting has improved the organisation and sequencing of the text, as well as providing a single overview of all secondary legislation in a single article (Article 83). As such, the reform represents a major reform of tax administration that is fully in line with the milestone requirement to simplify and update the legislation in the light of digitalisation and EU best practices.

The primary legislation for the Code of Tax Administration was adopted as law 5104/2024 that entered into force on 19 April 2024 (listed as evidence 2 above). The following four relevant items of secondary legislation have been adopted and have already entered into force:

- (a) Decision A 1076/02.05.2024 of the IARP Governor on procedures for digital notifications in Article 5 (listed as evidence 3 above) that entered into force on 2 May 2024. This sets out the detailed rules to ensure for the smooth process of digital exchange of multiple types of information and decisions between tax administration and taxpayers. This will simplify and improve the efficiency of interaction between the tax administration and taxpayers;
- (b) Decision Δ.ΟΠΓ.Γ 1049791ΕΞ2024/25.04.2 of the IARP Governor on digitalisation of archives in Article 6(3), referenced in Article 83(4) (listed as evidence 4 above) that entered into force on 24 April 2024. This sets out the conditions to allow for the replacement of paper archives by digitalised archives. This will improve the accessibility of existing non-digitalised information on taxpayers and should result in more efficient data cross-checking and reduced administrative burdens on taxpayers;
- (c) Decision A1069/02.05.2024 of the IARP Governor laid down conditions for the appointment of a foreign tax representation in Article 8, referenced in Article 83(6) (listed as evidence 5 above) that entered into force on 2 May 2024. This sets out new digital procedures that allow to reduce administrative burdens on companies that are operate in but are not legally based in Greece;
- (d) Decision A1068/29.04.2024 of the IARP Governor covers cases where it was not possible to communicate digitally in Article 5, referenced in Article 83(2) (listed as evidence 6 above) that entered into force on 29 April 2024. This sets out the processes and conditions under which non-digital communication with taxpayers is accepted. It is obviously the essential counterpart of successful digital notification procedures.

Entry into force of codified Income Tax Code (primary and secondary legislation) to simplify and update the legislation in the light of digitalisation and EU best practices.

The Greek Income Tax Code law has been reformed in a series of laws since October 2020 to bring it in line with digitalisation and EU best practices. A major reform was the reduction of the income tax burden and the simplification of the complexity of the income tax through the suspension and eventual total abolition of the special solidarity contribution, thus reducing the number of effective tax bands from eight to four. This was achieved through a series of laws in November 2020 starting with article 298 of law 4738/2020 (listed as evidence 10 above) which suspended the solidarity surcharge for private sector taxpayers for the 2020 tax year and which was renewed for tax years 2021 and 2022 in article 33 of law 4772/2021 and article 121 of law 4799/2021. The complete abolition of the special solidarity surcharge for the tax year 2023 was achieved through article 177 of law 4972/2022 (listed as evidence 12 above) that entered into force on 23 September 2022 in accordance with article 192. Concerning digitalisation and building on the previous provisions adopted as part of milestone 198 that encouraged electronic transactions in Law 4876/2021 of December 2021 (listed as evidence 11 above), law 5073/2023 (listed as evidence 13 above) introduced a substantial widening of sectoral requirements for POS machines and restricted the maximum amounts of cash allowed in real estate transactions. The final substantive changes to the primary legislation of the Income Tax Code were adopted in Law 5073/2023 (listed as evidence 13 above) and entered into force on 5 December 2023 in accordance with article 59 with application for the 2024 tax year. The relevant secondary legislation was IAPR Governor's decision O.3071/14.12.2023 (listed as evidence 16 above) that entered into force on 14 December 2023.

As a national procedure to complete the formal codification, the Authorities had asked the Central Codification Committee, including lawyers and stakeholders, to undertake a comprehensive administrative codification of the Income Tax Code. This administrative code provides a consolidated up-to-date legal text with associated commentary, enabling taxpayers to clarify the primary tax legislation in force at different periods of time, its relationship to fiscal and other legislation, and sources for secondary legislation. This work is considered useful to achieve the overall objectives of the measure that will provide a content management system and dedicated website to enhance transparency, legal certainty, tax compliance and the business environment for taxpayers (part of milestone 204).

The legal basis of the notification and publication of the formal administrative codification of the Income Tax Codification was provided by Article 83(55) of law 5104/2024 (listed as evidence 2 above) that entered into force on 19 April 2024. This provision requires the Minister of Finance by Ministerial Decision to notify the consolidated tax legislation to the tax administration and to immediately publish the up-to-date consolidated texts of the administrative codification of the Income Tax Code on the Ministry's website.

The description of milestone 203 in the Council Implementing Decision is as follows: "Entry into force of codified Income Tax Code (primary and secondary legislation) (...) to simplify and update the legislation in the light of digitalisation and EU best practices." Greece has reformed the Income Tax Code through a series of reforms from November 2020 to December 2023 to simplify and update the legislation in the light of digitalisation and EU best practices. The reform process itself was completed by the adoption and entry into force of the primary legislation of Law 5073/2023 of December 2023. As a result of the particular procedures of Greece, the final stage of codification was then completed in March 2024 through an administrative codification of the Income Tax Code that provides additional legal commentary for taxpayers on the primary law. Since the primary legislation was unchanged by this process, this final stage of the codification was achieved through an additional provision in Article 83(55) of law 5104/2024 to require the Minister of Finance by Ministerial Decision to notify the administratively codified Income Tax Code to the tax administration and to immediately publish the up-to-date Income Tax code on the Ministry's website. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, in that the final administrative codification of the Income Tax Code does not as such enter into force, this does not affect the progress towards the achievement of the reform that the milestone represents, taking into account that the tax legislation was simplified and updated, in line with the requirements of the CID. This substantive reform was completed by entry into force of the primary and secondary legislation of Law 5073/2023 of December 2023. On this basis, it is considered that this constitutive element of the milestone 203 is satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: T228 Training - Judges and Clerks

Related Measure: [16733] Skills and digital skills for judges and judicial employees (judicial staff)

Quantitative Indicator: Number of judges enrolled in the national school of judges

Baseline: 10

Target: 25

Time: Q1 2023

1. Context:

The relevant part of the measure consists of the implementation of changes regarding the function and syllabus of the National School of Judges, including the revision of candidate selection criteria, the admission of additional categories of students (magistrate's court judges and court of audit judges), the offer of additional courses to provide new skills, managerial, digital and judicial and the provision of mandatory lifelong training to judges, in topics essential for the performance of their duties.

The milestone concerns the enrolment of 14 additional magistrate court judges in the national school of judges and of one judge of the court of audit in the national school of judges, bringing the total number of judges participating in training to 25.

Target 228 is the second target of the reform and it follows the completion of target 224, related to the enrolment of 10 magistrate's court judges in the national school of judges. It consists of the enrolment of an additional 14 magistrate's court judges and one judge of the court of audit at the National School of Judges, bringing the total number of judges enrolled to 25 and, as such, specifically relates to the second element of the reform, aiming at adding a new category of eligible judges to the students at the National School of Judges.

Target 228 will be followed by the last milestone in the reform, milestone 235 (due by Q4 2024), regarding the implementation of changes in the syllabus of the National School of Judges, the full operationality of the educational programme for judicial clerks within the National School of judges and the enrolment of 65% of judges and judicial clerks in lifelong training.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document, dated 28 June 2024, duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Document signed by the acting secretary of the coordination service of	Document, dated 18 June 2024, certifying the enrolment in the National School of Judges of 14

	the Ministry of Justice, Protocol No. 35153	magistrate's court judges and one judge from the court of audit
3	Joint Ministerial Decision of the Ministers of Finance, Development and Investment and Justice No. 24195/31.05.2022, Official Journal, section C, No. 1278/31.05.2022	Publication of the notice of launch of a competition for the admission of students at the National School of Judges, including fifteen (15) posts for Magistrate's court judges and three (3) posts for judges from the court of audit
4	List of Appointees of the competition committee for the admission of students at the National School of Judges, Official Journal, section C, No. 3226/29.12.2022	Publication of the competition results for the National School of Judges, containing the list of candidates for the National School of Judges, section of civil and criminal justice and magistrate's court judges, in order of merit
5	List of Appointees of the competition committee for the admission of students at the National School of Judges, Official Journal, section C, No. 3243/30.12.2022	Publication of the competition results for the National School of Judges, containing the list of candidates for the National School of Judges, section of prosecutors and administrative judges, in order of merit
6	Document of the National School of Judges, reference No. KΘ-MIS 5149206	Signed participants' list, dated 1 February 2023, of 15 magistrate's court Judges on the inauguration day of the training. (section magistrate's court judges)
7	Document of the National School of Judges, reference No. KΘ-MIS 5149206	Signed participants' list, dated 1 February 2023, of 21 administrative Judges on the inauguration day of the training.(section administrative judges)
8	Certificate issued by the General Director of the National School of Judges, No. 17/01.02.2023	Certificate attesting to the enrolment in the National School of Judges, as of 1 February 2023, of 15 Magistrate's court judges and 42 Administrative Judges
9	Decision of the Director of Education and Training, section Administrative Justice, of the National School of Judges, No. 168	Decision, dated 22 November 2023, of classification of five students of the 29 th training course (administrative justice section), as candidate rapporteurs of the Court of Auditors

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the target description. This is demonstrated in the sections below.

14 additional magistrate's court judges enrolled in the national school of judges, 1 judge of the court of audit enrolled in the national school of judges. This shall bring the total number of judges participating in training to 25.

By virtue of the evidence 3 above, a competition was launched for the admission of students at the National School of Judges, including magistrate's court judges (15 posts) and court of audit judges (three posts), as set out in paragraphs A and B, on page 5816 of the above-mentioned issue of the Official Journal. The unified list of the results for the 123 participating candidates in the part of the competition for civil-criminal and magistrate's court judges is provided as evidence 4 above. The

unified list of the results for the 54 participating candidates in the part of the competition for administrative and audit court judges is provided as evidence 5 above.

All successful candidates were enrolled in the National School of Judges by the beginning of the 29th training course (academic year 2023), as asserted in the submitted document issued by the Ministry of Justice (listed as evidence 2 above), which confirms the enrolment in the National School of Judges of 14 additional magistrate's court judges and 1 judge of the court of audit enrolled in the national school of judges. This is also stated in the certificate issued by the General Director of the National School of Judges (listed as evidence 8 above). Moreover, the students enrolled in the National School of Judges were duly sworn in on the same date, as evidenced by the respective signed participants' lists of 15 magistrate's judge courts' section students (listed as evidence 6 above) and 21 administrative courts' (including audit courts) students (listed as evidence 7 above). Regarding the audit court judges studying at the National School of Judges, the director of education and training of its Administrative Justice section classified five students of the 29th training course (academic year 2023) as candidate rapporteurs (that is junior judges) of the court of audit (as provided in evidence 9 above).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: M229 Upgrade Record Systems & IT Justice Systems

Related Measure: [16727] Digital Transformation of Justice (E-Justice)

Qualitative Indicator: Project audit reports to confirm adherence to contractual obligations

Time: Q2 2023

1. Context:

The digital transformation of the Greek justice system shall be carried out under the supervision of the Ministry of Justice and shall consist of a set of actions that shall increase its IT capabilities with regard to the digitisation of documents, the enhancement of the record-keeping system of the courts, the simplification, standardisation and acceleration of procedures through digitalisation, and the interoperability of IT systems of the courts with those of the Ministry of Justice, as well as other national and international authorities and/or databases. The civil and criminal branches of the judiciary, as well as the Court of Audits shall be covered by this reform. The implementation of the reform shall be completed by 31 December 2025.

The milestone requires the receipt of official evidence, by means of appropriate documentation (certifications of completion, protocols of qualitative and quantitative acceptance and issued invoices) of the due and punctual performance of all contractual engagements due by that date, in compliance with project calendars, covering all elements of the two subprojects, (court record systems and upgrades to IT Justice systems (OSDDY-PP, Court of Audits, National Criminal Record), by appropriate means, (such as project audit reports, certificates of qualitative/quantitative delivery and evidence of disbursement).

Milestone 229 is the first step of the implementation of the reform and it will be followed by milestone 239, related to the full operability of audio data record-keeping systems in all civil and penal courts and the delivery of all projects, fully implemented and operational, related to (i) phase II of the integrated system for the management of court civil and criminal cases (hereinafter referred to as "OSDDY-PP"), (ii) the Court of Audits and (iii) the National Criminal Record projects. The reform has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document, dated 5 June 2024, duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	

2	Report of the Ministry of Justice, protocol No. 35161	Report, dated 05 June 2024, submitted by the Coordination Service of the Greek Ministry of Justice, detailing the implementation steps, that is the due contractual deliverables, of the milestone
3	Audit report of DFK PD Audit SA Certified Public Accountants, signed by certified auditor Margarita Papathanassopoulou	Audit report, dated 05 June 2024, submitted by DFK PD Audit S.A. to Information Society S.A. (hereinafter “the contracting authority”) and attesting to the satisfactory implementation of the milestone
4	Contract No. 2220, ADAM No. 23SYMV0128307302023-06-07, dated 02 June 2023, between the “Information Society S.A.” (and the contractor “Profile Software S.A.”	Signed contract, dated 02 June 2023, between the “Information Society S.A.” (hereinafter “contracting authority”) and the contractor “Profile Software S.A.” regarding the sub-project 1, “Upgrading the Record-Keeping System of the Courts”, (hereinafter “Contract No. 2220”)
5	Letter of the contractor’s project management office, protocol No. 20722	Letter, dated 02 October 2023, addressed by the project manager of contract No. 2220 to the project acceptance committee of the contracting authority of contract No. 2220, regarding the handover of the deliverables of phase A1 of annex 3 to the contract (hereinafter “A.1”), as detailed in the analysis hereinbelow
6	Protocol of quantitative and qualitative acceptance, protocol no. 23132	Protocol of quantitative and qualitative acceptance, dated 01 November 2023, of the project acceptance committee of the contracting authority of contract No. 2220, regarding all deliverables of A.1., as detailed in the analysis hereinbelow
7	Decision of completion and acceptance, protocol No. 23676, ADA No. 9Ω9O469H4Σ-2ΜΔ	Decision of completion of the contracting authority of contract No. 2220, dated 07 November 2023, regarding the quantitative and qualitative acceptance of the deliverables of A.1., as detailed in the analysis hereinbelow
8	Quarterly report, protocol No. SA 19059	First quarterly report of the project manager of contract No. 2020 dated, 07 September 2023, regarding digital recording, storage and disposal of court proceedings, being the first deliverable of Phase A9 of contract No. 2220 (hereinafter “A.9”)
9	Report of the acceptance committee of the contracting authority protocol No. 20871	Protocol of the acceptance committee of the contracting authority of contract No. 2020, dated 04 October 2023, regarding the qualitative and quantitative acceptance of the first deliverable of A.9., as detailed in the analysis hereinbelow
10	Decision of the contracting authority, protocol No. 23381, ADA No. 6TT469H4Σ-M6L	Decision of the contracting authority, dated 03 November 2023, regarding the completion and acceptance of the first deliverable of A.9 and Contractual Payment, as detailed in the analysis hereinbelow
11	Quarterly report, protocol No. 25795	Second quarterly report of the project manager of contract No. 2020, dated 05 December 2023, regarding digital recording, storage and disposal of court proceedings, being the second deliverable of A.9.

12	Report protocol No. 26254	Protocol of the acceptance committee of the Contracting Authority of contract No. 2020, dated 11 December 2023, regarding the qualitative and quantitative acceptance of the second deliverable of A.9., as detailed in the analysis hereinbelow
13	Decision of the contracting authority, protocol No. 27417, ADA No. ΩΖ5Λ469Η4Σ-ΠΕΡ	Decision of the contracting authority of contract No. 2220, dated 21 December 2023, regarding completion and acceptance of the second deliverable of A.9 and Contractual Payment, as detailed in the analysis hereinbelow
14	Invoice No. ΤΠΥ0000231/17.11.2023, protocol No. 24575	Contractor's invoice, dated 20 November 2023, for the first deliverable (first quarterly report) of A.9 of contract No. 2220
15	Payment authorisation and clearance, protocol No. 24964, ADA No. 917Γ469Η4Σ-ΤΑΛ, ADAM No. 23PAY013842124	Payment authorisation and clearance, dated 24 November 2023, of above invoice, issued by the contracting authority of contract No. 2020.
16	Payment Execution by Bank of Greece, protocol No. 25213	Disbursement evidence, dated 28 November 2023, regarding invoice No. ΤΠΥ0000231/17.11.2023
17	Invoice No. ΤΠΥ0000283, protocol No. 27564/	Contractor's invoice, dated 22 December 2023, for the second deliverable (second quarterly report) of A.9 of contract No. 2220
18	Payment authorisation and clearance, protocol No. 488, ADA No. 9ΖΨ9469Η4Σ-Λ6Υ, ADAM No. 24PAY014119291	Payment authorisation and clearance, dated 10 January 2024, of above invoice, issued by the contracting authority of contract No. 2220
19	Payment execution by Bank of Greece, protocol No. 642/12.01.2024	Disbursement evidence, dated 12 January 2024, regarding invoice No. ΤΠΥ0000283/21.12.2023
20	Contract No. 2089, ADAM No. 22SYMV011874389	Signed contract, dated 20 December 2022, between the contracting authority and the contractor "Association of companies Netcompany, Intrasoft SA, Uni Systems M.A.E., Q & R, Cosmos Computers A.E.B.E." regarding the sub-project 2, "Upgrade and Expansion of the IT System of the Justice Sector", (hereinafter "contract No. 2089")
21	First amendment to the No. 2089, ADAM No. 23SYMV013263090	First amendment, dated 16 August 2023, to contract No. 2089
22	Second amendment to the contract No. 2089, ADAM No. 23SYMV01759096	Second amendment, dated 14 November 2023, to contract No. 2089
23	Third amendment to the contract No. 2089, ADAM No. 24SYMV014230140	Third amendment, dated 07 February 2024, to contract No. 2089
24	Letter of the contractor's project management office, protocol No. 14753	Letter dated 06 July 2023, addressed by the project manager of contract No. 2089 to the project acceptance committee, regarding the handover of the deliverables of Functional Unit 1.1 of phase 1 of annex 3B to the contract

		(hereinafter “FU 1.1”), as detailed in the analysis hereinbelow
25	Protocol of quantitative and qualitative acceptance, protocol no. 15995	Protocol of quantitative and qualitative acceptance, dated 20 July 2023 of the project acceptance committee, regarding the deliverables of FU 1.1 of contract No. 2089, as detailed in the analysis hereinbelow
26	Decision of completion and acceptance, protocol No. 17106, ADA No. 6ΞΩ2469H4Σ-EX3	Decision of the contracting authority completion regarding the quantitative and qualitative acceptance, dated 31 July 2023, of the deliverables of FU 1.1 of contract No. 2089, as detailed in the analysis hereinbelow
27	Invoice No. 296, protocol No. 27305	Invoice, issued by the contractor of contract No. 2089 on 20 December 2023, addressed to the contracting authority regarding the payment for the deliverables of FU 1.1 of contract No. 2089
28	Decision, protocol No. 3437, ADA No. 60ΦA469H4S-HEΞ, ADAM No. 24PAY014267167	Decision of the contracting authority, dated 14 February 2024, on the payment authorisation and clearance of invoice No. 296
29	Payment execution order, protocol No. 3661	Disbursement evidence, dated 15 February 2024 regarding the payment, by the Bank of Greece, of the amount of the invoice No. 296
30	Notification of final submission of the implementation study, protocol No. 17829	Letter, dated 9 August 2023, of the delivery manager of contract No. 2089, on the final submission of the implementation study regarding the deliverables of Functional Unit 3.1 of phase 3 of annex 3B (hereinafter “FU 3.1”), as detailed in the analysis hereinbelow
31	Protocol of quantitative and qualitative acceptance, protocol no. 19055	Protocol of quantitative and qualitative acceptance, dated 07 September 2023, of the project acceptance committee, regarding the deliverables of FU 3.1 of contract No. 2089, as detailed in the analysis hereinbelow
32	Decision of completion and acceptance, protocol No. 20584, ADA No. 15469H4S-20H	Decision of completion of the contracting authority regarding the quantitative and qualitative acceptance, dated 29 September 2023, of the deliverables of FU 3.1 of contract No. 2089, as detailed in the analysis hereinbelow
33	Invoice No. 14923, protocol No. 23724	Invoice, issued by the contractor of contract No. 2089 on 11 March 2024, addressed to the contracting authority regarding the payment for the deliverables of FU 3.1
34	Decision, protocol No. 6868, ADA No. 6ΓT6469H4Σ-MM2, ADAM No. 24PAY014469363	Decision, dated 22 March 2024, of the contracting authority on the payment authorisation and clearance of invoice No. 14923
35	Payment execution order, protocol No. 7260	Disbursement evidence, dated 28 March 2024, regarding the payment, by the Bank of Greece, of the amount of the invoice No. 14923
36	Letter of the contractor’s project management office, protocol No. 4834	Letter dated 09 March 2023, addressed by the project manager of contract No. 2089 to the contracting authority, regarding the handover of the deliverables of Functional Unit 2.1 of phase 2 of annex 3B to the contract (hereinafter “FU 2.1”), as detailed in the analysis hereinbelow
37	Letter of the contractor’s project management office, protocol No. 19093	Letter dated 08 September 2023, addressed by the project manager of contract No. 2089 to the contracting authority, regarding the handover of the finalised

		deliverables of FU 2.1., as detailed in the analysis hereinbelow
38	Protocol of quantitative and qualitative acceptance, protocol no. 20952	Protocol of quantitative and qualitative acceptance, dated 05 October 2023, of the project acceptance committee, regarding the deliverables of FU 2.1 of contract No. 2089, as detailed in the analysis hereinbelow
39	Decision of completion and acceptance, protocol No. 21637, ADA No. PT1J469H4S – GK0	Decision, dated 13 October 2023, of the contracting authority completion regarding the quantitative and qualitative acceptance of the deliverables of FU 2.1 of contract No. 2089, as detailed in the analysis hereinbelow
40	Invoice No. 0046925, protocol No. 23274	Invoice, issued on 02 November 2023 by the contractor of contract No. 2089, addressed to the contracting authority regarding the payment for the deliverables of FU 2.1
41	Decision, protocol No. 6872, ADA No. Ψ32P469H4Σ-ΟΛΓ, ADAM No. 24PAY014469449	Decision, dated 22 March 2024, of the contracting authority on the payment authorisation and clearance of invoice No. 23274
42	Payment execution order, protocol No. 7102	Disbursement evidence, dated 27 March 2024, regarding the payment, by the Bank of Greece, of the amount of the invoice No. 23274

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Receipt of official evidence, by means of appropriate documentation (certifications of completion, protocols of qualitative and quantitative acceptance and issued invoices) of the due and punctual performance of all contractual engagements due by that date, in compliance with project calendars, covering all elements of the two subprojects, (court record systems and upgrades to IT Justice systems (OSDDY-PP, Court of Audits, National Criminal Record), by appropriate means, (such as project audit reports, certificates of qualitative/quantitative delivery and evidence of disbursement).

The Greek authorities provided, alongside the summary note (evidence 1), a report of the coordination service of the Ministry of Justice (evidence 2) on the fulfilment of the milestone's requirements, detailing the submitted pieces of evidence and assessing the manner of fulfilment of all those elements of the two subprojects as were due by the time of submission, on the basis of the relevant certifications of completion, protocols of qualitative and quantitative acceptance, issued invoices and evidence of disbursement, as detailed per sub-project hereinbelow. The report also refers to the findings and conclusions of the external auditors' report (evidence 3), regarding the satisfactory implementation of the milestone. More specifically:

- Regarding the sub-project 1, "Upgrading the Record-Keeping System of the Courts":

The period of reference for the milestone's fulfilment extends from the start date of the contract No. 2220, namely 02 June 2023 (as indicated in evidence 4 above, article 3, page 17), to 21 April 2024, at which point the external auditor commenced the project audit based on the documentation submitted at that time by the contracting authority (as indicated in evidence 1 above, section A, page 7, and evidence 3, page 3).

All contractual engagements are included in the contract No. 2220, more specifically within its annexes 2 (page 152 ff.) and 3 (page 169 ff.). The contractual deliverables that had become due by the end of the above period of reference, according to the subproject's contractual timeline, are the following:

- Two quarterly reports under Phase-A9 "Recording and transcription services", the first one due by the end of the third month and the second one by the end of the sixth month from the beginning of the contract's term (as indicated in evidence 4 above, annex 2, page 168, annex 3, page 169).
 - The certification of completion of the first of the reports above was delivered by the contractor to the contracting authority on 07 September 2023 (evidence 8) and was accepted by the latter's acceptance committee, as evidenced by its protocol of qualitative and quantitative acceptance (evidence 9), followed by the contracting authority's decision of acceptance of the deliverable (evidence 10), the issuance of the relevant invoice by the contractor (evidence 14), the authorisation and clearance of its payment by the contracting authority (evidence 15) and the provision of evidence of disbursement of the invoiced amount by the Bank of Greece (evidence 16).
 - The certification of completion of the second of above reports was delivered by the contractor to the contracting authority on 05 December 2023 (evidence 11) and was accepted by the latter's acceptance committee, as evidenced by its protocol of qualitative and quantitative acceptance (evidence 12), followed by the contracting authority's decision of acceptance of the deliverable (evidence 13), the issuance of the relevant invoice by the contractor (evidence 17), the authorisation and clearance of its payment by the contracting authority (evidence 18) and the provision of evidence of disbursement of the invoiced amount by the Bank of Greece (evidence 19).
- Completion and Delivery of Phase AI "Detailed Project Implementation Plan – Requirements Analysis", within five months from the beginning of the term of contract No. 2220 (evidence 4, page 169). The deliverable consists of (i) an implementation study, (ii) an interoperability study on interconnection, (iii) a security study and (iv) a systems migration study. The certification of completion, that is the final handover of all deliverables was completed on 02 October 2023 (evidence 5), the deliverables were accepted by Acceptance Committee on 01 November 2023, as evidenced by its protocol of qualitative and quantitative acceptance (evidence 6) and the latter issued its decision of Completion and acceptance of the deliverables on 07 November 2023 (evidence 7). No invoice was issued, given that no payment was due for this delivery, as per the relevant clause of contract No. 2020 (evidence 4, article 10 para. B, page 28).

In conclusion, all constitutive elements of the milestone were duly fulfilled with respect to the deliverables of sub-project 1 as detailed hereinabove, as established by the provision of the relevant certifications of completion, protocols of qualitative and quantitative acceptance, issued invoices and evidence of disbursement).

- Regarding the sub-project 2, "Upgrade and Expansion of the IT System of the Justice Sector":

The period of reference for the milestone's fulfilment extends from the start date of contract No. 2089 (evidence 20), namely 10 January 2023 (evidence 20, page 23) to 21 April 2024, at which point the external auditor commenced the project audit based on the documentation submitted at that time by the contracting authority (evidence 1, section A, page 7 and evidence 3, page 3).

All contractual engagements are included in annexes 3B (evidence 22, page 18 ff.) and 4C (evidence 23, page 74 ff.) to contract No. 2089. The contractual deliverables that had become due by the end of the above period of reference, according to the subproject's timeline, are the following:

- The completion and delivery of FU1.1 "Project Implementation Plan - Digital Services'- Applications' Requirements" within six months from the beginning of the term of contract No. 2089, as per evidence 20, page 23, in combination with evidence 22, page 18.

The certification of completion, that is the final handover of above deliverable to the contracting authority was duly completed (evidence 24) and the deliverables were accepted by the latter's acceptance committee, as evidenced by its protocol of qualitative and quantitative acceptance (evidence 25); following acceptance, the contracting authority issued a decision of completion and acceptance of the deliverables (evidence 26) and the contractor issued the corresponding invoice (evidence 27), whose payment was duly authorised and cleared by the contracting authority (evidence 28) and effected by the Bank of Greece, as per the relevant of evidence of disbursement (evidence 29).

- The completion and delivery of Phase FU3.1 "Studies – Requirements Analysis", within seven months from the beginning of the term of contract No. 2089, as per evidence 20, page 23, in combination with evidence 22, p. 22.

The certification of completion, that is the final handover of above deliverable to the contracting authority was duly completed (evidence 30) and the deliverables were accepted by the latter's acceptance committee, as evidenced by its protocol of qualitative and quantitative acceptance (evidence 31); following acceptance, the contracting authority issued a decision of completion and acceptance of the deliverables (evidence 32) and the contractor issued the corresponding invoice (evidence 33), whose payment was duly authorised and cleared by the contracting authority (evidence 34) and effected by the Bank of Greece, as per the relevant of evidence of disbursement (evidence 35).

- The completion and delivery of Phase FU2.1 "Studies – Requirements Analysis", within eight months from the beginning of the term of contract No. 2089, as per evidence 20, page 23, in combination with evidence 22, p. 20.

The certification of completion, that is final handover of above deliverable to the contracting authority was duly completed (evidence 37) and the deliverables were accepted by the latter's acceptance committee, as evidenced by its protocol of qualitative and quantitative acceptance (evidence 38); following acceptance, the contracting authority issued a decision of completion and acceptance of the deliverables (evidence 39) and the contractor issued the corresponding invoice (evidence 40), whose payment was duly authorised and cleared by the contracting authority (evidence 41) and effected by the Bank of Greece, as per the relevant of evidence of disbursement (evidence 42).

In conclusion, all constitutive elements of the milestone were duly fulfilled with respect to the deliverables of sub-project 2 as detailed hereinabove, as established by the provision of the relevant certifications of completion, protocols of qualitative and quantitative acceptance, issued invoices and evidence of disbursement).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: M230 Entry into force - Judicial Performance Tool

Related Measure: [16575] Accelerating the administration of justice

Qualitative Indicator: Entry into force of secondary legislation

Time: Q2 2023

1. Context:

This reform shall accelerate the administration of justice and contribute to the economic and institutional transformation of the country. The introduction of a temporary scheme for the provision of financial incentives to judicial clerks is among other actions that shall enhance the efficiency and effectiveness of Justice. This action is based on objectively measurable individual performance indices and in full consistency with the unified wage grid (Law 4354/2015), without setting any exemption, for the acceleration of the performance of courthouse-related tasks and duties and the elimination of court backlogs.

The milestone at hand consists of the entry into force of primary and secondary legislation to set up a temporary bonus system to be based on the development of a Judicial Clerks Performance Tool setting strategic goals and introducing objective KPIs (such as time for completing a duty, individual performance in terms of time, communication and motivation) by department and/or category of clerks and providing accurate and objective data on the allocation of bonuses; bonuses to be payable in the first quarter after the end of the relevant year, on the basis of that year's performance.

The Milestone is the second and last step in the implementation of the part of the measure regarding the temporary bonus system. It follows the completion of Milestone 223, related to the award of a contract for the provision of technical support to the Greek authorities in the process of drafting the relevant primary and secondary legislation.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	A Summary document, dated 22 August 2024, duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	Law No. 4940/2022, published in the Official Journal, Section A, No. 112/14.06.2022, styled "System of target setting, evaluation and rewarding to enhance effectiveness of the public administration, arrangements for human resources in the public sector and other provisions"	Primary legislation on the establishment of a reward system for judicial clerks (article 26) and on authorizing the adoption of the necessary secondary legislation (article 62(11)), date of entry into force of its relevant provisions (article 26 and article 62(11)) 14 June 2022
3	Joint Ministerial Decision of the Ministers of National Economy and	Secondary legislation for the establishment of the temporary system of rewards for judicial

	Finance and of Justice, No. 56921, published in the Official Journal, Section B, No. 7462/29 .12. 2023, styled “Temporary System of Rewards for judicial clerks”	clerks, date of entry into force 29 December 2023
4	Certificate signed by the General Director of the Ministry of Justice, protocol number 55258	Document, dated 21.08.2024, regarding the number of organic positions of the judicial clerical posts in Greece and the number of above positions effectively staffed in 2022
5	Excerpts of the Final Options Note of the World Bank, dated June 2023, for Reforming the Performance and Compensation Framework for Judicial Clerks	Relevant extracts of the report regarding options for moving forward with a performance-based incentive scheme providing a financial incentive and further motivation to judicial clerks aiming to reduce the backlog of current cases
6	Excerpts of the Final Survey Report on Options of the World Bank, dated August 2022, for reforming the performance and compensation framework	Relevant extracts of the report regarding the main challenges affecting the performance and motivation of clerks working in the Greek judicial system

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Entry into force of primary and secondary legislation to set up a temporary bonus system.

The Greek authorities submitted a summary note (evidence 1), describing the temporary bonus system, (‘Judicial Clerks Performance Tool mechanism’) and referring to the relevant provisions, which cover all required elements. Moreover, the authorities submitted copies of the publication in the Official Journal of both the law (evidence 2) and the joint ministerial decision (evidence 3) and identified the relevant provisions indicating the entry into force.

The primary legislation to set up the temporary bonus system (evidence 2) contains provisions of the law relevant to the temporary bonus system, as follows: (i) article 26, providing for its establishment (paragraph 1) and for its temporary character, extending from 1 January 23 to 31 December 2025 (paragraph 2); (ii) article 62(11), containing the enabling provision for the issuance of the necessary secondary legislation in the form of a joint ministerial decision of the Ministers of Finance and of Justice and (iii) article 65(1) stipulating that above-mentioned provisions shall enter into force upon publication in the Official Journal, that is on 14 June 2022.

The secondary legislation, (evidence 3) contains provisions for the establishment and operation of the temporary system of rewards for judicial clerks, particularly in its articles 1, 2, 3, 4, 6, 7, 8 and 9(2) as detailed hereinbelow. It entered into force on the date of publication, pursuant to the penultimate sentence of its article 10.

The temporary system will be based on the development of a Judicial Clerks’ Performance Tool setting strategic goals and introducing objective KPIs (such as time for completing a duty, individual performance in terms of time, communication and motivation) by department and/or category of clerks and provide accurate and objective data on the allocation of bonuses.

All above-described elements of the temporary bonus system have been duly put in place by the relevant provisions of the secondary legislation. More specifically:

- (i) The strategic goals of the system are set in article 1 of evidence 3, which lists:

- The strengthening of the efficiency of judicial staff,
 - The decrease of the time necessary for the completion of court-related work and tasks,
 - The elimination of delays and the fostering of a sense of rewarding high efficiency among judicial clerks.
- (ii) The objective key performance indicators (KPIs), on the basis of which the annual lists of beneficiaries will be drawn by the administrative heads of courts and services, are identified in article 9 of evidence 3. More specifically, in terms of the time taken for the performance of duties, article 9(2) sets criteria based on the type and volume of duties carried out by each judicial clerk within each court or judicial service during the relevant period, such as the number of cases processed after delivery of a draft decision by the judge, the number of certificates issued, the number of summons issued and decisions notified, the issuing of statistical tables to monitor the workflow of cases in courts and public prosecutors' offices, the uploading of judgments in integrated information technology systems and the amount of overtime work. The provision further stipulates, with regard to the efficiency of judicial clerks entrusted with the performance of administrative duties, that it will be assessed in particular on the basis of the quantitative efficiency and speed of the courts or services under their purview. Moreover, in terms of the assessment of individual performance on the basis of time, communication and motivation, article 9(3) sets forth, as criteria for the identification of the bonus beneficiaries, their interest in the rapid and efficient execution of tasks assigned, their ability to perform multiple tasks related to the nature of their post and their adaptability to new technologies, procedures and communication skills.
- (iii) The requirement of the provision of accurate and objective data on the allocation of bonuses is met by a combination of several provisions of evidence 3, namely article 2, stipulating the total amount of the bonus (EUR 11,000,000) and its duration (from 1 January 2022 to 31 December 2025), article 3, identifying the perimeter of potential beneficiaries, article 4, grouping the beneficiaries in distinct categories based on their respective monthly remuneration, articles 6 and 7, defining the amount of the bonus payable to the eligible members of each category and article 8, setting a ceiling to the amount payable to each potential beneficiary.

Bonuses to be payable in the first quarter after the end of the relevant year, on the basis of that year's performance.

Article 4 of evidence 3 stipulates that the bonuses will be paid in the first quarter of the year following the reference year, with the exception of the rewards relating to the year 2022, which were to be paid within one month of its publication, which was effected on 29 December 2023, well beyond the first quarter following the relevant reference year.

Furthermore, in line with the description of the measure:

The introduction of a temporary scheme for the provision of financial incentives to judicial clerks should be based on objectively measurable individual performance indices and in full consistency with the unified wage grid (Law 4354/2015) without setting any exemption, for the acceleration of the performance of courthouse-related tasks and duties and the elimination of court backlogs.

The temporary bonus system set up by the primary and secondary legislation adopted by the Greek authorities is consistent with the unified wage grid, without setting any exemption to it, according to the relevant provisions. More specifically:

With regard to the primary legislation, article 26(2) of evidence 2 stipulates that the remuneration shall be calculated on the basis of the basic salary and the allowance for a position of responsibility. Both of these sources of income are respectively defined by articles 14 and 16 of Law 4354/2015 (published in the Official Journal, section A, No. 176/16.12.2015). With regard to the secondary legislation, article 8 of evidence 3 correlates the amount of the bonus payable to beneficiaries with above-mentioned sources of income, by providing that the total amount of the bonus may not exceed 15% of the sum of the annual basic salary and the position of responsibility allowance.

The remaining elements of the requirement, regarding the introduction of objectively measurable individual performance indices, have been covered hereinabove, under the milestone description requirements.

Minimal Deviation

The Council Implementing Decision required the distribution of bonuses based on the individual performance of judicial clerks in terms of time, communication and motivation. In the relevant article 6 of evidence 3, the Greek authorities stipulated that, for the first year (2022), half of the total amount of the bonus would be distributed among all potential beneficiaries, whereas the remaining half for 2022, as well as the total amount for each of the following years (pursuant to article 7 of evidence 3), would be distributed to the most productive 25% of potential beneficiaries, that is on an individual performance basis. Whilst this partially horizontal distribution for the year 2022 constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, it was justified, in the wording of article 6 of evidence 3, by taking into account the understaffing of the judicial services of Greece, due to the filling of only around 65 % of the statutory posts, that is 5678 out of 8735, according to evidence 4, and the consequent need for permanent overperformance and overtime work of serving judicial clerks, in order to address the accumulated volume of their various duties. In this respect, it is noteworthy that due to the severe understaffing conditions, resulting in a judge/clerk ratio of 1:0.91, which is significantly lower than the EU average of 1:3.9, 69 percent of the judicial clerks surveyed by the World Bank reported working over 40 hours per week, spending, on average, 6.52 extra hours at work (evidence 6, section 2.1, page 7). Moreover, in their correspondence of 29 September 2023 (listed under the key discussions with the member state section hereinabove), the Greek authorities indicated that the partially horizontal distribution of the 2022 bonus amount would facilitate a smooth transition to the bonus system for court officials and thereby increase their interest in participating in the digital transition of justice (including the electronic filing and service of documents, the electronic submission of applications and receipt of certificates, the electronic tracking of cases, the digitisation of court records), as well as in the modernisation and resulting acceleration of judicial proceedings, further contributing to the achievement of the milestones of the RRP concerning the digital transformation of justice and the revision of the judicial map. In this respect, it should be noted that, in establishing a partly fixed and partly variable payment of the bonus only for the first of year of the three-year period, the Greek authorities opted for the stricter of the two options outlined by the World Bank in evidence 5 (section II, table 1, third column, page 6), whereas the alternative option allowed for a mixed fixed-variable payment over the three-year period. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the reform that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: M231 Contracts for judicial buildings

Related Measure: [16292] New Judicial Buildings

Qualitative Indicator: Award of Contracts

Time: Q2 2023

1. Context:

The measure consists of a targeted investment for the construction and renovation of buildings that are part of the judicial system, closely linked with the revision of the judicial map, to maximize judicial efficiency and avoid unnecessary effort and expenses. The newly constructed buildings shall all comply with a Primary Energy Demand (PED) that is at least 20% lower than the NZEB requirement (nearly zero-energy building, national directives). It is expected that this measure does not do significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852, taking into account the description of the measure and the mitigating steps set out in the recovery and resilience plan in accordance with the Do No Significant Harm Technical Guidance (2021/C58/01). In particular, the measure requires the economic operators carrying out the construction works to ensure that at least 70% (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC of 3 May 2000 replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste (notified under document number C(2000) 1147)) generated on the construction site shall be prepared for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol.

Milestone 231 requires the award of contracts for construction projects that were not affected by the revision of the administrative judicial map and those that are not expected to be affected by the revisions of the civil and penal judicial map. Moreover, it requires the terms of award(s) to set out that the new buildings to be constructed shall achieve a Primary Energy Demand (PED) that is at least 20% lower than the nearly zero energy building requirement, as per the relevant (, national directives).

This investment measure needs to comply with specific do not significant harm requirements as concerns the re-use, recycling and other material recovery of the non-hazardous construction and demolition waste, in line with EU legislation and the EU Construction and Demolition Waste Management Protocol.

Milestone 231 is the third milestone of the investment, and it follows the completion of milestone 222, on the drawing of an initial list of construction projects identifying eligible buildings not affected by the revision of the judicial maps, and milestone 227, on the adjustment of the list following the revision of the administrative judicial map and the launch of tenders regarding administrative courts. It will be followed by milestone 233, on the further adjustment of the list following the revision of the civil and penal judicial map and the launch of tenders regarding civil and penal courthouses, and milestone 237, on the completion of all remaining new buildings and renovations in line with the needs of the revised judicial map and the completion and full operationalisation of the judicial buildings e-identity platform. The investment has a final expected date for implementation on 31 December 2025

2. Evidence provided:

1	Summary document, dated 5 June 2024, duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled.	
2	Statement by the Ministry of Justice, Protocol No. 3291	Statement, dated 4 June 2024, certifying that the construction projects included in the milestone are not affected by the revision of the judicial map
3	Request for Proposals, ADAM No. 23PROC012473551 2023-04-10	Request for Proposals, published on 10 April 2023, for upgrading the building structure of the Athens administrative courts
4	Special Conditions of Contract regarding the project "Upgrading of the building complex of the Administrative Courts of Athens"	Document appended to the above Request for Proposals and setting forth the specific tender specifications for the project
5	Decision of contract award, ADAM No. 23AWRD012981152 2023-06-29	Contract award decision, issued on 15 June 2023, of the contracting authority, "Ktiriakes Ypodomes S.A." awarding the contract for the project "Upgrading of the building complex of the Administrative Courts of Athens" to the contractor "ROMVOS S.A."
6	Request for Proposals, ADAM No. 23PROC012601688 2023-05-04	Request for Proposals, published on 4 May 2023, for the restoration and maintenance of the building facilities of the Council of the State
7	Special Conditions of Contract regarding the project	Document appended to the above Request for Proposals and setting forth the specific tender specifications for the project
8	Decision of contract award, ADAM No. 23AWRD013641881 2023-10-24	Contract award decision, issued on 7 September October 2023, of the contracting authority, "Ktiriakes Ypodomes S.A.", awarding the contract for the project "Restoration and maintenance of the building facilities of the Council of the State in Arsakeio Megaro" to the contractor "P. Development S.A."
9	Call for Tenders under protocol No. 13842, ADA No. 6ΦΚ446ΨXYI-ΞΙΣ	Call for tenders, dated 21 July 2022, regarding the project "Improving the infrastructure of the Greek Justice system relocation of Piraeus Court Services – Purchase of property"
10	Decision of Contract Award, with protocol number 3528, ADA No. ΨΧΩ646ΨXYI-ΞΘ1	Contract award decision, issued on 7 March 2023, of the contracting authority, "Fund for the Financing of Judicial Buildings (TA.X.DI.K.)", awarding the contract for the project "Improving the infrastructure of the Greek Justice system relocation of Piraeus Court Services – Purchase of property" to

		the contractor “HUB 204 single shareholder S.A.”
11	Request for Proposals, ADAM No. 23ROC013970000 2023-12-14	Request for Proposals, dated 14 December 2023, for the project, “Energy upgrade of the court of auditors' central office building”
12	Special Conditions of Contract regarding the project “Energy upgrade of the court of auditors' central office building”	Document appended to the above Request for Proposals and setting forth the specific tender specifications for the project
13	Decision of contract award, ADAM No. 24AWRD014352515 2024-03-01	Contract award decision, issued on 1 February 2024, of the contracting authority, “Ktiriakes Ypodomes S.A., awarding the contract for the project “Energy upgrade of the court of auditors' central office building” to the contractor “Triton Act S.A.”
14	Entry of the contract award decision, ADAM No. 23AWRD012981152 2023-06-29, in the central electronic registry of public contracts platform	Publication, on 19 June 2023, of the contract award notice under (5) hereinabove on the platform
15	Entry of the contract award decision, ADAM No. 23AWRD013641881 2023-10-24, in the central electronic registry of public contracts platform	Publication, on 11 September 2023, of the contract award notice under (8) hereinabove on the platform
16	Entry of the contract award decision, ADAM No. 24AWRD01452515 2024-03-11, in the central electronic registry of public contracts platform	Publication, on 8 July 2024, of the contract award notice under (13) hereinabove on the platform
17	Entry of contract award decision , with protocol number 3528, ADA No. ΨΧΩ646ΨΧΥΙ-ΣΘ1, in the DIAVGEIA platform	Publication, dated 7 March 2023, of the award decision under (10) hereinabove to the

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Award of contracts for construction projects not affected by the revision of the judicial map.

The Greek authorities submitted a Statement by the Ministry of Justice (listed as evidence 2 above) identifying the eligible judicial buildings for construction or renovation work, that is the buildings not affected by the revision of the judicial map for administrative justice (Law 5028/2023, published in the Official Journal, section A, No. 54) and by the revision of the judicial map for civil and criminal Justice (Law 5108/2024, published in the Official Journal, section A, No. 65). Consequently, the judicial buildings eligible for construction or renovation works are the following: the Piraeus Judicial Building (new construction, which will house the administrative as well as the civil and criminal courts of Piraeus), the Court of Audit Judicial Building (renovation works), the Council of State Judicial Building (renovation works) and the Athens Administrative Courts Judicial Building (renovation works).

Moreover, the Greek authorities submitted four copies of decisions of award notification corresponding to the four judicial buildings covered by the milestone. More specifically:

- Decision of Contract Award (evidence 10) regarding the project “Improving the infrastructure of the Greek Justice system relocation of Piraeus Court Services – Purchase of property”, duly notified to the contractor (evidence 17).
- Decision of contract award (evidence 5), regarding the project “Upgrading of the building complex of the Administrative Courts of Athens”, published in the central electronic registry of public contracts platform (evidence 14).
- Decision of contract award (evidence 8) regarding the project “Restoration and maintenance of the building facilities of the Council of the State in Arsakeio Megaro”, published in the central electronic registry of public contracts platform (evidence 15).
- Decision of contract award (evidence 13), regarding the project “Energy upgrade of the court of auditors' central office building”, published in the central electronic registry of public contracts platform (evidence 16).

Terms of award(s) shall set out that the new buildings to be constructed shall achieve a Primary Energy Demand (PED) that is at least 20% lower than the NZEB requirement (nearly zero-energy building, national directives).

The only project of the above-listed ones involving the construction of a new building is the one related to the Piraeus judicial building. In this respect, the relevant request for proposals (evidence 9), as submitted by the Greek authorities, provides, in its article II(4), section (iv), under the heading “Energy Performance”, (page 9) that:

“The building must have an energy consumption of at least 20 % below the thresholds set for the construction of nearly zero-energy buildings (NZEB), in accordance with national legislation (Article 9 of Law 4122/2013 transposing Directive 2010/31/EU of the European Parliament and of the Council). To this end, the building is equipped with thermal insulation, materials and energy efficiency technologies, as well as RES systems that reduce primary energy consumption and support green growth through energy efficient measures.”

Regarding the three remaining projects, evidence 1 includes references to the relevant parts of the technical specifications containing the selection criteria that ensure compliance with DNSH, as follows.

Moreover, the Greek authorities provided copies of the relevant specific tender specifications documents, as appended to the respective requests for proposals for the Court of Audit Judicial Building, the Council of State Judicial Building and the Athens Administrative Courts Judicial Building. More specifically:

- Regarding the Court of Audit building, article 2(1) of the relevant request for proposals (evidence 12), lists among the contractual documents that form an integral part thereof the specific tender specifications. The relevant provision of the latter ensuring compliance with DNSH, is article 4(1) sub-paragraph 8, on page 6.
- Regarding the Council of State building, article 2(1) of the relevant request for proposals (evidence 7) lists among the contractual documents that form an integral part thereof the specific tender specifications. The relevant provision of the latter ensuring compliance with DNSH, is article 4(1) sub-paragraph 11, on page 9.
- Regarding the Athens administrative courts building, article 2(1) of the relevant request for proposals (evidence 4), lists among the contractual documents that form an integral part thereof the specific tender specifications. The relevant provision of the latter ensuring compliance with DNSH, is article 4(1) sub-paragraph 6, on page 6.

The wording of all three above provisions is identical and has as follows:

“As regards the recycling of waste, the following measure is envisaged: Economic operators carrying out the construction works must ensure that at least 70 % (by weight) of the non-hazardous construction and demolition waste, excluding the physical materials listed in Category 17 05 04 of the European List of Waste established by Decision 2000/532/EC of 3 May 2000 replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste (notified under document number C (2000) 1147), produced on the construction site, is prepared for re-use, recycling and other material recovery processes, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Construction Protocol.”

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: M257 Contract award for road safety - first batch of contracts

Related Measure: [16631] Road Safety Upgrade

Qualitative Indicator: Notification of award of contracts for at least 2 300 locations.

Time: Q2 2023

1. Context:

The investment comprises improvements in the safety of road networks across the country through interventions in more than 7 000 dangerous locations across 2 500 km of the network. The implementation of the investment shall be completed by 31 December 2025. This investment measure needs to comply with specific do not significant harm requirements and in particular is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU.

The milestone consists of the award of contracts for at least 2 300 locations ensuring a) improvement of the road safety as part of the program “Road Safety Improvement Program (PEVOA)” on approximately 7 000 dangerous locations; b) minor improvements for the rest of 2 500 km.

Milestone 257 is the first step of the implementation of the investment, and it will be followed by milestones 258 and 259, related to the award of contracts for interventions at 100% of locations and to completion of the investment respectively. The investment has a final expected date for implementation in Q4 2025.

2. Evidence provided:

The list provided should be reviewed to ensure that the evidence listed includes the relevant identifiers (numbers, dates) for references to laws, official journals, decisions, acts adopted, strategies, action plans, etc. It is not sufficient to indicate that the law was adopted and/or published in the Official Journal.

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled	
2	Invitation for the submission of funding applications in the programme “Improving Road Safety” issued by the Ministry of Interior on 1 July 2022 (Ref. 43972/01-07-2022; ADA: : Ψ5Π346MTΛ6-4BE)	Copy of the Call inviting the regions and municipalities with a permanent population of more than or equal to 20.000 inhabitants, and the tourist municipalities to submit proposals concerning the existing road network under the responsibility of first and second level local authorities aiming to improve road safety and reduce accidents

3	Five (5) Inclusion Decisions issued by the Ministries of Interior and Finance	Copies of one (1) Regions Inclusion Decision and four (4) Municipalities Inclusion Decisions for the selected projects by regions and municipalities following the Call 43972/01-07-2022 (evidence 2 above)
4	Contracts' list	
5	Twenty-four (24) decisions of contract award	Copies of decisions of contract award issued by regions and municipalities for the approval of the minutes of the evaluation committees and selection of the preferred bidder to carry out the interventions procured
6	Twenty-four (24) contract award notifications	Copies of entries of the contract award decisions above (5) in the central electronic registry of public contracts platform
7	Twenty-four (24) Requests for Proposals	Copies of Requests for Proposals issued by regions and municipalities to procure the interventions required. The Requests for Proposals include description of the interventions and eligibility criteria including DNSH requirements
8	Twenty (20) Technical Reports	Copies of Technical Reports which in some cases were provided by regions and municipalities as additional documents in the tendering process, to further elaborate on technical requirements
9	Map with locations	A copy of a map listing the intervention points at dangerous locations for project no. 87 by the municipality of Argous-Mikion, in addition to the Request for Proposal and Technical Report
10	Pre-table with technical details	A copy of a table listing technical details for the type of works for project no. 230 by the municipality of Pileas-Chortiati, in addition to the Request for Proposal and Technical Report
11	Circular No. ΥΠΕΝ/ΔΙΠΑ/26465/1738 of 17 March 2022(Ref.: ADA: ΨΙΥ94653Π8-ΔΧΤ) of the Ministry of the Environment and Energy on "Clarifications on the environmental authorization of urban regeneration projects"	A copy of the circular which clarifies what type of urban regeneration interventions do not require environmental permit in accordance with the applicable national legislation
12	Standard Environmental Commitment (SEC) (ref.: Presidential Decree/ΔΠΧΣ/199558/3185) of 21 June 2024 issued by the Region of Western Greece	A copy of a Standard Environmental Commitment (SEC) for the Municipality of Pinios's road safety project
13	Twenty-one (21) waivers from the obligation of environmental permits	Copies of letters from the responsible authorities confirming that the road safety interventions under respective projects are exempted from the environmental licensing
14	Law no. 4014 of 21 September 2011 (Government Gazette, Series I, No 209) on "Environmental licensing of projects	A copy of the national law regarding the categorization of projects and activities that require environmental permits

	and activities, regulation of planning violations in conjunction with the establishment of an environmental balance and other provisions within the remit of the Ministry of the Environment”.	
15	Ministerial Decision No. 1958 of 13 January 2012 issued by the Minister for the Environment, Energy, and Climate Change (Official Journal 21/B/2012) on “Classification of public and private projects and activities into categories and subcategories in accordance with Article 1(4) of Law 4014/2011”	A copy of the Ministerial Decision specifying the works related to each category listed in Law no. 4014 of 21 September 2011 and the licensing required

3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Contracts awarded for at least 2 300 locations ensuring a) improvement of the road safety as part of the program “Road Safety Improvement Program (PEVOA)” on approximately 7 000 dangerous locations; b) minor improvements for the rest of 2 500 km.

The twenty-four (24) decisions of contract award issued by regions and municipalities (listed as evidence 5 above), dated between 28 March 2023 and 27 November 2023, and the corresponding twenty-four (24) proofs of entry of the respective contract award decisions in the central electronic registry of public contracts platform ESIDIS proving that the award decisions had been notified to the bidders (evidence 6) concern 2411 dangerous locations across the country (thus exceeding the milestone’s requirement of at least 2300 locations) and cover approximately 430 km of roads.

The list of locations, as well as the type of intervention proving alignment with the CID requirements are provided either in the twenty-four (24) Requests for Proposals (evidence 7), dated between 28 December 2022 and 7 June 2023, or in the twenty (20) Technical Reports (evidence 8), which, in some procedures, formed part of the documentation in the tendering process, to further elaborate on technical requirements listed in the Requests for Proposals. In addition, in one case the locations are listed on a map (evidence 9), and in another case, a table listing the extent of the intervention in km is annexed to the Technical Report (evidence 10). The evidence was checked to confirm that the requirements of the milestone had been satisfactory fulfilled.

The projects by regions and municipalities awarding the contracts had been selected through a Call for Proposals issued by the Ministry of Interior (evidence 2) whose objective was to select road safety interventions on Greece’s national and provincial networks to improve road safety and reduce accidents, in line with the Road Safety Improvement Programme (PEVOA) as mentioned in the milestone description. The Call lists eligible interventions to improve road safety. The projects by regions and municipalities selected for funding through the abovementioned Call (evidence 2), are listed in the five (5) Inclusions Decisions by the Ministries of Interior and Finance (evidence 3), dated from 12 December 2022 to 22 March 2023. The selected municipalities and regions have then proceeded to launch the calls for proposals to commission interventions to improve the road safety, for which subsequently the abovementioned twenty-four (24) decisions of contract award (evidence 5) were issued.

The authorities also submitted a data sheet (evidence 4) which lists all the contracts, referencing each piece of evidence, and provides the number of locations, as well as extent of interventions in km.

The measure is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU, to ensure compliance with the Do No Significant Harm principle is integrated into the project and strictly complied with at the stages of construction, operation and decommissioning of the infrastructure.

The Call for Proposals issued by the Ministry of Interior (evidence 2) states that the eligible actions and interventions shall be in line with do not do significant harm (DNSH) requirements as per the measure description (p. 5). Specifically, the call states that “the measure is subject to an environmental impact assessment in accordance with Directive 2011/92/EU”.

Directive 2011/92/EU applies to “the assessment of the environmental effects of those public and private projects which are likely to have significant effects on the environment” (Article 1 of Directive 2011/92/EU). Article 4 of the Directive states that for certain projects, including urban development projects and roads, it is up to individual EU Member States to decide if there will be an EIA on a case-by-case basis or by setting specific criteria (such as the location, size or type of project). In line with the provisions of the Directive 2011/92/EU, the law no. 4014 of 2011 (evidence 14) , as specialized by the Ministerial Decision no. 1958 of 2012 (evidence 15), specifies that all projects and activities that require environmental permits are divided into two categories:

- Category A where an Environmental Impact Assessment (EIA) is necessary further divided into subcategories A1 and A2:
 - o Category A1 includes projects and activities that are likely to have very significant environmental impacts. EIA is approved by the Ministry of Environment and Energy.
 - o Category A2 includes projects and activities that are likely to have significant environmental impacts. EIA is approved by the Region.
- Category B includes projects and activities that are characterized by local and insignificant environmental impacts and an EIA is not necessary. These projects have to comply with predetermined environmental terms.

In most cases, activities and works included in the road safety programme have minimum environmental impact, and therefore no environmental permits are required in accordance with the applicable national legislation above, and as further explained in Circular ΥΠΕΝ/ΔΙΠΑ/26465/1738 of 17 March 2022 by the Ministry of the Environment and Energy (evidence 11).

Specifically, out of 24 projects in total, twenty-one (21) projects had obtained waivers from the obligation of environmental permits (evidence 13), in line with the national legislation described above. For one project (regarding the Municipality of Pinios’s road safety project which concerns 62 dangerous locations over 25.08 km of the road network) the responsible Region of Western Greece had issued a Standard Environmental Commitment (SEC) (evidence 12) in line with the national legislation. Two contracts (for the Municipality of Alexandroupolis covering 22 dangerous locations, and for the municipality of Kalamarias covering 25 dangerous locations) concern a procurement of equipment for road safety and thus environmental licensing is not applicable. The DNSH requirement is thus satisfactory fulfilled.

4. Commission Preliminary Assessment: satisfactory fulfilled

Number and name of the Milestone: M260 Notification of award of contracts for three sub-projects of BOAK

Related Measure: [16630] Cretan Northern Highway (B.O.A.K.)

Qualitative Indicator: Notification of award of contracts

Time: Q2 2023

1. Context:

The investment concerns the construction of the Cretan Northern Highway (BOAK) which connects the four major cities of Crete (Chania, Rethymnon, Heraklion and Agios Nikolaos) and is part of the Trans-European Transport Network (TEN-T). The investment consists of three sub-projects. Sub-project 1 comprises the segment from Chania to Heraklion, is a tolled motorway of approximately 163 km length that shall be built and operated under a Concession Agreement. This measure shall finance a number of specific predefined works such as the bypasses of Chania, Heraklion and Rethymnon, bridges, interchanges and underground works. Sub-project 2, comprises the segment from Hersonissos-Neapoli of approximately 22.5 km length that shall be built under a Public Private Partnership agreement and sub-project 3 comprises the segment Neapolis – Agios Nikolaos of approximately 14 km length that shall be built as a Public Works project. The motorway aims at improving accessibility between major cities of Crete and all major ports and airports of the island, reducing travel times, increasing level of service and road safety and enhancing regional transport activities, both for passenger and freight traffic.

This investment measure needs to comply with specific do not significant harm requirements and in particular is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU T.

The milestone consists of the notification of the contracts awarded for a) the Concession Agreement; b) the Public-Private Partnership; and c) Public Works project.

Milestone 260 is the first step of the implementation of the investment and it will be followed by target 261 and milestone 262, related respectively to the progress of construction works (60% of the value of the RRF-funded construction works to be completed), and completion of 100% of the value of the RRF-funded works. The investment has a final expected date for implementation of 31 December 2025.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document duly justifying how the milestone (including all the	

	constitutive elements) was satisfactorily fulfilled	
2	Ministerial Decision No. 85535 of 21 March 2024 (Ref: 61ΠΙ465XΘΞ-NH6) of the Minister of Infrastructure and Transport on the “Approval of Report III Examination of Files C (Financial Offer) of the Companies in Phase II of the International Tender – Submission of Binding Tenders – for the award of the concession contract for the project “Design, Construction, Financing, Operation, Maintenance and Exploitation of the Northern Road Axis of Crete (BOAK) on the Chania-Heraklion section”, the appointment of a temporary contractor and a second in the classification of Tenderers”	Copy of the Ministerial Decision dated 21 March 2024 for the approval of the Minutes of the meeting of the Evaluation Committee and selection of the preferred bidder for the construction of sub-project 1: Chania – Heraklion section of the motorway
3	Entry of the contract award decision above under (2) in the central electronic registry of public contracts platform.	Concerns sub-project 1: Chania – Heraklion. Publication of the contract award decision under (2) above on the platform
4	Request for Submission of Binding Offers for the Project "Study, Construction, Financing, Operation, Maintenance and Exploitation of the Northern Road Axis of Crete (B.O.A.K.) in the section of Chania - Heraklion" of 1 December 2022, issued by the Ministry of Infrastructure and Transport	Concerns sub-project 1: Chania – Heraklion
5	Ministerial Decision No. 68871/45536 of 20 July 2022 on “Approval of the environmental terms of the project: ‘Crete North Road Axis (BOAK): Chania – Heraklion Department in the Prefectures of Chania, Rethymno and Heraklion in the Region of Crete (Ref.: ΑΔΑ: 6ΨΝ34653Π8-ΔΡΧ)	Copy of the Ministerial Decision of the Minister of Environment and Energy of approval of Environmental terms for the sub-project 1: Chania – Heraklion
6	Ministerial Decision No. 27000/1783 of 26 April 2023 on “Amendment to Decision No. 68871/4636 of 20.7.2022 approving environmental conditions for the project: ‘Crete North Road Axis (BOAS): section Chania – Heraklion’, as regards the integration of the existing subsections of the Chania – Rethymnos – Heraklion bypass of the BOAK”	Amendment of Ministerial Decision of approval of Environmental terms for the sub-project 1: Chania – Heraklion
7	Ministerial Decision No. 162834 of 25 May 2022 of the Minister of Infrastructure and Transport for the	Copy of the Ministerial Decision dated 25 May 2022 for the approval of the Minutes of the meeting of the Evaluation Committee and

	approval of the Minutes of the Evaluation Committee (of 17 May 2022 and 18 May 2022) and selection of the preferred bidder (ΑΔΑ: 9Ο79465ΧΘΞ-ΠΥ7)	selection of the preferred bidder for the construction of sub-project 2: Hersonissos-Neapoli
8	Entry of the contract award decision above under (7) in the central electronic registry of public contracts platform	Concerns sub-project 2: Hersonissos-Neapoli. Publication of the contract award decision under (7) above on the platform
9	Request for the submission of binding offers (Stage B.II of the tender procedure), published on 30 November 2021 by the Ministry of Infrastructure and Transport	Concerns sub-project 2: Hersonissos-Neapoli. Stage B.II is the final stage of the Public-Private Partnership tender procedure
10	Ministerial Decision No. 10219/692 of 23 November 2021 on 'Approval of the environmental terms of the project: 'Crete North Road Axis (BOAK): subsection of the Hersonissos-Neapoli in the prefectures of Heraklion and Lasithi in the Region of Crete' of the Minister of Environment and Energy (Ref. ΑΔΑ ΡΠ6Δ4653Π8-4ΨΘ)	Copy of the Ministerial Decision of the Minister of Environment and Energy of approval of Environmental terms for the sub-project 2: Hersonissos-Neapoli
11	Ministerial Decision No. 125001 of 20 April 2022 of the Minister of Infrastructure and Transport on the approval of Minutes of the Evaluation Committee and the award of the contract for the conversion to motorway of the Northern Road Axis of Crete. Neapoli – Agios Nikolaos in the Regional Unit of Lasithi (Ref. ΑΔΑ: 6ΔΑΛ465ΧΘΞ -7Ν0)	Copy of the Ministerial Decision dated 20 April 2022 for the approval of the Minutes of the meeting of the Evaluation Committee and selection of the preferred bidder for the construction of sub-project 3: Neapoli-Agios Nikolaos
12	Entry of the contract award decision above under (11) in the central electronic registry of public contracts platform	Concerns sub-project 3: Neapoli-Agios Nikolaos. Publication of the contract award decision under (11) above on the platform
13	Call for Tenders for the Conversion into a motorway of the Northern Cretan Road Axis Section: Neapolis-Agios Nikolaos in the Regional Unit of Lasithi, published on 7 January 2022 (Ref. ΑΔΑΜ: 22PROC009898555)	Concerns sub-project 3: Neapoli-Agios Nikolaos
14	Ministerial Decision No. 195929 of 7 February 2012, issued by the Minister of Environment and Energy on 'Approval of the environmental conditions of the project: Upgrading the BOAK to the Neapoli – Agios Nikolaos section in the prefecture of Lasithi' (Ref. ΑΔΑ: ΒΟΖΙ0-Σ89)	Concerns sub-project 3: Neapoli-Agios Nikolaos Approval of the the Environmental terms of the project

15	Decision No. 102286/6568 of 21 April 2022 on 'Application of Article 1 (para 2) of Law 4685/2020 (Government Gazette, Series I, No 92) on the current DAEC 195929/7.2.2012 of the project: Upgrading the BOAS in the Neapoli – Agios Nikolaos, Lasithi prefecture'	Concerns sub-project 3: Neapoli-Agios Nikolaos. Decision for the extension of the 15-year period of the validity of the Ministerial Decision No. 195929 of 07 February 2012
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3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Notification of award of contracts for a) the Concession Agreement:

The Concession Agreement contract for sub-project 1 "*Design - Construction - Financing - Operation - Maintenance and Exploitation of the North Road Axis of Crete (B.O.A.K.) in the section Chania – Heraklion*", implemented under Law 4413/2016 (OJ A' 148) as amended and in force has been awarded. The authorities submitted as evidence the Ministerial Decision No. 85535 of 21 March 2024 (Evidence no. 2) for the selection of the preferred bidder and the proof that the decision was notified to all participants (Evidence no. 3), which prove that the contract had been awarded and the bidders notified of the contract's award, as per milestone's requirement.

The authorities also submitted the Request for Binding Offers (Evidence no. 4), which proves that the scope of the sub-project is in accordance with the measure description (Article 7, page 26) and evidences that this section of the motorway will be tolled, as per the requirement in the measure description (Article 10.1, page 33, and Article 12, page 36). The evidence was checked to confirm that the CID requirements had been met for this sub-project.

Notification of award of contracts for b) the Public-Private Partnership:

The Public-Private Partnership (PPP) contract for sub-project 2 "*Design, Construction, Financing, Operation and Maintenance of the section Hersonissos - Neapolis, with PPP*", implemented under Law 3389/2005 (OJ A' 232) as amended and in force, has been awarded. The authorities submitted as evidence the Ministerial Decision No. 162834 of 25 May 2022 (evidence no. 7) for the selection of the preferred bidder and the proof that the decision was notified to all participants (evidence no. 8), which prove that the contract had been awarded and the bidders notified of the contract's award, as per milestone's requirement.

The authorities also submitted the Request for binding offers (evidence no. 9), which proves that the scope of the sub-project is in accordance with the measure description (Article 9, page 17). The evidence was checked to confirm that the CID requirements had been met for this sub-project.

Notification of award of contracts for c) Public Work:

The contract for sub-project 3: "*Conversion into a motorway of the North Road Axis of Crete section: Neapoli - Agios Nikolaos in the Regional Unit of Lasithi*" is implemented under the Law 4412/2016 (OJ A' 147/08-08-2016) has been awarded following the Call for Tenders published on 07 January 2022. The authorities submitted as evidence the Ministerial Decision No. 125001 of 20 April 2022 (evidence no. 11) for the selection of the preferred bidder and the proof that the decision was notified to all participants (evidence no. 12), which prove that the contract had been awarded and the bidders notified of the contract's award, as per milestone's requirement.

The authorities also submitted a copy of the Call for Tenders from 7 January 2022 (evidence no. 13), which proves that the scope of the sub-project is in accordance with the measure description (Article 11, page 24). The evidence was checked to confirm that the CID requirements had been met for this sub-project.

The measure is subject to an Environmental Impact Assessment (EIA) pursuant to Directive 2011/92/EU, to ensure compliance with the Do No Significant Harm principle is integrated into the project and strictly complied with at the stages of construction, operation and decommissioning of the infrastructure.”

For the Concession Agreement contract (sub-project 1): the environmental licensing procedure was completed in July 2022. The Environmental Impact Assessment pursuant to Directive 2011/92/EU was approved with the issuance of Ministerial Decision No. 68871/45536 of 20 July 2022 (evidence no. 5), amended on 26 April 2023 (evidence no. 6). The EIA approval decision is integrated into the project, as evidenced by Article 7.1 (page 27) of the Request for Submission of Binding Offers (evidence no. 4). In particular, the bidders had to substantiate in their offers that all project studies will comply with the EIA approval decision. This was part of the selection procedure (Article 23A.2 (page 59) and Article 26 (page 75) of the Request for Submission of Binding Offers). The evidence was checked to confirm that the DNSH requirements had been met for this sub-project.

For the Public-Private Partnership (PPP) contract (sub-project 2): The environmental licensing procedure was completed in November 2021. The Environmental Impact Assessment pursuant to Directive 2011/92/EU was approved with the issuance of Ministerial Decision No. 10219/692 of 23 November 2021 (evidence no. 10). The EIA approval decision is integrated into the project and is part of the basic project design. The bidders had to substantiate in their offers that all project studies will comply with the EIA approval decision. This was also part of the selection procedure (see Articles 2 (page 5), 21 (page 35), and 23 (page 41) of the Request for submission of binding offers (evidence no. 9). The evidence was checked to confirm that the DNSH requirements had been met for this sub-project.

For the public work contract (sub-project 3): The Environmental Impact Assessment pursuant to Directive 2011/92/EU was approved with the issuance of Ministerial Decision No. 195929 of 7 February 2012 (evidence no. 14). This Decision has been extended until 7 February 2026 through Decision No. 102286/6568 of 21 April 2022 (evidence no. 15). The EIA approval decision is integrated into the project and is part of the basic project design. The bidders had to substantiate in their offers that all project studies will comply with the EIA approval decision. This was also part of the selection procedure (see Articles 2 (page 5) and 4.2 (page 14) of the Call for Tenders). The evidence was checked to confirm that the DNSH requirements had been met for this sub-project.

4. Commission Preliminary Assessment: Satisfactory fulfilled

Number and name of the Milestone: M267 Notification of award for European Union Aviation Safety Agency (EASA) works in regional airports

Related Measure: [16833] Implementation of EASA compliance rectification works

Qualitative Indicator: Notification of award of contracts

Time: Q2 2023

1. Context:

This investment comprises upgrade works in 13 regional airports addressing deviations and/or non-compliance under the European Aviation Safety Agency (EASA) Certification Specifications. The certification requirements include certification specifications applicable to the design and type of operation(s) in each airport, any measure whose equivalent level of safety has been accepted by the Hellenic Civil Aviation Authority (HCAA) and any special conditions deemed necessary to be included in the certification basis due to geophysical, morphological or other characteristics of the location of each airport. For any deviation(s) from the certification specifications noticed in any of the 13 targeted airports, the HCAA approved as an attachment to each airport's certificate, a Deviation Acceptance and Action Document (DAAD) indicating the deviation, the certification specification from which an airport was found to deviate, the action required and the time horizon to achieve compliance. The expected outcome of the successful implementation of this measure will be the withdrawal of these DAADs from the respective airports' certificates.

This investment measure needs to comply with specific do no significant harm requirements as concerns the re-use, recycling and other material recovery of the non-hazardous construction and demolition waste, in line with EU legislation and the EU Construction and Demolition Waste Management Protocol.

The milestone concerns the signature of all contracts for the rectification works needed for the 13 regional airports to comply with the Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing EASA.

Milestone 267 is the first step of the implementation of the investment, and it will be followed by milestone 269, related to the completion of all EASA compliance rectification works in the 13 targeted airports. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone requirements (including all the constitutive elements, as set out in the description of the milestone and of the	

	corresponding measure in the CID Annex) have been satisfactorily fulfilled	
2	“EASA COMPLIANCE WORKS DESIGN CONSTRUCTION CONTRACT” signed on 6 May 2022, between “Fraport Regional Airports of Greece A S.A.” and “INTRAKAT S.A. Technical and Energy Projects”, for the upgrade of six regional airports (Corfu, Kavala, Kefalonia, Zakynthos, Aktion and Chania)	Copy of the contract including: the Terms and Conditions of the Contract; the Appendix 1 (Scope of Works); the Appendix 2 (Design Requirements); the Appendix 3 (RRF Procedural Manual for Management and Controlling), which is included in the contract in CD-ROM form and is also accessible through https://greece20.gov.gr/systema-diaxeirisis-kai-elegxou/ ; the Appendix 11 (Health, Safety & Environmental and Operational Requirements and Penalties)
3	Decision of the Airport Infrastructure Directorate No. 132462 of 4 May 2022 (ΑΔΑ: 9ΨΨΠ465ΧΘΞ-ΧΛΤ), for the approval of the draft contract between “Fraport Regional Airports of Greece A S.A.” and “INTRAKAT S.A. Technical and Energy Projects”	Decision of the Directorate for Airport Infrastructures, of the Directorate General for Transport Infrastructures, of the Ministry for Infrastructure and Transport, approving the draft contract between the Concessionaire “Fraport Regional Airports of Greece A S.A.” and the contractor “INTRAKAT S.A. Technical and Energy Projects”, for the design and implementation of works upgrading six regional airports (Corfu, Kavala, Kefalonia, Zakynthos, Aktion, Chania) and for obtaining these airports’ certification by being classified as EASA certified airports
4	“EASA COMPLIANCE WORKS DESIGN CONSTRUCTION CONTRACT” signed on 6 May 2022, between “Fraport Regional Airports of Greece B S.A.” and “INTRAKAT S.A. Technical and Energy Projects”, for the upgrade of seven regional airports (Rhodes, Santorini, Mykonos, Kos, Skiathos, Mytilini and Samos)	Copy of the contract including: the Terms and Conditions of the Contract; the Appendix 1 (Scope of Works); the Appendix 2 (Design Requirements); the Appendix 3 (RRF Procedural Manual for Management and Controlling), which is included in the contract in CD-ROM form and is also accessible through https://greece20.gov.gr/systema-diaxeirisis-kai-elegxou/ ; the Appendix 11 (Health, Safety & Environmental and Operational Requirements and Penalties)
5	Decision of the Airport Infrastructure Directorate No. 132446 of 4 May 2022 (ΑΔΑ: ΩΝΤΨ465ΧΘΞ-ΜΝΙ) for the approval of the draft contract between “Fraport Regional Airports of Greece B S.A.” and “INTRAKAT S.A. Technical and Energy Projects”	Decision of the Directorate for Airport Infrastructures, of the Directorate General for Transport Infrastructures, of the Ministry for Infrastructure and Transport, approving the draft contract between the Concessionaire “Fraport Regional Airports of Greece B S.A.” and the contractor “INTRAKAT S.A. Technical and Energy Projects”, for the design and implementation of works upgrading seven regional airports (Rhodes,

		Santorini, Mykonos, Kos, Skiathos, Mytilini and Samos) and for obtaining these airports' certification by being classified as EASA certified airports
6	Ministerial Decision of the Minister of Infrastructure and Transport No. 373330, published in the Official Journal 6457/B on 31 December 2021, and applying from that date as stipulated in article 5.6 thereof	Ministerial Decision for the 'Delegation of responsibilities to the Directorate for Airport Infrastructures of the Ministry of Infrastructures and Transport, for the management of matters relating to the implementation of Concession Agreements for the upgrading, maintenance, management and operations of the regional airports of Crete, Continental Greece and Ionian (Group A) and of the Aegean (Group B), detailing the 'Projects to lift incompatibilities with the EASA Regulations' in each of the 13 regional airport concerned and the studies/works needed to make these airports compliant with EASA requirements
7	Approvals of Environmental Terms (AoET) for each of the 13 targeted regional airports	<p>Decision 133953/8672 of 16 December 2022 (ADA: ΨΓΥ24653Π8-487) on the Environmental Conditions for the airport of Aktion</p> <p>Decision 72735/4749 of 5 July 2023 (ADA: ΨΨΥΞ4653Π8-7ΞΞ) on the Environmental Conditions for the airport of Chania</p> <p>Decisions 123235/8107 of 23 November 2022 (ADA: ΨΚΨΨ4653Π8-B45) and 1731/104 of 9 January 2023 (ADA: Ψ79B4653Π8-ΧΦ1) on the Environmental Conditions for the airport of Corfu</p> <p>Decision 55723/3711 of 19 May 2023 (ADA: 9ΩΓΤ4653Π8-ΘΕΕ) on the Environmental Conditions for the airport of Kavala</p> <p>Decision 57139/3842 of 24 May 2023 (ADA: 6ΑΤ24653Π8-ΔΧ7) on the Environmental Conditions for the airport of Kefalonia</p> <p>Decision 81952/5566 of 5 August 2022 (ADA: 9ΚΖΝ4653Π8-Λ1Υ) on the Environmental Conditions for the airport of Kos</p> <p>Decision 38064/2593 of 6 April 2023 (ADA: 6ΡΓΦ4653Π8- Δ8Ε) on the Environmental Conditions for the airport of Mykonos</p> <p>Decision 77785/5110 of 19 July 2023 (ADA: ΩΝΑΣ4653Π8-1ΜΦ) on the Environmental Conditions for the airport of Mytilini</p>

	<p>Decision 116015/7663 of 7 November 2022 (ADA: ΩΣΔN4653Π8-4ΦΚ) on the Environmental Conditions for the airport of Rhodes</p> <p>Decision 74752/5077 of 18 July 2022 (ADA: ΩΤ8Π4653Π8-ΜΥΔ) on the Environmental Conditions for the airport of Samos</p> <p>Decision 12710/861 of 3 February 2023 (ADA: 9Α5Ω4653Π8-NE5) on the Environmental Conditions for the airport of Santorini</p> <p>Decisions 116025/7666 of 7 November 2022 (ADA: 6ΘΧ54653Π8-ΑΦΗ) and 4001/234 of 19 January 2023 (ADA: ΨΔΔ44653Π8-ΨΙΣ) on the Environmental Conditions for the airport of Skiathos</p> <p>Decision 77331/5227 of 25 July 2022 (ADA: ΨΔ4Τ4653Π8-Μ24) on the Environmental Conditions for the airport of Zakynthos</p>
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3. Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

European Union Aviation Safety Agency (EASA) compliance Program: All contracts for rectification works of 13 regional airports to comply with the new Regulation (EU) 2018/1139 signed.

On 6 May 2022, the Concessionaire “Fraport Regional Airports of Greece A S.A.” and the contractor “INTRAKAT S.A. Technical and Energy Projects”, signed the “EASA COMPLIANCE WORKS DESIGN CONSTRUCTION CONTRACT” (evidence 2) for the upgrade of six regional airports (Corfu, Kavala, Kefalonia, Zakynthos, Aktion and Chania) to address deviations and/or non-compliance under the new European Union Aviation Safety Agency (EASA) Certification Specifications, which constitute a contractual obligation of the State. The contract had been approved by the Directorate for Airport Infrastructures, of the Directorate General for Transport Infrastructures, of the Ministry for Infrastructure and Transport according to the Decision No. 132462 (evidence 3) issued on 4 May 2022.

On 6 May 2022, the Concessionaire “Fraport Regional Airports of Greece B S.A.” and the contractor “INTRAKAT S.A. Technical and Energy Projects”, signed the “EASA COMPLIANCE WORKS DESIGN CONSTRUCTION CONTRACT” (evidence 4) for the upgrade of seven regional airports (Rhodes, Santorini, Mykonos, Kos, Skiathos, Mytilini and Samos) to address deviations and/or non-compliance under the new European Union Aviation Safety Agency (EASA) Certification Specifications, which constitute a contractual obligation of the State. The contract had been already approved by the Directorate for Airport Infrastructures, of the Directorate General for Transport Infrastructures, of the Ministry for Infrastructure and Transport with the Decision No. 132446 (evidence 5) issued on 4 May 2022.

The Article 14 of the Appendix 1 (Scope of Works) of both contracts (evidence 2 and 4), outlines the works to be carried out to address the EASA non-compliances. The exact scope of these works will derive from the detailed design to be elaborated by the contractor, as per the Appendix 2 (Design Requirements) of the contracts (evidence 2 and 4), and in accordance with the respective provisions

of the Ministerial Decision 373330, Official Journal 6457/B/31.12.2021 (evidence 6) specified in the pages 82176 to 82325 thereof, detailing the 'Projects to lift incompatibilities with the EASA Regulations' in each of the 13 targeted regional airport and the studies/works needed to make these airports compliant with EASA requirements.

For any deviation(s) the Hellenic Civil Aviation Authority (HCAA) has approved, as an attachment to each airport's certificate, a Deviation Acceptance and Action Document (DAAD) indicating the deviation, the certification specification from which an airport was found to deviate, the action required and the time horizon to achieve compliance. Article 18 in page 5 of the Appendix 1 (Scope of Works) of the contracts (evidence 2 and 4), stipulates that the detailed design, under the Contractor's responsibility, will comply with the Technical Requirements so that the EASA 'Deviation Acceptance and Action Documents – DAADs' will be withdrawn, and no additional non-compliances will be created.

The measure requires the economic operators carrying out the construction works to ensure that at least 70% (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC of 3 May 2000 replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste (notified under document number C(2000) 1147)) generated on the construction site shall be prepared for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol.

Page 1 of the Appendix 3 (RRF Procedural Manual for Management and Controlling) of both contracts (evidence 2 and 4) provides the complete set of procedures that should be applied and followed under the RRF and include, inter alia, in the Manual 'Δ0' file's section 2. 'Legal Basis', A. 'Basic Community legislative framework', 4th bullet point, the 'Do No Significant Harm' Technical Guidance (2021/C58/01). The Article 20 'Environmental Responsibility' in page 5 of the Appendix 11 (Health, Safety & Environmental and Operational Requirements and Penalties) of both contracts (evidence 2 and 4) stipulate that the contractor must comply with the environmental permits issued for the respective works, and will be responsible for complying with the Laws, environmental terms, regulations, ordinances on the subject of environmental protection and waste management and disposal in force. On top of these provisions and given the specificities and exact scope of works in each airport, the Ministry for Environment and Energy issued ad hoc Decisions (evidence 7) establishing additional environmental conditions corresponding to each different airport's rectification work plans.

4. Commission Preliminary Assessment: Satisfactorily fulfilled