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Supporting Evidence for the European Commission's Stress Test of the Birds and Habitats Directives: Lessons from the implementation of the Nature Directives in Greece

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Drawing on The Green Tank's work on biodiversity policy, this document presents evidence from Greece that is relevant to the implementation of the Birds and Habitats Directives (henceforward the Nature Directives) and to the Commission's assessment.

Greece provides a particularly relevant case study because it is of the EU's Member States with the richest biodiversity, one of the largest Natura 2000 networks relative to its territory and has undergone significant reforms in biodiversity governance during the last decade, while having been considered a laggard in implementation for many years.

The Greek experience demonstrates both the effectiveness of the Nature Directives and the significant progress made in their implementation over time. Where implementation gaps and challenges have persisted, these have primarily related to governance, institutional framework and capacity, ecological knowledge, monitoring, financing, and public participation dimensions, rather than to the legal framework itself.

The most direct benefits of the Nature Directives are for nature itself. The Nature Directives have provided stable, legally binding protection for species and habitats that would otherwise have lacked an equivalent level of protection. They have also driven the establishment and progressive development of Greece's protected-area network, largely based on the Natura 2000 network, which today covers a substantial proportion of Greece's terrestrial territory (27.3%) and marine environment (approximately 18% of territorial waters).

Improvements in the conservation status of emblematic species such as the loggerhead sea turtle (*Caretta caretta*) and the Mediterranean monk seal (*Monachus monachus*), including their downlisting on the IUCN Red List, also illustrate how the framework established by the Nature Directives—through legally binding protection, the designation of protected areas, systematic monitoring and targeted conservation measures—has contributed to tangible conservation successes.

Key messages from the Greek experience

The evidence and examples presented in this document support the following key messages relevant to the Commission's Stress Test:

- The **Nature Directives form the foundation of modern nature conservation policy in Greece**, building on what was previously a partial and fragmented framework. The Nature Directives have been effective not only in establishing the legal basis for the Natura 2000 network and the protection of species and habitats, but also in progressively driving the development of the wider system needed to implement nature conservation: dedicated governance structures and institutional framework and capacity, scientific knowledge and data, and monitoring, conservation planning, objectives and measures,

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environmental impact and appropriate assessments and permitting, participatory processes and more systematic public investment in biodiversity[1],[2],[3]. The Greek experience demonstrates that implementation capacity develops and matures over time within a stable legal framework[4]. Although implementation has often been delayed, incomplete or inconsistent in important areas, Greece has made substantial progress over more than three decades in translating the Nature Directives' requirements into administrative practice and on-the-ground conservation. Remaining gaps therefore point to the need to complete and strengthen implementation, rather than to weaken or simplify the underlying legal framework.

- **Where implementation remains delayed, incomplete or inconsistent, the principal challenges concern governance, the institutional framework and capacity, ecological knowledge and data, monitoring, enforcement, coordination, public participation and financing, rather than the substantive requirements of the Nature Directives at the national level**. Progress made in Greece, including following EU infringement processes and European and national Court rulings, demonstrates that these challenges can be addressed through stronger implementation within the existing legal framework.

- **Effective implementation and administrative efficiency are mutually reinforcing.** Clear conservation objectives, stable and adequately resourced institutions, predictable financing, consistent and transparent implementation procedures and early integration of biodiversity into strategic and spatial planning can increase legal certainty, reduce uncertainty and conflicts, and avoid unnecessary administrative burden without lowering environmental standards.

- **Biodiversity monitoring and reporting required under the Directives have strengthened the scientific basis for conservation planning and decision-making.**

Efforts to improve efficiency should focus on stronger and more consistent national implementation, enhanced institutional framework and capacity, better coordination and data sharing and reuse, predictable financing, and effective monitoring and enforcement, while maintaining the stable legal framework that has enabled this progress.

The sections that follow provide evidence from the Greek experience illustrating these developments, the progress achieved and the implementation gaps that remain.

Effectiveness

The Nature Directives have become a central component of biodiversity policy in Greece and have over time shaped the country's legal, institutional and scientific framework for nature conservation. Their influence is reflected across several aspects including:

[1] Christopoulou, I. (2023). Greece. In G. Tucker (Ed.), *Nature conservation in Europe: Approaches and lessons* (pp. 353–373). Cambridge University Press.
[2] Syrou, D., Botetzagias, I., & Christopoulou, I. (2026). Understanding the (in)governability of environmental protected areas: The case of Greece. *Land, 15*(1), 100.
[3] European Commission. (2016). *Fitness check of the EU nature legislation (Birds and Habitats Directives)* (Commission Staff Working Document SWD(2016) 472 final)
[4] European Commission. (2025). *2025 Environmental Implementation Review: Country report – Greece* (SWD(2025) 311 final), pp. 16–17 https://environment.ec.europa.eu/law-and-governance/environmental-implementation-review_en

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- the establishment and expansion of the Natura 2000 network, as a cornerstone of Greece's protected areas system
- the gradual adoption of conservation objectives
- the implementation of conservation measures
- biodiversity monitoring
- conservation planning, management and protected-area governance and
- the integration of biodiversity considerations into environmental assessment, through the application of the Appropriate Assessment based on Article 6(3) of the Habitats Directive, and permitting.

This development has taken place gradually over more than three decades. Successive reforms of Greece's biodiversity and protected-area framework have sought to transpose the Nature Directives and their requirements into national law and administrative practice. In doing so, Greece has complied not only with the Directives *per se*, but also with obligations arising from its own Constitution (Article 24), the EU Treaties, the EU 2030 Biodiversity Strategy, the Convention on Biological Diversity, the Barcelona Convention, and other international and regional biodiversity-related agreements. In 2023, Greece further strengthened this framework by adopting, through Law 5037/2023, national 2030 targets for nature protection and restoration aligned with both the Kunming–Montreal Global Biodiversity Framework and the EU 2030 Biodiversity Strategy. Achieving these targets depends, to a large extent, on the effective implementation of the Nature Directives, including the completion of the Natura 2000 management framework, the restoration of degraded ecosystems, with priority given to Natura 2000 sites, and the maintenance or achievement of the favourable conservation status of protected species and habitats, progress towards which is assessed through the monitoring and reporting obligations established under the Nature Directives.

The comparison with the situation documented during the 2014-2016 Fitness Check[5] is particularly instructive with respect to Greece. At that time, important elements of implementation were delayed, incomplete or inconsistent: the Natura 2000 network included only a limited number of coastal and marine sites, site-specific conservation objectives and measures were largely absent, protected-area management covered only part of the Natura 2000 network, systematic monitoring remained underdeveloped and Greece had yet to establish a comprehensive system of species action plans. Significant progress has since been made in several of these areas, although implementation gaps remain. Today, the Natura 2000 network covers more than 18% of Greece's territorial waters, with prospect of further expansion based on data collected for the Habitats and Birds Directive monitoring and the implementation of several LIFE projects, the first national and site-specific conservation objectives have been adopted, while management plans are underway, an integrated system of protected areas governance, covering all Natura 2000 sites, has been established, while several species and one habitat type action plans have been adopted and being implemented (see more details below). This comparison provides concrete evidence of implementation capacity developing over time under the

[5] We draw on the submissions that had been provided by the Greek Ministry of Environment and Energy (at the time Ministry of Environment, Environment and Climate Change / Ministry of the Reconstruction of the Production, Environment and Energy) and of NGOs: ANIMA, Arcturos, Archelon, Callisto, Elliniki Etairia – Society for the Environment and Culture, Hellenic Ornithological Society, Hellenic Society for the Protection of Nature, MEDASSET, Mediterranean SOS Network, MOm, Society for the Protection of Prespa, WWF Greece.

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stable legal framework provided by the Nature Directives and in line with the national governance characteristics.

The adoption of Law 3937/2011 on biodiversity conservation represented an important step in consolidating the national framework for biodiversity protection and triggered several reforms whose implementation took a number of years to materialize, given the ongoing financial crisis in Greece that ensued its adoption. Among the main provisions of the law is the integration of Natura 2000 sites in the national protected areas system, and the legal designation of Sites of Community Importance (SCIs) into Special Areas of Conservation (SACs), the framework for the identification of conservation objectives – as the next important step in the legal recognition of Natura 2000 sites, as well as horizontal measures, including for priority habitats, such as *Posidonia oceanica*. The provisions included in Law 3937/2011 built on lessons learned from the first years of implementation of the Nature Directives and integrated several components to facilitate their implementation (see more examples below).

Subsequent legislative changes, including Law 4519/2018 and culminating in Law 4685/2020, reorganized the governance of protected areas in Greece. The new framework established a nationwide governance and management system covering the entire Natura 2000 network, while providing for permanent staff and funding from the national budget. The latest reform in 2020 created a unified governance structure under the Natural Environment and Climate Change Agency (NECCA) and its Management Units, responsible for all Natura 2000 sites. Since then, the adoption of necessary regulatory provisions and completion of administrative procedures have enabled NECCA to recruit permanent staff, to secure public funding, to upgrade its monitoring and patrolling capacities and to strengthen its enforcement powers. This progress was recognized in the European Commission's 2025 Environmental Implementation Review for Greece[6] as addressing many of the gaps and challenges previously identified.

Species conservation planning provides another concrete example of this progress. Since 2017, through the LIFE-IP 4 NATURA and other LIFE projects, 15 national Action Plans were developed and adopted for several animal species, one plant species and one habitat type, helping to translate the obligations of the Nature Directives into systematic conservation planning. This represents an important development compared with the earlier situation, when species conservation frequently depended only on activities foreseen in individual LIFE projects, scientific initiatives and the work of specialized environmental non-governmental organizations. Hence, while the country was lacking the necessary provisions for species protection for many decades, Greece has now developed the relevant instruments and is already implementing appropriate activities with the support of the competent authorities, relevant stakeholders and EU and national funding.

Work on addressing illegal baits, a major threat to some of Greece's most threatened species, including birds of prey and large carnivores (for most of which Action Plans have been developed), is such an example. NECCA has now integrated trained dogs in its operations, applying an approach first tested through LIFE projects by specialized

[6] European Commission. (2025). *2025 Environmental Implementation Review: Country report – Greece* (SWD(2025) 311 final), pp. 16–17 https://environment.ec.europa.eu/law-and-governance/environmental-implementation-review_en

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environmental organizations (e.g. the Hellenic Ornithological Society and WWF Greece) that was then integrated in species actions plans. Together with awareness-raising campaigns, cooperation among authorities and support in enforcement there is greater alertness and response by enforcement authorities, even if the threat has yet to be fully eliminated.

The Action Plans are further complemented by operational and response protocols and coordinated preventive responses that are gradually being developed, adopted and implemented at the national and local levels by the competent authorities and relevant stakeholders. In recent years, for example, a national platform on large carnivores[7] is supporting dialogue and coordination among authorities and relevant stakeholders in order to enable human-wildlife co-existence in Greece's rural areas as large carnivores recover healthy populations.

In addition, the implementation of compensatory and other support measures, for damage of fishing gear from Mediterranean seals (*Monachus monachus*) introduced in response to the obligations arising from the Habitats Directive and supported by EU funding such as the European Maritime, Fisheries and Aquaculture Fund (EMFAF), have a similar effect. Supported also by awareness-raising campaigns and capacity building activities, gradually it is recognized that other threats, particularly overfishing have a larger impact on local fishing activity than these protected species, limiting the instances of intentional killings. This change is significant given the promising recovery of one of the world's most endangered species.

Over the years Greece has witnessed a notable shift in local attitudes towards nature conservation measures. While early efforts to build support were primarily led by environmental organizations working with local communities across Natura 2000 sites, protected areas, and areas important for the conservation of threatened species to explain the need for and potential benefits of conservation measures, local ownership has gradually increased. A notable example is Amorgorama[8], a grassroots initiative led by the local professional fisheries association, with the support of civil society on the island of Amorgos, which resulted in the establishment of a no-take zone through a Presidential Decree. The initiative is now regarded as a model for other areas of Greece, as reflected by Greece's Prime Minister during a local visit to the island. While several factors and actors contributed to the success of the particular initiative, there is little doubt that the legal provisions of the Nature Directives and the consequent implementation requirements played an important role in creating the institutional and policy conditions that have gradually normalized conservation measures and increased their acceptance among local communities.

The legal provisions of the Nature Directives, and funding from the EU LIFE Programme, have allowed this progress to take place. They have played an important role not only in the design, financing and implementation of individual conservation actions, but also in

[7] For more information: https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive/large-carnivores/eu-large-carnivore-platform/eu-regional-large-carnivore-platforms/national-platform-greece_en and https://callisto.gr/paratiritirio-gia-ta-megala-sarkofaga/
[8] For more information: https://amorgorama.com/en/ and https://cycladespreservationfund.org/programs/amorgorama/

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generating scientific knowledge, methodologies and planning tools that can subsequently be incorporated into national conservation policy and administrative practice.

At the same time, progress remains incomplete. Although conservation objectives have now been adopted, they still need to be further complemented and refined, a process that is expected to continue following the latest conclusion of the most recent Birds and Habitats monitoring cycle and submission of national reports in 2025. The designation of Natura 2000 sites as national protected areas is still pending as is the adoption and implementation of conservation measures (see below on Art 6(1) Other remaining challenges include gaps in ecological knowledge, particularly regarding the management and accessibility of biodiversity data, uneven institutional capacity and coordination, the need for stable long-term financing, and further improvements in the implementation of Appropriate Assessment (see below on Article 6(3)). These shortcomings point primarily to the need to complete and strengthen implementation, rather than to modify the substantive legal framework.

Article 6(1): establishing the basis for effective Natura 2000 management

Implementation of Article 6(1) has driven the gradual development of a more systematic framework for the management of Natura 2000 sites in Greece.

Biodiversity Law 3937/2011 aimed to simplify the national provisions for the designation of conservation objectives in all Natura 2000 sites; however, significant delays, methodological issues and gaps in knowledge, as noted in the 2018 Opinion of the Greece's advisory scientific body, the Nature 2000 Committee, meant that early versions of the proposed conservation objectives could not be adopted at the time[9]. In 2020, the Court of Justice of the EU (C-849/19) found that Greece had failed to establish the necessary conservation objectives and measures for Sites of Community Importance[10]. Since then, progress has been made, including the adoption of national and site-specific conservation objectives for habitat types, species of Community interest and bird species[11] for a significant number of Natura 2000 sites, with the approval of the Nature 2000 committee[12].

The recent adoption of conservation objectives should not be viewed as the end of the process. The framework established under Article 6 allows objectives and conservation

[9] Nature 2000 Committee. (2018). *Opinion on the conservation objectives of Natura 2000 sites* (May 2018). Ministry of Environment and Energy. (in Greek), https://ypen.gov.gr/wp-content/uploads/legacy/Files/Perivallon/Diaxeirisi%20Fysikoy%20Perivallontos/Epitropi%20Fysi%202000/2018May_Epitropi%20Fysi%202000%20Gnomodotisi_stochoi_NATURA2000.pdf

[10] Court of Justice of the European Union. (2020). *Judgment of the Court (Sixth Chamber) of 17 December 2020, European Commission v Hellenic Republic, Case C-849/19, ECLI:EU:C:2020:1047.*, https://infocuria.curia.europa.eu/tabs/affair?lang=EN&sort=AFF_NUM-DESC&searchTerm=%2522C%252D849%252F19%2522&publishedId=C-849%2F19

[11] *Establishment of conservation objectives for natural habitat types and species of the Natura 2000 network* [Ministerial Decision YPEN/DDFPB/24776/985/2023, Government Gazette B' 1807/2023]. (in Greek)

[12] Nature 2000 Committee. (2023a). *Opinion of the Nature 2000 Committee on the amendment of the Ministerial Decision establishing national conservation objectives for natural habitat types and species of Union interest* (15 February 2023). Ministry of Environment and Energy. (in Greek), https://ypen.gov.gr/wp-content/uploads/2023/03/20230302_EF2000_Opinion_YA_TopikoiStoxoiDiatirisis.pdf; Nature 2000 Committee. (2023b). *Opinion of the Nature 2000 Committee on the draft Ministerial Decision establishing conservation objectives for natural habitat types and species of Union interest in Special Areas of Conservation (SACs) and Sites of Community Importance (SCIs) of the national Natura 2000 network* (2 March 2023). Ministry of Environment and Energy. (in Greek). https://ypen.gov.gr/wp-content/uploads/2023/03/20230302_EF2000_Opinion_YA_TopikoiStoxoiDiatirisis.pdf; Nature 2000 Committee. (2023c). *Opinion of the Nature 2000 Committee on the draft Ministerial Decision establishing conservation objectives for bird species under Article 4(1) and (2) of Directive 2009/147/EC in Special Protection Areas (SPAs) of the national Natura 2000 network* (10 April 2023). Ministry of Environment and Energy. (in Greek) https://ypen.gov.gr/wp-content/uploads/2023/04/20230410_EF2000_Opinion_SPAs_Cons_Objectives.pdf

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measures to be refined as new monitoring data become available. Indeed, the conservation objectives are expected to be further updated and complemented on the basis of new monitoring and reporting data under Article 17 of the Habitats Directive and Article 12 of the Birds Directive. The need to meet the requirements of Article 6(1) led to the development of a common national methodology for defining site-specific conservation objectives and conservation measures, drawing on the expertise of Greece's scientific community and conservation practitioners and ensuring greater consistency and scientific coherence across the Natura 2000 network.

The legal adoption of management plans envisaged under the current Natura 2000 framework is still pending. While a limited number of management plans have been prepared or adopted for specific areas or purposes, these do not yet constitute the site-specific management plans, required by law. The process has been particularly complex in Greece because of the national legal framework, under which Natura 2000 sites are also designated and regulated through national protected-area instruments. The preparation of Special Environmental Studies (SESs), Presidential Decrees and management plans has therefore been a lengthy process, currently being carried out through a large ERDF co-funded project and further affected by reforms to the planning framework adopted in 2020.

Nevertheless, implementation is now advancing: the approval of Special Environmental Studies, which provide the necessary documentation for the designation of protected areas, covering all Natura 2000 sites, is underway and draft Presidential Decrees are under preparation. By May 2026, 14 Special Environmental Studies (SESs) and part of one additional study had been approved, covering 322 of Greece's 446 Natura 2000 sites and more than 75% of the network's total area in the country.[13] This represents significant progress towards the completion of the institutional framework for the protection and management of protected areas. Although the studies do not, in themselves, establish the legal protection regime for the areas concerned, they create a binding framework that the public administration must take into account when adopting subsequent regulatory and administrative acts. The first Presidential Decree resulting from this process has been adopted for Gyaros (2026), while its Management Plan is pending adoption. In addition, two new National Marine Parks have been announced that will integrate many of the existing Natura 2000.

The approved SESs to date, previous Presidential Decrees (e.g. for Zakynthos, Kyparissiakos, Mt Olympus), protective Joint Ministerial Decisions of restricted duration, and a limited number of management plans prepared to support specific conservation actions or address particular threats have also contributed to the implementation of conservation measures in individual Natura 2000 sites.

The legal obligations established by the Nature Directives, together with EU enforcement, have been central drivers of the progress outlined above.

[13] Ministry of Environment and Energy. 2026. *Natura 2000 Day: Two New Special Environmental Studies for Thessaloniki, Halkidiki, Arta and Preveza – Special Environmental Studies Now Cover More Than 75% of the Natura 2000 Network in Greece*. Press release, 21 May 2026. https://ypen.gov.gr/imera-natura-2000-2-nees-epm-gia-thessaloniki-chalkidiki-arta-kai-preveza-eidikes-perivallontikes-meletes-gia-pano-apo-to-75-tis-ektasis-tou-diktyou-natura-2000-stin-ellada

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Moreover, despite the gaps in implementation, in Greece's Natura 2000 sites conservation and management measures, including habitat conservation and restoration, dedicated activities to support recovery of endangered species, access regulation, restrictions on the type and scale of permitted activities, terrestrial and marine conservation measures, monitoring and awareness-raising, education and capacity building activities, are implemented by NECCA and its Management Units, forestry and other competent authorities, as well as by projects and initiatives by environmental organizations and scientific bodies supported through EU and national public funds and private funding. The impact of these activities is outlined in the effectiveness section above.

The establishment of NECCA has also enabled a more coherent and coordinated implementation and oversight of conservation measures across the Natura 2000 network than was previously possible under the management bodies, which were not centrally overseen.

It should also be noted that the monitoring and reporting obligations under Articles 12 and 17 have strengthened the scientific basis for site management by generating nationwide biodiversity data that are now used to review conservation objectives, and to identify and implement management measures. Biodiversity data generated through monitoring, reporting and various projects, particularly those publicly and EU funded, should be accessible and available across authorities and procedures, reducing duplication and making better use of existing knowledge. The priority should therefore be to consolidate the capacity built over more than three decades and address remaining implementation gaps, rather than weaken or simplify the Nature Directives' substantive safeguards.

In addition, progress has been particularly notable in the marine environment, where Natura 2000 management planning is increasingly complemented by marine protected area governance reforms, fisheries management measures, and locally supported or community-led conservation initiatives.

While the formal conservation framework remains incomplete, over time stronger legal, institutional and on-the-ground conservation action has developed under the impetus of the Nature Directives. The trajectory from a long-standing implementation gap, including the 2020 CJEU judgment, towards the progressive establishment of conservation objectives, planning instruments and a nationwide management structure also illustrates the role of the EU legal framework and enforcement in driving corrective action and strengthening national implementation.

The Greek experience demonstrates that Article 6(1) provides an appropriate and sufficiently flexible legal framework for establishing conservation objectives and conservation measures. The principal challenges have arisen not from the design of the provision itself, but from the time, institutional framework and capacity and scientific knowledge and data required for its implementation. Recent progress illustrates that once these enabling conditions are in place, Article 6(1) effectively supports coherent conservation planning and management. The priority should, therefore, be to complete and operationalize the existing framework rather than modify its legal requirements.

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Efficiency

Experience from Greece suggests that the administrative burden arising directly from the Nature Directives should be distinguished from costs resulting from delayed, incomplete or inconsistent implementation. After more than three decades, the requirements of the Nature Directives are well established and have become integrated into nature conservation planning and implementation, environmental impact assessment, permitting, spatial planning and administrative practice. Many of the costs historically attributed to the Nature Directives have in fact resulted from delayed, incomplete or inconsistent implementation, fragmented governance, insufficient biodiversity data and incomplete conservation planning, rather than from the substantive obligations established by the legislation itself.

This distinction is important when considering both financial costs and administrative burden. Effective implementation of conservation action necessarily requires investment in monitoring, protected-area management, specialized staff, conservation and restoration measures, environmental assessment and enforcement. These investments should be distinguished from both the legitimate compliance costs associated with environmental safeguards and the avoidable administrative costs generated by delayed, incomplete or inconsistent implementation.

As implementation has progressed, the application of the Nature Directives has become more efficient. Authorities, businesses, consultants and stakeholders have developed increasing familiarity with Natura 2000 requirements, while conservation objectives, monitoring methodologies and appropriate assessment procedures have become increasingly standardized. Regulatory familiarity and accumulated administrative expertise reduce transaction costs, improve predictability and facilitate more consistent decision-making.

The Greek experience also illustrates that implementation of the Nature Directives has generated lasting institutional capacity, improving both effectiveness and administrative efficiency. Environmental governance for nature conservation was historically fragmented; however, implementation of the Nature Directives has contributed gradually to a more coherent national governance system.

The establishment of NECCA is a prime example. NECCA builds on the experience gained by the former protected-area management bodies while creating a coordinated nationwide system for Natura 2000 management. This has strengthened the consistency of conservation management and the implementation of Article 6 requirements across the country.

The Nature 2000 Committee[14] is another example. Originally established through the transposition of the Habitats Directive, the Committee has evolved into Greece's main scientific advisory body on biodiversity conservation. The Committee has provided methodological guidance on nature monitoring, conservation objectives, protected-area governance and species action plans, helping to ensure consistency, effectiveness and reducing duplication in scientific and administrative decision-making. Its importance has been recognized repeatedly, most recently through the provision in Law 4685/2020 assigning NECCA responsibility for its administrative and financial support.

[14] https://ypen.gov.gr/perivallon/viopoikilotita/epitropi-fysi-2000/

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More broadly, implementation of the Nature Directives has contributed to the institutionalization of nature conservation responsibilities within permanent national structures, building on knowledge and capacity developed over time. It has also generated an important process of institutional learning and societal familiarization. Public administrations, stakeholders and local communities have become more accustomed to Natura 2000, its conservation objectives and the management of protected areas. As a result, nature conservation is now more firmly embedded in administrative practice across different levels of government and recognized as an established public policy objective. This accumulated institutional knowledge and administrative capacity constitute important efficiency gains that should be preserved and strengthened rather than disrupted through repeated institutional restructuring.

The Nature Directives have also improved the strategic allocation of biodiversity funding. Preparation of the Prioritised Action Framework under Article 8 has provided a common framework for identifying investment priorities and coordinating financing from LIFE, Cohesion Policy, the Common Agricultural Policy, the European Maritime, Fisheries and Aquaculture Fund and national resources. This has strengthened the strategic planning of biodiversity investments and has improved the alignment of conservation investments with Natura 2000 management needs. The PAF has also improved the visibility of Natura 2000 financing needs and facilitated their integration into broader national and EU funding programmes.

Overall, the Greek experience suggests that the principal efficiency gains arise not from reducing the legal obligations established by the Nature Directives, but from completing their implementation and strengthening the institutional capacity required for their effective application.

Article 6(3): Appropriate Assessment

Experience from Greece demonstrates the practical value of Article 6(3) as a precautionary and preventive environmental safeguard. Appropriate Assessment has influenced planning and permitting decisions, by preventing unacceptable impacts, correcting inadequate assessments and improving project design. Remaining problems concern the consistency and quality of implementation, rather than the principle of and legal provision for Appropriate Assessment.

This should be regarded as evidence of the provision working as intended, rather than as an administrative failure or unnecessary burden. The fact that a project is modified or cannot proceed because significant adverse effects cannot be excluded should not in itself be counted as evidence of administrative inefficiency or disproportionate burden; it instead demonstrates the preventive safeguard operating as intended. Article 6(3) helps ensure that development takes place within ecological limits by requiring impacts, alternatives and mitigation measures to be considered before irreversible decisions are taken.

Greek administrative and judicial practice provides concrete evidence of the preventive role of Article 6(3). Projects have been modified, refused permits or had permits annulled

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where impacts on Natura 2000 sites or protected species could not be adequately assessed or where adverse effects could not be excluded. A notable example concerns proposals for a large-scale wind energy development in Natura 2000 sites of the southern Aegean ("the Greek Galapagos"), where the examination of the environmental and appropriate assessment identified unacceptable risks for internationally important seabird populations and the projects did not proceed. The Council of State has consistently interpreted the requirements of Appropriate Assessment in line with the case law of the Court of Justice of the European Union, reinforcing its precautionary character and contributing to its improved implementation.

Where avoidable delays and uncertainty have occurred, these have often been associated with missing conservation objectives, inadequate ecological knowledge and scientific data, uneven administrative expertise or incomplete procedures. What may appear to be an "Article 6 burden" can therefore in practice be a consequence of incomplete Article 6 implementation. For example, the delayed establishment of site-specific conservation objectives (mentioned in the previous section) affected both the quality and the legal certainty of Appropriate Assessments.

Furthermore, challenges remain in ensuring that Article 6(3) considerations are integrated sufficiently early in strategic planning processes. This was among the main concerns raised by the European Commission in infringement procedure INFR(2014)4073 concerning the 2008 Special Spatial Plan for Renewable Energy Sources. The ongoing revision of the spatial planning framework for renewable energy provides an opportunity to address these shortcomings by integrating biodiversity constraints earlier in decision-making and reducing conflicts at the project permitting stage.

In addition, recent legislative amendments, together with guidance developed by NECCA, have clarified that plans and activities capable of significantly affecting Natura 2000 sites are subject to Appropriate Assessment even where they do not require Environmental Impact Assessment under national legislation. This extends biodiversity safeguards to activities that might otherwise receive limited environmental scrutiny, such as certain recreational or sporting activities organized within protected areas.

In practice, many projects proceed following modifications that avoid or reduce impacts on Natura 2000 sites, demonstrating that Article 6(3) functions also as a tool for improving project design through avoidance, mitigation and the consideration of alternatives. Experience from Greece therefore suggests that Article 6(3) has not prevented development as such; rather, as its implementation has matured, it has improved the environmental quality and legal robustness of development decisions.

Article 6(4)

Experience with Article 6(4) further illustrates the importance of distinguishing deficiencies in national implementation from deficiencies in the EU legal framework. In Greece, the provision has not been operationalized through a clear and comprehensive national procedural framework, resulting in limited practical experience and uncertainty regarding its consistent application in practice.

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EU guidance and Court of Justice case law have progressively clarified the interpretation and application of Article 6(4), including the exceptional conditions relating to imperative reasons of overriding public interest, the lack of alternative solutions and compensatory measures. The Greek experience therefore points to the need for clearer national procedures, guidance and administrative capacity for applying Article 6(4), rather than simplification of the substantive EU-level requirements.

Coherence

The Nature Directives are mutually supportive and have progressively become embedded in the wider framework of biodiversity and environmental policy in Greece. Their coherence is reflected most clearly in the Natura 2000 network itself, which brings together Special Protection Areas under the Birds Directive and sites protected under the Habitats Directive within a common conservation framework. Their coherence is reflected most clearly in the Natura 2000 network itself, which brings together Special Protection Areas under the Birds Directive and Special Areas of Conservation protected under the Habitats Directive within a common conservation framework, avoiding the creation of separate protection systems for birds, habitats and species.

The implementation of the Nature Directives in Greece also provides a coherent and efficient mechanism for contributing to several global and regional biodiversity commitments, as they constitute the main EU framework through which obligations under such agreements as the Convention on Biological Diversity[15], the Ramsar Convention, and the Bonn and Bern Conventions, among others, are met. The Natura 2000 network and the monitoring and biodiversity data generated under the Directives provide an important basis for tracking and reporting progress towards these commitments.

The continued value of this framework is demonstrated by the extent to which subsequent biodiversity policies have been built upon it. A particularly relevant example is Greece's national restoration framework under Law 5037/2023, which established national 2030 biodiversity protection and restoration targets, including through measures targeting Natura 2000 sites. This illustrates an important policy progression: the Nature Directives established the protected-area, species and habitat framework upon which more recent restoration objectives could build. Rather than creating a parallel policy framework, more recent restoration policy builds on the ecological, spatial and governance architecture progressively established through the Nature Directives. The Directives therefore complement, rather than duplicate, newer EU biodiversity policy, including the EU 2030 Biodiversity Strategy and the Nature Restoration Regulation.

The practical relationship between protection and restoration is also visible in decades of conservation action in Greece. LIFE-supported restoration actions have included the restoration of wet meadows at Lake Mikri Prespa, *Pinus nigra* forests on Mount Parnonas,

[15] Convention on Biological Diversity (CBD). (2019). *Sixth National Report to the Convention on Biological Diversity: Greece*. Clearing-House Mechanism, https://chm.cbd.int/en/database/record?documentID=248558&_gl=1*1qmt2pe*_ga*MjA0NjIyMTY2Ni4xNzg0ODA0NzEw*_ga_7S1TPRE7F5*czE3ODQ4MDQ3MTAkbzEkZzEkdDE3ODQ4MDQ3NDckajIzJGwwJGgw

coastal dunes with *Juniperus* species in Crete and coastal wetlands on Andros. These examples demonstrate how the Natura 2000 framework has provided a practical basis for restoration action well before restoration became a more explicit and comprehensive component of EU biodiversity policy.

The Nature Directives are no longer a stand-alone conservation instrument; they are the organizing framework around which EU and Greek biodiversity policy has developed.

The Nature Directives are also closely integrated with other core elements of EU environmental law, particularly environmental assessment and spatial planning, but also water and marine protection policy. In Greece, plans are subject to Strategic Environmental Assessment and, where they are likely to have a significant effect on Natura 2000 sites, to the requirements of Article 6(3) of the Habitats Directive, while Appropriate Assessment is integrated into project-level environmental assessment. Earlier experience documented this interaction in major planning processes, including the Regional Spatial Plan for Attica and planning related to hydrocarbon exploration in Western Greece. More recently, the ongoing revision of the Special Spatial Plans for Renewable Energy Sources and Tourism provides an opportunity to integrate biodiversity constraints, conservation objectives and ecological knowledge and scientific data earlier in strategic planning, reducing conflicts at the project-permitting stage.

Furthermore, over time, sectoral policies, such as fisheries, agriculture, energy, transport, and tourism, have increasingly integrated the objectives of the Nature Directives. In the marine environment, implementation is increasingly coordinated with the Common Fisheries Policy through fisheries management measures within Natura 2000 sites, demonstrating growing coherence between biodiversity conservation and sustainable fisheries management. In the agricultural sector, agri-environmental and forestry measures and rural development measures have promoted biodiversity-friendly farming practices and have integrated habitat and species conservation measures. Further progress could have been achieved if EU policies had integrated stronger biodiversity considerations, in line with the provisions of the EU Green Deal. At the national level, greater coherence has been hampered by delays in the development of key environmental governance tools, including spatial planning, the cadastre, and the forest registry.

The Greek experience therefore demonstrates coherence at two levels: the Nature Directives provide a stable foundation upon which subsequent biodiversity and restoration policies have been built, while their requirements increasingly inform wider environmental and sectoral decision-making. Where tensions remain, the Greek experience points primarily to gaps in the practical integration of biodiversity objectives into sectoral planning and implementation, rather than to inconsistencies inherent in the Nature Directives themselves.

Final remarks

The Greek experience demonstrates the long-term value of a stable EU nature conservation framework. Over more than three decades, implementation of the Nature Directives has

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contributed not only to the protection of species, habitats and the Natura 2000 network, but also to the progressive development of the institutions, scientific knowledge, conservation planning, administrative capacity and public investment required to implement nature conservation policy. This evolution is particularly significant in a country where biodiversity governance and administrative capacity were historically fragmented. The development of a nationwide protected-area governance structure, more systematic conservation planning and monitoring, Species Action Plans, greater integration of biodiversity into permitting and planning, and growing institutional and societal familiarity with Natura 2000 demonstrate that implementation capacity can develop and mature over time within a stable legal framework. Significant gaps remain, including the completion and operationalisation of conservation measures, adequate long-term financing, stronger enforcement, better coordination and data accessibility, and fuller integration of biodiversity objectives into sectoral policies. However, the progress achieved demonstrates that these challenges can and should be addressed within the existing framework.

The Greek experience therefore supports maintaining the existing legal architecture of the Nature Directives while focusing future efforts on improving their implementation, institutional framework, capacity and enforcement.