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To: The representatives of the Institutions in Greece  
Delia Velculescu, IMF  
Declan Costello, European Commission  
Rasmus Ruffer, European Central Bank

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Athens, December 21<sup>st</sup>, 2015

Attached, please find the English version of selected chapters of the 2015 annual environmental law review, which was announced by WWF Greece in October. The specific chapters cover the most important developments in the areas of a) Greece's economic adjustment programmes, b) energy and climate change, and c) nature and biodiversity.

Since 2011, when the first Medium Term Fiscal Strategy was agreed, Greece has been undergoing an unprecedented regression in environmental safeguards and a serious rollback of the sustainability agenda. These developments, together with the lost opportunities that would have led Greece's way out of the crisis and towards a living economy, is consistently recorded in our annual law reports. WWF Greece's law review, addressing politicians, law experts and citizens alike, now runs its eleventh year of issue and aims to shed light on the often incomprehensible institutional framework and court rulings dictating or undermining the protection of the environment in Greece.

The findings of this year's report are indeed alarming: dramatic decline in the quality of legislation and the transparency of the law making process; torrential loss of critical environmental safeguards, particularly in the domain of forest protection and environmental impact assessment; paralysis of the national system of protected areas; threats to valuable natural habitats by unsustainable development projects; continued downgrading and undermining of the environmental inspectorate; utter contempt for EU law in the environmental licensing and the operation of lignite power plants; licencing of a new, heavily polluting lignite power plant in Ptolemaida, which will cost at least 1,4 billion euros and will be financially unsustainable in the framework of EU climate policy; increasing lack of transparency in the Green Fund; never ending legalisation of illegal buildings and land uses, at the expense of legal certainty and equality, and with a huge environmental cost and an incalculable loss of revenues from the uncollected financial penalties.

WWF believes that there is a shared responsibility between the Institutions and the Greek Government for the environmentally dramatic consequences of the policies and measures agreed under the Programme, which are described in detail in the attached report. The governments of Greece use the economic crisis as an excuse for the promotion of environmental deregulation in order to serve the established clientelist system of governance, thus undermining the prospects for the development of a truly living and sustainable Greek economy. The Institutions are equally responsible for supporting measures of a development model based on narrowly defined economic objectives that can only lead towards a larger ecological deficit and a more profound crisis.



Based on the findings and conclusions of this review, we urge the Institutions, under your representation, to revisit the unsustainable development model, which is currently being promoted in Greece, and support the much needed shift towards a living economy.

Yours sincerely,

A handwritten signature in black ink, appearing to read "D. Karavellas", is centered below the text "Yours sincerely,".

Demetres Karavellas  
Director WWF Greece