

28 November 2023

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the third payment request submitted by Greece on 16 May 2023 and on 22 November 2023, 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 16 May 2023 and on 22 November 2023 respectively, Greece submitted two requests for payment for the third instalment of the non-repayable support and the third instalment of the loan support. The payment requests were accompanied by the required management declarations and summaries of audits.

To support its payment requests, Greece provided due justification of the satisfactory fulfilment of the 43 milestones and targets of the third instalment of the non-repayable support and the loan support, as set out in Section 2.4 and Section 3.4 of the Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece¹.

For 4 milestones and targets covering a large number of recipients, in addition to the summary documents and official listings provided by Greece, Commission services have assessed a statistically significant sample of individual files. The sample size has been uniformly set at 60 which corresponds to a confidence level of 95% or above in all cases.

In its payment requests, 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 requests, 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 43 milestones and targets.

The milestones and targets positively assessed as part of these payment requests 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 enhance efficiency in the public administration, including through the division of responsibilities between central, regional and local authorities, to accelerate the delivery of justice, and to enhance the fight against corruption and smuggling. Further reforms concern addressing weaknesses in urban planning, upskilling for employees and those unemployed, establishing a new water and wastewater regulatory authority for a more rational management of water resources, strengthening market regulation for public urban and regional passenger transportation services, and improving the regulatory framework for industrial parks. The milestones and targets also confirm progress towards the completion of investment projects related to electromobility and charging infrastructure for electric vehicles, the launch of projects relating to energy-efficiency renovations in residential buildings, the digitalisation of public administration, and the uptake of fibre optic infrastructure in buildings. One of the targets concerns the Loan Facility, which aims to support private

¹ ST 10152 2021 INIT and ST 10152 2021 ADD 1, not yet published.

investment related to the green transition, digitalisation, increasing export capacity, economies of scale and innovation. This target provides for at least EUR 3,518.4 million of contracts signed by financial institutions with final beneficiaries.

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.

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Number: 21	Related Measure: Renovate – Energy renovation on residential buildings (Measure ID: 16872)	
Name of the Milestone: Residential renovation – 2 nd round launch including energy poor households		
Qualitative Indicator: Entry into force of a Joint Ministerial Decision		Time: Q3 2022
<p>Context:</p> <p>The main objective of this investment is to improve, through renovations, the energy efficiency of residential buildings resulting in significant primary energy savings, thus contributing to the relevant NECP targets. The investment also includes allocating funds that are specifically designated to aid energy poor residences. The investment needs to comply with the Do No Significant Harm (DNSH) principle, which implies that the measure requires economic operators to ensure that at least 70% of the generated construction waste shall be prepared for re-use, recycling, and other material recovery processes.</p> <p>Milestone 21 concerns the entry into force of a Joint Ministerial Decision (JMD) to launch the programme for the second-round renovations and the launch of the Programme for the energy poor residences, including setting up a selection process to ensure that the primary energy consumption of residences is reduced by at least 30% compared to the residence’s performance calculated in kWh/m². Additionally, the JMD shall set out: the implementation mechanism; provisions for energy poor residences, in accordance with criteria set out in the adopted energy poverty action plan; a certification mechanism to validate actual primary energy savings achieved; and a timeline.</p> <p>Milestone 21 is the second milestone of the investment, and it follows the completion of milestone 20, related to the first round of renovations and the launch of programme. It is followed by milestone 22 (due in Q4 2022) and consecutive targets 23 (due in Q4 2023), 24 (due in Q4 2024) and 26 (due in Q4 2025), related to completion of the completion of renovations to improve energy efficiency for 105,000 residences, equivalent to energy reduction of 213 ktoe and with primary energy savings, on average, of at least 30%. Further, target 25 (due in Q4 2025) concerns the renovation of 50,000 residences for energy poor households equivalent to primary energy savings, on average, of at least 30%. The investment has a final expected date for implementation in Q4 2025.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. Copy of the publication in the Official Journal for the Joint Ministerial Decision by the Alternate Minister of Finance, the Deputy Minister of Development and Investments and the Minister of Environment and Energy ΥΠΕΝ/ΕΣΠΑΕΝ/118225/2849 (Official Journal B’ 5778/10.12.2021, “Proclamation of the Energy Saving 2021 program, to be implemented under the Recovery and Resilience Fund”). The Joint Ministerial Decision sets out that this secondary legislation enters into force with the publication of this Joint Ministerial Decision in the Official Journal. ii. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. <p>The authorities also provided:</p> <ol style="list-style-type: none"> iii. A list of four amendments to the abovementioned Joint Ministerial Decision: 		

- a. Copy of the publication of the amendment (1st) of the Joint Ministerial Decision “Proclamation of the Energy Saving 2021 program, to be implemented under the Recovery and Resilience Fund” ΥΠΕΝ/ΕΣΠΑΕΝ/14268/166 (Official Journal B’ 684/16.02.2022).
 - b. Copy of the publication of the amendment (2nd) of the Joint Ministerial Decision “Proclamation of the Energy Saving 2021 program, to be implemented under the Recovery and Resilience Fund” ΥΠΕΝ/ΕΣΠΑΕΝ/31094/351 (Official Journal B’ 1600/04.04.2022).
 - c. Copy of the publication of the amendment (3rd) of the Joint Ministerial Decision “Proclamation of the Energy Saving 2021 program, to be implemented under the Recovery and Resilience Fund” ΥΠΕΝ/ΕΣΠΑΕΝ/75356/1097 (Official Journal B’ 3932/25.07.2022).
 - d. Copy of the publication of the amendment (4th) of the Joint Ministerial Decision “Proclamation of the Energy Saving 2021 program, to be implemented under the Recovery and Resilience Fund” ΥΠΕΝ/ΕΣΠΑΕΝ/75356/1097 (Official Journal B’ 5111/30.09.2022).
- iv. Copy of the publication in the Official Journal of the Energy Poverty Action Plan (Ministerial Decision by the Ministry of Environment and Energy ΥΠΕΝ/ΓΔΕ/89335/5599 (Official Journal B’ 4447/28.09.2021).

Analysis:

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

Entry into force of a Joint Ministerial Decision to launch the programme for the second-round renovations and the launch of the Programme for the energy poor residences, including setting up a selection process to ensure that the primary energy consumption of residences is reduced by at least 30% compared to the residence's initial performance calculated in kWh/m².

The Joint Ministerial Decision ΥΠΕΝ/ΕΣΠΑΕΝ/118225/2849 (Official Journal B’ 5778/10.12.2021) entered into force on 10 December 2021 in accordance with the final provision of the same Joint Ministerial Decision. The Joint Ministerial Decision launched the programme for the second round of renovations, including energy poor residences and a selection process to ensure that the primary energy consumption of residences is reduced by at least 30% compared to the residence's initial performance (as detailed below), in line with the milestone description. It includes a detailed Guidance Manual as Annex, which provides information on all elements referred to in the milestone for launching the second round of residential renovations.

The Joint Ministerial Decision shall set out: - Implementation mechanism; - Selection process to achieve set primary energy saving target; - Provisions for energy poor residences, in accordance with criteria set out in the adopted energy poverty action plan - Certification mechanism to validate actual primary energy savings achieved (incl. details of possible corrective actions to ensure that primary energy saving target is met); and - Timeline.

In particular, in line with the requirements of the milestone:

- i. Section 3 of the Guidance Manual states that the programme provides incentives for energy saving renovations in the residential sector aiming to reduce energy needs for households. Eligible interventions include the replacement of household frames (windows/doors etc.), installation/upgrading of thermal insulation, heating/cooling system upgrade, domestic hot water systems and other smart technologies.

- ii. Sections 5 and 9 of the Guidance Manual set out the *implementation mechanism*, which entails the specifications of the application process and the supporting documents each applicant needs to submit; and the definition of entities responsible for evaluating the applications and overseeing the overall management of this round of renovations.
- iii. Sections 3, 4 and 5 set out the *selection process*, including the primary energy saving target each renovation is required to achieve, the list of eligible interventions, the evaluation and selection criteria (where a reduced cost of energy is associated with higher scores), the modality of submission and assessment of applications. In particular, as set out in the Guidance Manual (Section 3.1) each renovation is expected to result in an upgrade of, at least, three energy performance classes (also stated in Section 1.1) compared to the initial certified energy class. Thereafter, the Guidance Manual (Section 3.2) sets out the eligible interventions per category (for example frames/ventilation, insulation and heating/cooling systems). According to Section 3.1, for all types of application (individual apartments, single-family houses, multi-apartment buildings), the mandatory upgrading of three energy classes is required to ensure more than 30% of primary energy savings.
- iv. Section 2.2 and 4.3 include specific provisions for energy poor residences, in accordance with criteria set out in the adopted energy poverty action plan (explained in detail below).
- v. Sections 5.3, 6.2 and 9 set out the *certification mechanism*, which entails the energy performance certificates that each approved application will need to submit to validate the primary energy savings achieved by each renovation. The certificates are based on energy inspection of the buildings carried out by energy inspectors before and after the renovation works, according to the framework for the Energy Performance of Buildings Regulation (Ministerial Decision ΥΠΕΝ/ΔΕΠΕΑοικ/178581 (Official Journal Β' 2367/12.07.2017)). The details of possible corrective actions to ensure that primary energy saving target is met, are set out in Section 7.5. In particular, in case the beneficiary wants to modify the combination of interventions, it needs to be ensured that the new combination of interventions achieves the minimum energy target on the basis of the certification mechanism.
- vi. Section 6.2 sets out the timeline to be followed. Within a period of twelve months (which can be extended of further 9 months) from the date of acceptance of the project, the entire physical and financial actions must have been completed.
- vii. Sections 2, 5.1 and 5.2 set out the eligibility criteria and information to be provided by each applicant.

Specific provision for earmarked funds to target energy poor residences, as defined by criteria of the energy poverty action plan.

Section 2.2 of the Guidance Manual elaborates upon the element concerning provisions for energy poor households (with individual income of less than EUR 5,000 or family income below EUR 10,000). The chapter highlights several incentives for the support of energy poor households and vulnerable groups in the form of increased rates of grant support (see table 2.2.2 of the Guidance Manual). In addition, the Guidance in section 4.3 foresees a 100% guarantee for loan agreements undertaken by energy poor households, through which the Greek government ensures the repayment of the loan in case mortgage holders are not capable of paying the instalments. Furthermore, in line with the description of the milestone, based on Table 1.3.1 of the Guidance Manual, 17.8% (EUR 201 million) of the earmarked funds (EUR 1.138 billion) target energy poor households. Section 4.3 on page 46 of the Energy Poverty Action Plan (Ministerial Decision ΥΠΕΝ/ΓΔΕ/89335/5599 (Official Journal Β' 4447/28.09.2021)) specifies that the economic criteria for identifying energy-poor households for the year 2019 was annual income based on normalized household members including non-financial support, which identifies a median price of EUR 4,400. Due to the consequences of the increase in energy cost and inflation, the threshold for energy-poor households has been increased to EUR 5,000. Based on this, for the purposes of this programme, energy poor households are identified as those

whose annual income falls below EUR 5,000 per individual in line with the criteria of the energy poverty action plan.

Furthermore, in line with the description of the measure, **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.

Regarding the DNSH waste management requirements set out in the Council Implementing Decision, the Guidance Manual (Section 3.1 and 9) for this call for applications imposes that each economic operator carrying out the construction works for the approved renovation needs to comply with a Joint Ministerial Decision (Official Journal B 1312/24.08.2010), 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. In particular:

- in case the work has been assigned to a contractor, the contractor signs a declaration, confirming that the waste has been managed in accordance with the national legal framework for the re-use, recycling and other material recovery of the non-hazardous construction and demolition waste generated on the construction site; or
- in case work has not been assigned to a contractor, the beneficiary and the energy auditor sign a declaration, confirming that the waste handling has been carried out according to the said national legal framework or that no waste has been produced during the renovation works.

The Joint Ministerial Decision (Official Journal B 1312/24.08.2010), which applies to the call for applications for the renovations actions which are part of this programme (Section 3.1 and 9), 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.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 22	Related Measure: Renovate – Energy renovation on residential buildings (Measure ID: 16872)	
Name of the Milestone: Residential renovation – 3 rd round launch including energy poor households		
Qualitative Indicator: Entry into force of a Joint Ministerial Decision		Time: Q4 2022
Context:		
The main objective of this investment is to improve, through renovations, the energy efficiency of residential buildings resulting in significant primary energy savings, thus contributing to the relevant NECP targets. The investment also includes allocating funds that are specifically designated to aid		

energy poor residences. The investment needs to comply with the Do No Significant Harm (DNSH) principle, which implies that the measure requires economic operators to ensure that at least 70% (by weight) of the generated construction waste shall be prepared for re-use, recycling, and other material recovery processes.

Milestone 22 requires the entry into force of a Joint Ministerial Decision (JMD) to launch the programme for the third-round renovations and the launch of the Programme for the energy poor residences, including setting up a selection process to ensure that the primary energy consumption of residences is reduced by at least 30% compared to the residence's performance calculated in kWh/m². Furthermore, the JMD needs to include: the implementation mechanism; provisions for energy poor residences, in accordance with criteria set out in the adopted energy poverty action plan; a certification mechanism to validate actual primary energy savings achieved; and a timeline.

Milestone 22 is the third milestone of the investment, and it follows the completion of milestones 21 and 20, related to the first and second-round of renovations and the launch of programme. It will be followed by consecutive targets 23 (due in Q4 2023), 24 (due in Q4 2024) and 26 (due in Q4 2025), related to completion of the completion of renovations to improve energy efficiency for 105,000 residences, equivalent to energy reduction of 213 ktoe and with primary energy savings, on average, of at least 30%. Further, target 25 (due in Q4 2025) concerns the renovation of 50,000 residences for energy poor households equivalent to primary energy savings, on average, of at least 30%. The investment has a final expected date for implementation in Q4 2025.

Evidence provided:

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

- i. Copy of the publication in the Official Journal for the Joint Ministerial Decision by the Ministry of Finance, the Minister of Development and Investments, the Minister of Labour and Social Affairs and the Minister of Environment and Energy ΥΠΕΝ/ΥΔΕΝ/51828/761 (Official Journal B' 3131/11.05.2023, "Announcement of the Program Save - Renovate for young people"). The Joint Ministerial Decision sets out that this secondary legislation enters into force with the publication of this Joint Ministerial Decision in the Official Journal.
- ii. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.

The authorities also provided:

- iii. Copy of the publication in the Official Journal of the Energy Poverty Action Plan (Ministerial Decision by the Ministry of Environment and Energy ΥΠΕΝ/ΓΔΕ/89335/5599 (Official Journal B' 4447/28.09.2021).

Analysis:

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

Entry into force of a Joint Ministerial Decision to launch the programme for the third-round renovations including setting up a selection process to ensure that the primary energy consumption of residences is reduced by at least 30% compared to the residence's initial performance calculated in kWh/m².

The Joint Ministerial Decision ΥΠΕΝ/ΥΔΕΝ/51828/761 (Official Journal Β' 3131/11.05.2023) entered into force on 11 May 2023 in accordance with the final provision of the same Joint Ministerial Decision. More specifically, the program Save - Renovate for young people consists of two parts: one provides incentives for energy saving interventions in the domestic building sector, to reduce energy consumption. The budget for this part "Exoikonomo" is up to €200 million and is financed by resources from the Recovery and Resilience Facility. The budget for the other part "Anakainizo" is up to €100 million and is financed by national funds. Therefore, only the first part "Exoikonomo" is relevant and will be considered for this assessment. Through the first part "Exoikonomo", the Joint Ministerial Decision launched the programme for the third round of renovations, including a selection process to ensure that the primary energy consumption of residences is reduced by at least 30% compared to the residence's initial performance (as detailed below), in line with the milestone description. The Joint Ministerial Decision ΥΠΕΝ/ΥΔΕΝ/51828/761 includes a detailed Guidance Manual for "Exoikonomo" as Annex, which provides information on all elements referred to in the milestone for launching the third round of renovations.

The Joint Ministerial Decision shall set out: - Implementation mechanism; - Selection process to achieve set primary energy saving target; - Provisions for energy poor residences, in accordance with criteria set out in adopted energy poverty action plan; - Certification mechanism to validate actual primary energy savings achieved (incl. details of possible corrective actions to ensure that primary energy saving target is met); and - Timeline.

In particular:

- i. Section 3 of the Guidance Manual states that the programme provides incentives for energy saving renovations in the residential sector aiming to reduce energy needs for households. Eligible interventions include the replacement of household frames (windows/doors etc.), installation/upgrading of thermal insulation, heating/cooling system upgrade, domestic hot water systems and other smart technologies.
- ii. Sections 5 and 9 of the Guidance Manual set out the *implementation mechanism*, which entails the specifications of the application process and the supporting documents each applicant needs to submit; and the definition of entities responsible for evaluating the applications and overseeing the overall management of this round of renovations.
- iii. Sections 3, 4 and 5 set out the *selection process*, including the primary energy saving target each renovation is required to achieve, the list of eligible interventions, the evaluation and selection criteria (where a reduced cost of energy is associated with higher scores), the modality of submission and assessment of applications. In particular, as set out in the Guidance Manual (Section 3.1) each renovation is expected to result in an upgrade of, at least, three energy performance classes (also stated in Section 1.1) compared to the initial certified energy class. Thereafter, the Guidance Manual (Section 3.2) sets out the eligible interventions per category (for example frames/ventilation, insulation and heating/cooling systems). According to Section 3.1, for all types of application (individual apartments, single-family houses, multi-apartment buildings), the mandatory upgrading of three energy classes is required to ensure more than 30 % of primary energy savings.
- iv. Section 2.2 and 4.3 include specific provisions for energy poor residences, in accordance with criteria set out in the adopted energy poverty action plan (explained in detail below).
- v. Sections 5.3, 6.2 and 9 set out the *certification mechanism*, which entails the energy performance certificates that each approved application will need to submit to validate the primary energy savings achieved by each renovation. The certificates are based on energy inspection of the buildings carried out by energy inspectors before and after the renovation works, according to the new framework for the Energy Performance of Buildings Regulation (Ministerial Decision ΥΠΕΝ/ΔΕΠΕΑοικ/178581 (Official Journal Β' 2367/12.07.2017)). The details of possible corrective actions to ensure that primary energy saving target is met, are set out in Section 7.5. In particular, in case the beneficiary wants to modify the combination of

interventions, it needs to be ensured that the new combination of interventions achieves the minimum energy target on the basis of the certification mechanism.

- vi. Section 6.2 sets out the timeline to be followed. Within a period of twelve months (which can be extended of further 9 months) from the date of acceptance of the project, the entire physical and financial actions must have been completed.
- vii. Sections 2, 5.1 and 5.2 set out the eligibility criteria and information to be provided by each applicant.

Specific provision for earmarked funds to target energy poor residences, as defined by criteria of the energy poverty action plan.

Section 2.2 of the Guidance Manual elaborates upon the element concerning provisions for energy poor households (with individual income of less than EUR 5,000 or family income below EUR 10,000). The chapter highlights several incentives for the support of energy poor households and vulnerable groups in the form of increased rates of grant support (see table 2.2.2). In addition, the Guidance in section 4.3 foresees a 100% guarantee for loan agreements undertaken by energy poor households, through which the Greek government ensures the repayment of the loan in case mortgage holders are not capable of paying the instalments. Furthermore, in line with the description of the milestone, based on Section 1.3 of the Guidance Manual, 20% (EUR 40 million) of the funds (EUR 200 million) are earmarked to target energy poor households. Section 4.3 on page 46 of the Energy Poverty Action Plan (Ministerial Decision ΥΠΕΝ/ΓΔΕ/89335/5599 (Official Journal B' 4447/28.09.2021)) specifies that the economic criteria for identifying energy poor households for the year 2019 was annual income based on normalized household members including non-financial support, which identifies a median price of EUR 4,400. Due to the consequences of the increase in energy cost and inflation, the threshold for energy poor households has been increased to EUR 5,000. Based on this, for the purposes of this programme, energy poor households are identified as those whose annual income falls below EUR 5,000 per individual in line with the criteria of the energy poverty action plan.

Furthermore, in line with the description of the measure, **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.

Regarding the DNSH waste management requirements set out in the Council Implementing Decision, the Guidance Manual (Section 3.1 and 9) for this call for applications imposes that each economic operator carrying out the construction works for the approved renovation needs to comply with a Joint Ministerial Decision (Official Journal B 1312/24.08.2010), 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. In particular:

- i. in case the work has been assigned to a contractor, the contractor signs a declaration, confirming that the waste has been managed in accordance with the national legal framework

- for the re-use, recycling and other material recovery of the non-hazardous construction and demolition waste generated on the construction site; or
- ii. in case work has not been assigned to a contractor, the beneficiary and the energy auditor sign a declaration, confirming that the waste handling has been carried out according to the said national legal framework or that no waste has been produced during the renovation works.

The Joint Ministerial Decision (Official Journal B 1312/24.08.2010), which applies to the call for applications for the renovations actions which are part of this programme (Section 3.1 and 9), contain 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.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 27	Related Measure: Preparation of Urban Plans in implementation of the urban policy reform (Measure ID 16879)	
Name of the Milestone: Urban Plans award		
Qualitative Indicator: Notification of award of contracts		Time: Q4 2022
Context:		
<p>This reform aims at addressing weaknesses and gaps in zoning and land use to promote sustainable economic activity and protect the environment. Concretely, (1) Local Urban Plans will be prepared for 700 municipalities or municipal units, and (2) five Special Urban Plans (that can cover area of more than one municipality) will be produced. (3) The Development Rights Transfer Zones will be defined in 50 municipal units, (4) delimitation of settlements will be determined in 50 municipal units and (5) municipal roads will be determined in 120 municipal units. In total, measures will be implemented in at least 750 municipal units.</p> <p>Milestone #27 consists of the notification of award for 30% of the contracts for the five sub-projects listed above. The Local Urban Plans are to include a chapter on climate change measures and prevention and management of climate related risks.</p> <p>Milestone #27 is the first step of the implementation of the reform and it will be followed by Milestone #28 (due in Q4 2023) and Target #29 (due in Q4 2025). The reform has a final expected date for implementation in Q4 2025.</p>		
Evidence provided:		
<p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ul style="list-style-type: none"> i. 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; ii. Copy of 69 contract award notifications confirming that 31.85% of contracts have been awarded under sub-project 1; iii. Copy of 3 contract award notifications confirming that 60% of contracts have been awarded under sub-project 2; iv. Copy of 1 contract award notification confirming that 166% of contracts have been awarded under sub-project 3; 		

- v. Copy of 4 contract award notifications confirming that 40% of contracts have been awarded under sub-project 4;
- vi. Copy of 1 contract award notification confirming that 124% of contracts have been awarded under sub-project 5;
- vii. Technical specifications for the preparation of Local Urban Plans (Official Journal no 3545 of 3 August 2021);
- viii. Preparation and approval of local urban plans and special urban development plans (Official Journal no 3589 of 4 August 2021);
- ix. Technical Specifications for Special Urban Plans (Official Journal no 510 of 9 February 2022)
- x. Technical Specifications for Development Rights Transfer Zones (Official Journal no 3544 of 3 August 2021)
- xi. Technical Specifications Methodology Delimitation Settlements Official Journal no 3733 of 14 July 2022)
- xii. Technical specifications, criteria and conditions for the preparation of the studies to register the existing road network, per Municipal Unit in the areas outside city plans, outside the legally existing before 1923 settlements and up to 2000 houses settlements (Official Journal no 2671 of 31 May 2022)

The authorities also provided:

- i. Indicative technical data document for the Local Urban Plan of Municipality of Zakynthos;
- ii. Ministerial Decisions no ΥΠΕΝ/ΓΡΓΧΣΑΠ/74435/2992, ΥΠΕΝ/ΓΡΥΦΧΑΠ/121492/1903 and ΥΠΕΝ/ΔΠΟΛΣ/46758/1060: "Preparation and approval of local urban plans and special urban development plans parts A, B and C";
- iii. Ministerial Decisions no ΥΠΕΝ/ΓΓΧΣΑΠ/59443/10, no ΥΠΕΝ/ΓΓΧΣΑΠ/59445/11, no ΥΠΕΝ/ΓΓΧΣΑΠ/59447/12: "Preparation and approval of Parts E urban planning programmes (characterization of Municipal Roads), part D urban planning programmes (Delimitation of Settlements) and part ST urban planning programmes (Development Rights Transfer Zones)"
- iv. Ministerial Decision no ΥΠΕΝ/ΓΓΧΣΑΠ/12773/6 "Preparation and approval of local urban plans and special urban development plans - Part Z urban planning programmes"
- v. Ministerial Decision no ΥΠΕΝ/ΓΓΧΣΑΠ/16211/7 "Preparation and approval of local urban plans and special urban development plans -part H urban planning programmes.

Analysis:

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

Notification of award of 30% of all contracts (for all interventions):

- 1. preparation of Local Urban Plans;**
- 2. preparation of Special Urban Plans;**
- 3. preparation of independent plans for the definition of the Development Rights Transfer Zones;**
- 4. preparation of independent plans for the Delimitation of Settlements; and**
- 5. preparation of independent plans for the characterization of Municipal Roads.**

Local Urban Plans to include a dedicated chapter on climate change measures and prevention and management of climate related risks);

At least 30% of the contracts for all five sub-components have been awarded. The authorities submitted evidence related to the notification of awards of contracts as follows:

Sub-project 1: Preparation of Local Urban Plans. Furthermore, in line with the description of the measure, the reform consists of **the preparation of Local Urban Plans (covering municipalities or municipal units)**. The authorities submitted the technical specifications, evaluation reports, list of contractual partners and the notification of award of contracts for the preparation of Local Urban Plans. There are 69 notifications of award of contracts covering 223 Municipal Units (31.85% of the target of 700).

Sub-project 2: Preparation of Special Urban Plans. Furthermore, in line with the description of the measure, the reform consists of **the preparation of Special Urban Plans (plans that can cover areas belonging to more than one municipality)**. The authorities submitted the notification of award of 3 contracts (60% of the target of 5) for the preparation of Special Urban Plans. These cover 5 municipalities and 19 municipal units.

Sub-project 3: Preparation of independent plans for the definition of the Development Rights Transfer Zones. The authorities submitted the notification of award of contracts for 83 Municipal Units (166% of the target of 50) for the preparation of independent plans for the definition of Development Rights Transfer Zones”.

Sub-project 4: Preparation of independent plans for the Delimitation of Settlements. Furthermore, in line with the description of the measure, the reform consists of **completing the delimitation of settlements**. The authorities submitted the notification of award of contracts for 20 Municipal Units (40% of the target of 50) for the preparation of independent plans to complete the Delimitation of Settlements.

Sub-project 5: Preparation of independent plans for the characterization of Municipal Roads. Furthermore, in line with the description of the measure, the reform consists of **addressing land use issues related to recognition of (municipal) road access**. The authorities submitted the notification of award of contracts for 149 Municipal Units (124% of the target of 120) for the preparation of independent plans for characterization of Municipal Roads.

In all 78 cases, notifications of award were submitted. All award notifications were checked for the following evidence: a) names and numbers of Municipal Units covered, b) that the award decision is duly signed, c) names of contractors and d) amount of the contract and were found to be complete.

Overall, out of the 925 contracts required by the measure, 478 has been awarded. Given that this is equal to 51.68 % of the contracts required, the target of 30% for the milestone has been achieved.

Local Urban Plans to include a dedicated chapter on climate change measures and prevention and management of climate related risks

The authorities submitted the technical specifications and their amendments for all five-sub-components. The relevant parts of the technical specifications were verified and were found to be aligned with the description of the milestone and the description of the measure in the CID. The CID requires the inclusion of a dedicated chapter on climate change measures and prevention and management of climate related risks in the Local Urban Plans. This is ensured through the technical specifications for the Local Urban Plans of the relevant chapter on climate change, which can be found in page 47635 of the Official Journal no 3545 of 3 August 2021 (evidence no vii). In particular, in Chapter 7 of the Plans:

Chapter 7: Climate Change Adaptation Planning and Emergency Response

- Climate change adaptation measures;

- Integration of urban planning maps into operational emergency response plans;
- Disaster prevention and response infrastructure and interventions;
- Free spaces and water surfaces;
- Measures and proposals to make use of the LUPs at a post-destructive level.

In addition, references to problem identification and actions related to both climate change measures and prevention and management of climate related risks which are to be covered in the Local Urban Plans are found throughout the technical specifications submitted in evidence vii (e.g. General Guidelines, page 47612; Chapter P4: Planning for adaptation to climate change and contingency plans, page 47611; Map A7 Geographical physiology and climate – climate change, page 47617; requirements for spatial details of the Regional Adaptation Plan for climate Change, page 47631; plans with zones (areas) related to adaptation measures to climate change as defined in the LUPs, page 47634; etc. The specifications apply to all contracts.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 43	Related Measure: Recharge and refuel – Framework for installation and operation of EV charging infrastructure (Measure ID: 16281)		
Name of the Target: Charging points for electric vehicles – local plans approved			
Quantitative Indicator: Number of plans adopted by the Ministry of Environment and Energy	Baseline: 0	Goal: 300	Time: Q4 2022
<p>Context:</p> <p>This reform aims to establish a comprehensive regulatory framework for the installation and operation of charging points for electric vehicles. The reform shall aid Greece towards the path to meet the NECP target of a 30% share of electric vehicles in the domestic market by 2030. By the end of 2022, the Ministry of Environment and Energy shall adopt at least 300 plans submitted by local authorities for the installation of publicly available electric vehicle charging points.</p> <p>Target 43 requires the successful adoption by the Ministry of Environment and Energy of at least 300 plans submitted by local authorities for the installation of publicly available electric charging points.</p> <p>Target 43 is the second and last target of this reform, and it follows the completion of milestone 42, relating to the entry into force of Ministerial Decisions (MDs) provisioned in law 4710/2020. The MDs entail organising the electric vehicles’ market, with focus on the charging services and provides tax-based incentives for the purchasing of electric vehicles and the installation of charging infrastructure for electric vehicles.</p>			
<p>Evidence Provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ul style="list-style-type: none"> ii. A summary document duly justifying how the milestone was satisfactorily fulfilled. iii. As an annex to the summary document: A report by the Ministry of Environment and Energy containing official references to the acts adopting 311 plans adopted by local authorities. 			

On the basis of the report containing the 311 local plans, the following documentary evidence for each of the local Charging Plans was requested:

- i. A list of unique identification numbers, each representing one of the 311 local plans for the installation of publicly accessible charging stations adopted by the respective municipality
- ii. A randomly selected sample of 60 municipalities was drawn, for which EL submitted the decision taken by the municipality when adopting their local plan.

Analysis:

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

Adoption by the Ministry of Environment and Energy of at least 300 plans submitted by local authorities for the installation of publicly available electric vehicle charging points

The charging plan of each municipality is approved by the “Life Quality Committee”, or if such a committee does not exist, by another competent committee of the municipality.

The summary document contains a report/table setting out details for the 311 local plans that have been adopted by municipalities, as follows:

- The table includes a unique identification number, which was assigned when the adoption decision taken by respective municipality was uploaded on the public platform (diavgeia.gov.gr). This platform is set up in order to ensure transparency and to consolidate responsibility and accountability on the part of Greek public authorities and citizens can here access all decisions taken by public sector entities.
- The table contains details regarding when the E-mobility office (part of the Ministry of Environment and Energy) sent an email to each municipality confirming correct submission of their respective local plan for the installation of publicly available electric vehicle charging points. These local plans contain various details, examples include but are not limited to; intervention frameworks, conditions, methods of charging, sitting strategies, institutional frameworks, cost/benefit analyses and proposed provisions.

The decisions adopting the local plans were taken by the local authority (i.e. municipality) instead of by the Ministry of Environment and Energy. The adoption by the municipalities is necessary and deemed sufficient, since it will be the municipalities that will be responsible for the implementation of the adopted plans. Therefore, the decision to adopt the plan by the municipality is seen an adequate and equal procedure to the adoption decision made by the Ministry of Environment and Energy. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the adoption of the plans is related to the internal procedures of the Member State. As of this, the minimal deviation does not change the nature of the measure and does not affect the progress towards the achievement of the reform that the target represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

The evidence provided for a sample of 60 units confirmed that the municipalities adopted the respective plans and thereby that the requirements of the milestone have been met.

The check of the sample by the Commission on 23 March 2023 confirmed the validity of the information provided by the authorities. Specifically, for each of the decisions within the sample, the unique identification number and the respective municipality were cross-referenced to the annexed report provided by the Ministry, containing the 311 decisions. In addition, the content of the decisions

was checked to ensure that they indeed provide for the adoption of the municipal electric vehicle charging plans.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 45	Related Measure: Recharge and refuel – Electromobility (Measure ID: 16924)
Name of the Milestone: Public transport – implementation of new market regulation for Public Service Obligation (buses)	
Qualitative Indicator: Entry into force of secondary legislation related to revised legal framework.	Time: Q3 2022
<p>Context:</p> <p>The aim of this investment is to address e-mobility in line with the objectives of Greece’s National Energy and Climate Plan (NECP). The investment encompasses: i) the support for the installation of publicly accessible charging points in key urban and suburban locations and points of interest; ii) the replacement of older buses with 220 new electric ones; iii) incentivise the replacement of older taxi’s with 2,000 battery electric vehicles; iv) a reform of legislation for public service obligations for bus companies in line with the current EU acquis; and v) to undertake a feasibility study to set up an e-Transport Agency.</p> <p>Milestone #45 concerns the entry into force of secondary legislation indicated in the revised legal framework to strengthen market regulation for public urban and regional passenger transportation services.</p> <p>Milestone #45 is the second milestone of this measure, and it follows the completion of milestone #44, related to the strengthening of market regulation through entry into force of a revised legislative framework for public urban and regional passenger transportation services (“Provisions for the public interurban and urban routine passengers’ road transport. Organisational reform of OSE S.A. and ERGOSE S.A. and other provisions” was adopted on 29 September 2022). The adopted primary law constituted the main deliverable for Milestone 44 (part of the 2nd payment request and assessed as ‘satisfactory fulfilled’).</p> <p>Milestone #45 will be followed by other milestones related to this measure: milestone #47 (due in Q4 2022), milestone #48 (due in Q4 2022), milestone #49 (due in Q4 2023), target #52 (due in Q4 2024) and target #55 (due in Q4 2025). These milestones and targets are related to other subprojects of this measure including 1) support for the installation of publicly accessible charge points in key urban and suburban locations and points of interest (such as airports, motorways, ports and in parking areas); 2) the replacement of older buses with 220 new electric ones; 3) incentives for the replacement of older taxis with 2,000 battery electric vehicles; and 4) undertaking a feasibility study to set up an e-Transport Agency that shall ensure appropriate planning and coordination between transport and energy infrastructures, regional and local governments and other stakeholders in the research and private sector. The implementation of the investment shall be completed by Q4 2025.</p>	
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p>	

- i. Copy of the publication in the Official Journal for the secondary legislation that is indicated in the revised legal framework (Law 4974/2022, OJ A/185/29.09.2022, “Provisions for the public interurban and urban routine passengers’ road transport. Organisational reform of OSE S.A. and ERGOSE S.A. and other provisions”, Milestone 44 that was assessed as satisfactory fulfilled as part of the 2nd payment request) to strengthen market regulation for public urban and regional passenger transportation services. Article 29 of Law 5058/2023, Defining geographic areas and networks of regular long-distance and urban lines public road passenger transport, Amendment of Article 11 of Law 4974/2022 (OJ A/170/23.10.2023).
- ii. Ministerial Decision No 151442 (par. 1 of Article 30 of Law 4974/2022) “Laying down the rules and criteria for the design of the network for regular long-distance and urban road passenger transport, as well as the minimum requirements to be met by the competent regional units or regions of Greece for the provision of regular long-distance and urban passenger transport services by the competent regional units or regions.” Article 5 confirms entry of force on the date of publication in the OJ (i.e. 12 May 2023). (OJ B 3164/12.05.2023).
- iii. Ministerial Decision No 324237 (par. 2 and 3 of Article 11 and par. 2 of Article 30 of Law 4974/2022) “Determining the geographical areas and networks of the regular long-distance and urban lines of public road passenger transport (OJ B 6246/31.10.2023).
- iv. Ministerial Decision No. 148169 (par. 3 of Article 30 of Law 4974/2022) “Laying down the technical specifications for the establishment and operation of parking, maintenance and storage depots for urban or semi-urban buses.” Article 14 confirms entry of force on the date of publication in the OJ (i.e. 10 May 2023). (OJ B 3120/10.5.2023).
- v. Ministerial Decision No. 146177 (par. 6 of Article 30 of Law 4974/2022) “Laying down rules for monitoring the execution by contractors of contracts for the performance of regular long-distance and urban passenger transport by road, for passenger satisfaction surveys, and for research and identification of the quality parameters of the transport services offered.” Article 7 confirms entry of force on the date of publication in the OJ (i.e. 9 May 2023). (OJ B 3080/9.5.2023)
- vi. Joint Ministerial Decision No. 150717 (par. 7 of Article 30 of Law 4974/2022) “Establishment of a procedure for establishing a breach of contractual obligations and the obligations arising from Law 4974/2022 (A' 185) and Regulation (EC) 1370/2007 of the contractors, as well as specification of the relevant administrative fines”. Article 5 confirms entry of force on the date of publication in the OJ (i.e. 11 May 2023). (OJ B 3128/11.05.2023)
- vii. Ministerial Decision No. 150801 (par. 10 of Article 30 of Law 4974/2022) “Content of a proposal file for the execution of a new regular long-distance or urban passenger transport line, as well as the procedure for establishing and operating a new regular long-distance or urban passenger transport line”. Article 4 confirms entry of force on the date of publication in the OJ (i.e. 11 May 2023). (OJ B 3128/11.05.2023)
- viii. Decisions of regional governors for the “Determination of specifications for stops and passenger shelters” (pursuant to paragraph 4 of article 30 of Law 4974/2022, OJ A 185/29.09.2022) for each of Greece’s 13 regional administrations:
 - Decision of Mainland (Sterea) Greece regional governor-ΑΔΑ: PY3Ω7ΛΗ-8ΨΡ and Ref. no 84854. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 26 April 2023);
 - Decision of Thessaly regional governor-ΑΔΑ: 6ΑΒΥ7ΛΡ-14Φ and Ref. no 179035. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 4 May 2023);

- Decision of Ionian Islands regional governor-ΑΔΑ: 6ΑΑΖ7ΛΕ-ΤΦ5 and Ref. no 38024/7334. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 5 May 2023);
 - Decision of Eastern Macedonia and Thrace regional governor-ΑΔΑ: 6ΞΝ57ΛΒ-ΧΛΡ and Ref. no 122689/340. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 25 April 2023);
 - Decision of Epirus regional governor-ΑΔΑ: 6Ι8Β7Λ9-ΔΕΔ and Ref. no 66024/9597. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 27 April 2023);
 - Decision of Southern Aegean regional governor-ΑΔΑ: 6ΕΓΗ7ΛΞ-ΞΝΕ and Ref. no 13462. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 5 May 2023);
 - Decision of Western Macedonia regional governor-ΑΔΑ: 9Ψ927ΛΨ-Ζ4Χ and Ref. no 67816. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 26 April 2023);
 - Decision of Western Greece regional governor Ref. no: ΠΔΕ/ΓΔΜΕ/139177/230. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 4 May 2023);
 - Decision of Peloponnesus regional governor-ΑΔΑ: ΨΩΣΘ7Λ1-ΤΗ5 and Ref. no 136110. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 25 April 2023);
 - Decision of Crete regional governor- ΑΔΑ: 6ΕΤ87ΛΚ-ΚΧΣ and Ref. no 142601. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 5 May 2023);
 - Decision of Central Macedonia regional governor – ΑΔΑ: ΨΟ8Η7ΛΛ-ΕΝΡ and Ref. no. 311636(343). The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 8 May 2023);
 - Decision of Attica regional governor – ΑΔΑ: 6Β977Λ7-ΞΟ8 and Ref. no. 568469. The decision entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 11 May 2023)
 - Decision of North Aegean regional governor – Ref. no 68234. The entered into force on the date of its publication on the public website portal (diavgeia.gr) (i.e. 11 May 2023);
- ix. A supporting document duly justifying how the milestone was satisfactorily fulfilled.

Analysis:

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

Entry into force of secondary legislation indicated in the revised legal framework to strengthen market regulation for public urban and regional passenger transportation services

To complete the legal framework, Article 30 of Law 4974/2022 provides for the enactment of secondary legislation to regulate specific matters, matters of local interest, and of a technical and detailed nature. In this context, the authorities have adopted the following secondary acts indicated in the revised legal framework to strengthen the market regulation for public urban and regional passenger transportation services:

- *Ministerial Decision on the details for the design of the network for regular long-distance and urban road passenger transport has been issued, Article 30 (paragraph 1) of Law 4974/2022 (OJ B 3164/12.05.2023):* this act sets out the specific rules and criteria according to which the design of the regular long-distance and urban road passenger transport network by the competent local authorities shall take place, the minimum requirements met at execution of public regular long-distance and urban passenger transport services, the criteria that are taken into account for the determination of the minimum mandatory routes on each long-distance and urban road passenger transport line, as well as the criteria for determining the execution time of each route, so that all categories of the passenger public are served as much as possible. In articles 2, 3 and 4 of this Ministerial Decision, the relevant terms and conditions are defined both for the lines that are characterised as economically viable (i.e. the lines that cover their operating costs/execution costs with a reasonable profit), as well as for the lines that they are not economically viable (i.e. the “barren” ones) that would be entitled to support through public service obligation.
- *Ministerial Decision on the determination of the geographical areas and networks of the regular long-distance and urban lines of public road passenger transport for each regional administration, Article 11 (paragraphs 2 and 3) and Article 30 (paragraph 2) of Law 4974/2022:* the act, in accordance with the amended Article 11 (Article 29 of Law 5058/2023), was adopted by the competent authority (i.e. Ministry of Infrastructure and Transport) for the bus network foreseen for each of the geographical areas. The lines that make up each network will then be the subject of separate tender procedures or direct assignment, provided for under Law 4974/2022.
- *Ministerial Decision on the technical specifications for the establishment and operation of parking, maintenance and storage depots for urban or semi-urban buses, Article 30 (paragraph 3) of Law 4974/2022 (OJ B 3120/10.5.2023):* this act complements the existing provisions (Presidential Decree 79/2004), which set out the specifications for the establishment and operation of bus terminals.
- *Regional Governors’ decisions on the technical specification for bus stops and passenger shelters, Article 30 (paragraph 4) of Law 4974/2022:* this act is provided for in Article 13 of Law 4974/2022 that sets out general provisions relating to bus stops and passenger shelters.
- *Ministerial Decision defining the rules for monitoring the execution by contractors of contracts for the performance of regular long-distance and urban passenger transport by road, Article 30 (paragraph 6) of Law 4974/2022 (OJ B 3080/9.5.2023):* this act is provided for in Article 22 of Law 4974/2022 that sets out general provisions relating to the monitoring of the execution of contracts.
- *Joint Ministerial Decision defining the procedure for determining a breach of contractual obligations and the specification of the relevant administrative fines pursuant, Article 30 (paragraph 7) of Law 4974/2022 (OJ B 3128/11.05.2023):* this act is provided for in Article 22 of Law 4974/2022 that sets out general provisions relating to the monitoring of the execution of contracts and Article 23 of Law 4974/2022 that sets out general provisions on administrative fines.
- *Ministerial Decision defining the content of a proposal file for the execution of a new regular long-distance or urban passenger transport line, Article 30 (paragraph 10, point a) of Law 4974/2022 (OJ B 3128/11.05.2023):* this act sets out the procedure for establishing and operating a new regular long-distance or urban passenger transport lines for which no exclusive right of exploitation or exclusive right of exploitation and right of compensation has

been granted, following a tender process or by a direct award process, is provided for in Article 27 of Law 4974/2022.

The same enabling provision of Law 4974/2022 (i.e. Article 30, paragraph 10, points b and c) also refers to the establishment of new line(s) proposed as well as to the specifications of those new lines (e.g. bus stops and route). The provision allows the competent authority (i.e. Ministry of Infrastructure and Transport) to establish, via secondary legislation, new bus lines upon reception of a proposal by the regional administrations. Given that no proposals have been submitted to date, such secondary legislation has not yet been adopted.

It is noted that Article 30 of Law 4974/2022, which sets out the enabling mandate for secondary acts to be adopted, refers to three optional acts that may be adopted. The non-mandatory secondary acts falling into this category are:

- Article 30, paragraph 5, Law 4974/2022: concerns the option to proceed with grouping of the tenders, provided for in Article 14 of Law 4974/2022 that sets out provisions on the tender process;
- Article 30, paragraph 8, Law 4974/2022: concerns bus services foreseen in case there is an interruption of the regular transport services, provided for in Article 24 of Law 4974/2022 that sets out provisions on ensuring continuous supply of regular intercity and urban road passenger transport; and
- Article 30, paragraph 9, Law 4974/2022: concerns the option for the competent authority to directly assign bus services to third parties due to restricted transport services, provided for in Article 25 of Law 4974/2022 that sets out conditions for the direct assignment of limited/temporary transport services.

Despite these acts of secondary legislation being optional and therefore the requirement from the milestone of secondary legislation being in place being literally met, it is noted that the policy purpose of this provision has also been met as all secondary legislation that is necessary to operationalise the requirements of the milestone is in place.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 46	Related Measure: Recharge and refuel – Produc-E Green (Measure ID: 16831)	
Name of the Milestone: Industrial Units– launch of programme		
Qualitative Indicator: Entry into force of Ministerial Decision(s).		Time: Q4 2022
<p>Context:</p> <p>The objective of this investment is to implement two projects that aim to contribute to the low carbon economy and resilience to climate change. The first project shall provide support for the development of more than ten sites with R&D departments for innovative products or services (such as, the recycling of electric car batteries). The second project shall provide support to the development of the first CO2 storage facility in Greece. Both projects must comply with the Do No Significant Harm (DNSH) principle, and the first project shall contain in the eligibility criteria for the call an exclusion list of activities that cannot be performed.</p>		

Milestone 46 concerns the launch of a programme for the selection of industrial units and the entry into force of the relevant Ministerial Decision(s) by the Ministry of Environment and Energy setting out: i) the selection process to target low carbon economy and resilience to climate change; ii) a defined implementation mechanism; iii) a certification mechanism to validate that climate change objective is met (including possible corrective actions if needed) and iv) the timeline. Selection/eligibility criteria shall ensure that the selected projects comply with the DNSH principle through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation.

Milestone 46 is the first step of the implementation of the investment, and it will be followed by milestone 50 (due in Q4 2023), related to the notification of award by the Ministry of Environment and Energy of approved applications, and milestone 51 (due in Q2 2024), related to the carbon capture and storage facility. The investment has a final expected date for implementation in Q4 2025.

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Copy of the publication in the Official Journal of Law 5027/2023 (Official Journal A 48/03.03.2023)), which, among other provisions, announces the Produc-E Green measure, establishes the Ministry of Environment and Energy as the implementing body and leaves to a separate Joint Ministerial Decision the definition of the specific requirements for the program. Article 96 of the Law sets out that this secondary legislation enters into force on the date of its publication in the Official Journal.
- iii. Copy of the publication in the Official Journal for the required secondary legislation (Joint Ministerial Decision by the Ministry of Economic Development and Investment, the Minister of Environment and Energy and the Minister of Finance ΥΠΕΝ/ΥΔΕΝ/52385/774 (Official Journal B 3156/12.05.2023, “Call for Action entitled Productive Green Economy Investments Produc-E Green, which will be implemented with the support of the Recovery and Resilience Fund”). Article 32 of the Joint Ministerial Decision sets out that this secondary legislation enters into force on the date of its publication in the Official Journal.

Analysis:

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

Launch of programme for selection of industrial units and entry into force of relevant Ministerial Decision(s) by the Ministry of Environment and Energy

Law 5027/2023 (Official Journal A 48/03.03.2023), entered into force on the date of its publication in the Official Journal (3 March 2023), as set out in article 96, it announced the launch of the Produc-E Green programme, specifying that a public call to launch the programme, including the details and conditions of the programme would be issued by a subsequent Ministerial Decision. The Joint Ministerial Decision ΥΠΕΝ/ΥΔΕΝ/52385/774, which, according to its Article 32, entered into force on the date of its publication in the Official Journal (12 May 2023), launched the programme for the selection of industrial units to be supported, in accordance with the requirement of the milestone, Article 1 of the Joint Ministerial Decision defines the objective of the action in line with the

description of the measure in the CID (that is, to provide support for the development of production sites in the field of green industry, with emphasis on the productive sector of electromobility, renewable energy sources as well as products and goods intended for energy saving). The same Article 1 also mentions that the selected industrial plants in the field of sustainable mobility (such as, recycling of electric car batteries by reusing raw materials such as lithium and cobalt, design of electric vehicles and normal or high-power charging points) that receive support must be fully operational together with a dedicated research and development (R&D) department for innovative products/services, in line with the description of the measure.

The programme sets out:

i) Selection process to target low carbon economy and resilience to climate change

In line with the description of the milestone, the application/selection process is described in Articles 14, 15, 16, 17, 18, 19 and 20 of the Joint Ministerial Decision. These articles outline the eligible beneficiaries, application submission procedure and how the applications are verified, assessed and evaluated. Regarding the selection process to target low carbon economy and resilience to climate change, eligible investments are described in article 7. The article outlines that this scheme applies to investment projects falling within the manufacturing sector and that are included in the Activity Code Numbers of the National Classification of Economic Activities (NACE), as reflected in Annex I to the Joint Ministerial Decision. Annex I lists the eligible sectors targeted by the programme, which are all related to renewables, energy efficiency and e-mobility, and therefore compatible with addressing the low carbon economy and resilience to climate change. To further reinforce this, article 6 of the Joint Ministerial Decision defines the rules under which investments are considered as non-eligible, which excludes polluting activities according to the “Do No Significant Harm” principle.

ii) Implementation mechanism defined

The definition of the implementation mechanism required by the milestone is outlined in Articles 2, 3, 4, 16 and 21, 22, 23 and 24. A dedicated website has been setup (Article 16) at <https://produceegreen.gov.gr>, addressed to receive and manage the applications and store the relevant required files. The implementing and supervising body is the National Strategic Reference Framework (NSRF) Staff Structure – Energy Sector of the Ministry of Environment and Energy (YPEN) (Article 2). Article 4 sets out the financing of the programme, and the monitoring process during the implementation period is described in articles 21, 22, 23, 24.

iii) Certification mechanism(s) to validate that climate change objective is met (incl. details of possible corrective actions, if needed)

Sub-articles 21.5, 21.6 and 21.8 of the Ministerial Decision outline the certification mechanism to validate that the climate change objective is met, in line with the description of the milestone. It establishes the monitoring procedure of the implementation of aid applications through certifying that the physical and financial objective of the application for payment of the aid has been properly implemented in accordance with the provisions of the approval decision and national legislation relating to the expenditure of the application for payment of the aid and funding. Additionally, it outlines that an audit team shall be appointed for verifying the content and nature of the investment, therefore certifying that these are in the areas established under Annex I of the Joint Ministerial Decision. As such, the outlined certification mechanism ensures and validates that the climate change objective is met. On the basis of the results of the final certification report (among others), produced by the audit team, the implementing body issues the certificate of completion, which is a condition

for disbursing the total amount to the beneficiary. The issuance of a negative report would not allow for the final disbursement, constituting an eventual corrective action of the certification mechanism.

iv) Timeline

Lastly, the timeline is described in Article 1 and 4 of the Joint Ministerial Decision, where the start of the application period is set from 30 May 2023 until 30 November 2023. The final date for applying for payments through this scheme is set on 30 June 2025. Under Article 5, the completion timeline for the investments is given and is set at 18 months with the possibility of an extension of six months eligible under special evaluation.

Selection/eligibility criteria set shall ensure that the selected projects comply with the Do No Significant Harm Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation.

Concerning the DNSH requirements set out in the Council Implementing Decision, in Article 3 of the Joint Ministerial Decision it is stated that investments shall comply with the ‘Do No Significant Harm’ principle. Specifically, Annex IX contains a responsibility statement (declaration of honour) template under Law 1599/1986 to be included with the relevant paperwork that is required for the application for any investment. The statement provides that the applicant declares and takes responsibility that the investment complies with EU and national environmental legislation and with the “Do No Significant Harm” principle. An extended checklist is provided to be submitted along with the other necessary documents for the application.

Further, the Joint Ministerial Decision (article 6 on the excluded activities) indicates that the measures to be financed shall comply with the ‘Do No Significant Harm’ principle, and sets out the exclusion list for the activities mentioned in the description of the measure in the Council Implementing Decision.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 47	Related Measure: Recharge and refuel – Electromobility (Measure ID: 16924)	
Name of the Milestone: Electric vehicles charging points – launch of programmes		
Qualitative Indicator: Entry into force of Ministerial Decision(s).		Time: Q4 2022
Context:		
<p>The aim of this investment is to address e-mobility in line with the objectives of the National Energy and Climate Plan (NECP). The investment encompasses: i) the support for the installation of publicly accessible charging points in key urban and suburban locations and points of interest; ii) the replacement of older buses with 220 new electric ones; iii) incentivise the replacement of older taxis with 2,000 battery electric vehicles; iv) a reform of the legislation for public service obligations for bus companies in line with the current EU acquis; and v) to undertake a feasibility study to set up an e-Transport Agency. The investment component replacing old buses and vehicles shall be compliant with the DNSH principle.</p> <p>Milestone 47 concerns the launch of the programme for the selection of more than 8,000 publicly accessible charging points for electric vehicles at strategic urban and suburban locations within cities and points of interest, and the entry into force of the relevant Ministerial Decision(s) by the Ministry</p>		

of Environment and Energy setting out: i) selection process; ii) defined implementation mechanism; iii) certification mechanism to validate that climate change objectives are met; iv) a timeline.

Milestone 47 is the third milestone of the investment, and it follows the completion of milestone 44 and milestone 45, related to the reform of legislation for public service obligations. Milestone 47 will be followed by milestone 48 (due in Q4 2022), milestone 49 (due in Q4 2023), target 52 (due in Q4 2024) and target 55 (due in Q4 2025), which relates to the completion of at least 8,000 publicly accessible charging points for electric vehicles. The implementation of the investment shall be completed by Q4 2025.

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Copy of the publication in the Official Journal of the Joint Ministerial Decision by the Ministry of Economic Development and Investment, the Minister of Environment and Energy and the Minister of Transport ΥΠΕΝ/ΑΤΗ/49144/468 (Official Journal Β' 2966/05.05.2023, "Announcement of "CHARGE EVERYWHERE", which will be implemented with the support of the Recovery and Resilience Fund"). Article 23 of the Joint Ministerial Decision sets out that this secondary legislation enters into force on the date of its publication in the Official Journal.

Analysis:

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

Launch of programme for selection of more than 8 000 publicly accessible charge points for electric vehicles at strategic urban and suburban locations within cities and at points of interest ("Electromobility")

The issuance of the Joint Ministerial Decision ΥΠΕΝ/ΑΤΗ/49144/468, which entered into force on the date of its publication in the Official Journal (05 May 2023), fulfils the requirement of milestone 47 by launching the programme for the selection of 8,000 publicly accessible charging points (as specified in the preamble). Article 1 and 3 of the Joint Ministerial Decision define the scope of work as described in measure 16924 (that is, the selection and installation of 8,000 charging points for electric vehicles at strategic urban and suburban locations within cities and points of interest, such as airports, motorways, ports and parking lots).

Entry into force of relevant Ministerial Decision(s) by the Ministry of Environment and Energy setting out: - Selection process; - Implementation mechanism defined; - Certification mechanism(s) to validate that climate change objective is met (incl. details of possible corrective actions, if needed; and – Timeline

As required by the description of the milestone, the Joint Ministerial Decision, which entered into force on the date of its publication in the Official Journal (05 May 2023), sets out:

- i) **Selection process**

In line with the description of the milestone, the application/selection process is described in Articles 13, 14 and 15 of the Joint Ministerial Decision. The articles outline the application submission procedure and how the applications are assessed and evaluated.

ii) Defined implementation mechanism:

Article 10 of the Joint Ministerial Decision defines and outlines the implementation mechanism for the recognition of expenses of the installed chargers. The article identifies the maximum eligible budget per loading station by category of expenditure, in addition to describing the various categories of eligible costs and ineligible costs.

iii) Certification mechanism to validate that climate change objectives are met (including details of possible corrective actions, if needed):

Article 20 outlines the certification mechanism to validate that climate change objective is met, in line with the description of the milestone. It establishes the terms and obligations of stakeholders for the supply of supported charging stations with energy produced from renewable energy sources. The beneficiary is obliged to ensure the supply of energy produced from RES to the charging stations, in accordance with the applicable legislation on the production and use of energy from RES. The beneficiary is in fact obliged to prove the origin of the RES supply by withdrawing Guarantees of Origin, which constitutes the proof that the electricity has been produced using renewable energy sources (and that the climate change objective is met). As a potential corrective action, as part of its responsibilities for checking the use of guarantees of origin, the Renewable Energy Sources Operator and Guarantees of Origin (DAPEEP S.A.) may instruct a certification body to check the measuring devices and the data that prove that the energy consumption come from RES and that guarantees of origin are withdrawn.

iv) Timeline

Lastly, the timeline is described in Article 9 of the Joint Ministerial Decision, where the start of the application period is set from 11 May 2023 until 31 December 2023 (or until all funding is allocated to the potential beneficiaries, whichever occurs first). The final completion date for the installation of publicly accessible charging points receiving grants through this scheme is set for 31 October 2025.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 48	Related Measure: Recharge and refuel – Electromobility (Measure ID: 16924)	
Name of the Milestone: Sustainable transport – feasibility study		
Qualitative Indicator: Entry into force of a Joint Ministerial Decision adopting the Feasibility Study for an eMobility Agency.		Time: Q4 2022
Context:		
<p>The aim of this investment is to address e-mobility in line with the objectives of the NECPs. The investment requires, among others, to undertake a feasibility study to set up an e-Transport Agency.</p> <p>Milestone 48 requires entry into force of a Joint Ministerial Decision adopting a feasibility study for the establishment of an electro-mobility agency that ensures appropriate planning and coordination between transport and energy infrastructures, regional and local governments, and promote</p>		

linkages between the e-supply chain – including battery and RES producers – with the research and innovation base.

Milestone 48 is the fourth milestone of the investment, and it follows the completion of milestone 44 (part of the 2nd payment request) and milestones 45 and 47, which are part of the current (3rd) payment request and related to the entry into force of the revised legal framework for public urban and regional passenger transportation services (Milestone 44), the entry into force of secondary legislation indicated in the revised legal framework (Milestone 45) and the entry into force of the Ministerial Decision setting out the i) selection process; ii) defined implementation mechanism; iii) certification mechanism to validate that climate change objectives are met; iv) a timeline for the programme of selection of publicly accessible charge points (Milestone 47). It will be followed by milestone 49 (due in Q4 2023), target 52 (due in Q4 2024) and target 55 (due in Q4 2025), out of which milestone 49 and target 55 relate to the completion of at least 8,000 publicly accessible charging points for electric vehicles. The implementation of the investment shall be completed by Q4 2025.

Evidence provided:

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

- i. A summary document, including in annex an explanatory report and a link to the website where the feasibility study can be accessed, duly justifying how the milestone was satisfactorily fulfilled.
- ii. Copy of the publication in the Official Journal for the secondary legislation, OJ B 2014/30.03.2023, which adopts the feasibility study (included as an annex of the Joint Ministerial Decision. Article 3 confirms entry of force on the date of publication in the OJ (i.e. 30 March 2023).
- iii. Copy of the enabling primary law provision, “Integrated Palliative Care Delivery System – provisions to cope of the COVID-19 coronavirus pandemic and public health protection and other urgent provisions, Article 123 of Law 5007/2022, OJ A 241/23.12.2022. Article 129 confirms entry of force on the date of publication in the OJ (i.e. 23 December 2022).

Analysis:

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

Entry into force of a Joint Ministerial Decision adopting a feasibility study for the establishment of an electro-mobility agency

A Joint Ministerial Decision of the Minister of Infrastructure and Transportation and the Minister of the Environment and Energy was published in the Official Journal on 30 March 2023 (OJ B 2014/30.03.2023) and entered into force the day of its publication. The feasibility study is annexed to that Decision and constitutes an integral part of it.

The feasibility study contains different chapters, each of which analyses and describes the feasibility of different options for the establishment of a national electromobility agency (NEA) in Greece.

Feasibility study for the establishment of an electro-mobility agency that shall ensure appropriate planning and coordination between transport and energy infrastructures, regional and local

governments, and promote linkages between the e-Supply chain -including battery and RES producers - with the research and innovation base

In line with the description of the milestone, the feasibility study elaborates on the appropriate set-up of an electro-mobility agency that must ensure the planning and coordination between transport and energy infrastructures, regional and local governments, and promotes linkages between the e-supply chain – including battery and RES producers – with the research and innovation base. Specifically, the assurance of appropriate planning and coordination between transport and energy infrastructures is elaborated in chapter 5 of the feasibility study. The planning and coordination between regional and local governments is among the responsibilities of the NEA and, more specifically, the coordination of recharging (and refuelling) infrastructure planning with regional and local governments is referred to in section 5.2 of the feasibility study. Lastly, the promotion of linkages between the e-supply chain – including battery and renewable energy sources (RES) producers – with the research and innovation base is ensured by activities presented in section 5.3.6 “Activities in the area of Research and innovation” as well as in section 3.7 “Research and innovation base”).

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 57	Related Measure: Sustainable use of resources, climate resilience and environmental protection – Waste management law for the implementation of sustainable landfilling and recycling (Measure ID: 16772)	
Name of the Milestone: Entry into force of waste management regulator law		
Qualitative Indicator: Entry into force of legislation		Time: Q3 2022
<p>Context:</p> <p>The measure aims at promoting the green transition, including through the waste management reform and the establishment of a waste regulator that will support the transition towards a circular economy based on waste prevention, reuse and recycling, by enforcing waste management standards and regulations and by acting if these standards and regulations are not met. The waste regulator is expected inter alia to be responsible for ensuring the soundness of the pricing policy, supervision of waste management implementation across the country, and supervision of the proper functioning of the regional and local waste management utilities.</p> <p>Milestone 57 requires the entry into force of a law to:</p> <ul style="list-style-type: none"> i) set-up a national waste regulatory authority, its operation and its responsibilities; ii) reform the regional and local waste management bodies (FODSA); and iii) introduce sound costing and pricing policies in line with “pay as you throw” and “polluter pays” principles. <p>Milestone 57 is the second milestone of the reform, and it follows the completion of milestone 56 related to the entry into force of a waste management law. It will be followed by milestone 59 related to the set-up and functioning of the waste regulatory authority. The reform has a final expected date for implementation on 30 June 2023.</p>		

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Law 5037/2023 on “Renaming of the Energy Regulatory Authority to Waste, Energy and Water Regulatory Authority and expansion of its operations by including responsibilities over water and waste management, strengthening of water policy”, published in the Official Journal A 78 of 28 March 2023 and entered into force on that date.
- iii. Law 5043/2023 on “Arrangements relating to Local Authorities of first and second degree - Provisions for the welfare of companion animals - Provisions for public sector human resources - Other regulations of the Ministry of Interior and other urgent provisions”, published in the Official Journal A 91 of 13 April 2023 and entered into force on that date.
- iv. Law 4954/2022 on “Additional measures for the implementation of the Regulation (EU) 2019/788 of the European Parliament and of the Council on European citizens' initiative and Commission Implementing Regulation (EU) 2019/1799 laying down technical specifications for individual online systems concentration - Provisions relating to the electoral procedure and the control of revenue and expenditure of parties, coalitions and candidates for deputies and elected representatives - Other urgency Provisions”, including in Articles 31 to 40 thereof “Organisational arrangements and Local Authorities' responsibilities in waste management”, published in the Official Journal A 136 of 9 July 2022 and entered into force on that date.
- v. Joint Ministerial Decision of the Minister of Environment and Energy, and the Alternate Minister of Interior, No. 52866/451 of 12 May 2023, on the “Establishment of criteria for the evaluation of the management capacity of water service providers and solid waste management bodies, as well as the minimum levels of their fulfilment in application of Article 12 of the Law 5037/2023, which is adding Article 12B to the Law 4001/2011”, published in the Official Journal B 3309 of 18 May 2023 and entered into force on that date.
- vi. Joint Ministerial Decision of the Minister of Environment and Energy, and the Alternate Minister of Interior, No. 52977/775 of 12 May 2023, on the “Regulation of Invoicing of the Solid Waste Management Bodies (FODSA)”, published in the Official Journal B 3203 of 15 May 2023 and entered into force on that date.
- vii. Joint Ministerial Decision of the Minister of Environment and Energy, and the Alternate Minister of Interior, No. 52977/775 of 14 December 2021, on the “Structure and the minimum content of the Cleaning Regulation of the Local Authorities”, published in the Official Journal B 5888 of 15 December 2021 and entered into force on that date.
- viii. Act of the Council of Ministers, No. 31 of 27 September 2022, on the public recruitment planning for year 2023.
- ix. Law 4685/2020 on the “Modernisation of environmental legislation, transposition into Greek legislation of the Directives 2018/844 and 2019/692 of the European Parliament and of the Council, and other provisions”, published in the Official Journal A 92 of 7 May 2020 and entered into force on that date.
- x. Law 4873/2021 published in the Official Journal A 248 of 16 December 2021, on the “Protection of volunteering, strengthening of the action of Civil Society, tax incentives to strengthen the charitable action of Civil Society Organisations, and other provisions”.

The authorities also provided:

- xi. Law 4819/2021 published in the Official Journal A 129 of 23 July 2021, on the “Integrated framework for waste management – Transposition of Directives 2018/851 and 2018/852 of the European Parliament and the Council of 30 May 2018 amending Directive 2008/98/EC on waste”
- xii. Call for proposals No. 7954 launched by the Ministry of Development and Investment on 12 July 2022 for “Pilot Actions for the Management of Separate Collection of Municipal Waste in Municipalities of the Country – Pay as you throw – Gain as you sort”.

Analysis:

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

Entry into force of a law to set up a National Waste Regulatory Authority, its operation and its responsibilities.

The Law 5037/2023 on “Renaming of the Energy Regulatory Authority to Waste, Energy and Water Regulatory Authority and expansion of its operations by including responsibilities over water and waste management, strengthening of water policy”, was published in the Official Journal A 78 of 28 March 2023 and, as per Article 275 thereof, entered into force on that date (*hereinafter referred to as “Law 5037/2023”*).

According to the Law 5037/2023 the independent Regulatory Authority for Waste, Energy and Water (*hereinafter referred to as “R.A.A.E.Y.”*) is set-up (Articles 1, 2 and 5 of Law 5037/2023) and operates on the basis of the administrative and support structure of the pre-existing Energy Regulatory Authority, which has experience in exercising regulatory and control responsibilities. The pre-existing structure is extended and three thematic branches, namely waste, energy and water, are created and exercise the responsibilities of the respective thematic branch while all three branches benefit from the support of the joint horizontal services such as the legal service (Articles 9, 10 and 21 of Law 5037/2023). The responsibilities of the waste branch of R.A.A.E.Y. are to control, regulate and supervise waste management issues in view of ensuring effective and cost-effective waste management by the regional and local waste management bodies (Articles 11, 12, 14, 15, 16 and 18 of Law 5037/2023). The R.A.A.E.Y. also examines consumers’ complaints and supervises the implementation of the measures aiming at consumers’ protection (Articles 13 and 17 of Law 5037/2023).

Entry into force of a law to reform of the regional and local waste management bodies (FODSA).

This requirement is met by the combination of the following acts.

The Law 5037/2023 reforms the FODSA’s supervision and control framework as it provides for the control of the operation of FODSA to the R.A.A.E.Y.. According to Article 11 of the Law 5037/2023, R.A.A.E.Y.’s responsibilities include, amongst others, the following tasks:

- determination of the minimum quality levels for FODSA’s waste management services;
- assessment of the fulfilment of the service quality criteria by FODSA and of any recommendations or sanctions if quality criteria are not met;
- control each FODSA’s cost-effectiveness by benchmarking the cost of corresponding waste management services provided by other FODSAs and publishes respective data on a dedicated website;

- recommendation to the Ministry of Environment and Energy on the costing and pricing method for the integrated waste management;
- control the application by FODSA of the costing and pricing policies set in the Regulation of Invoicing of the Solid Waste Management Bodies (FODSA), and of the integration of remediation costs in the total cost charged by FODSAs for waste management services;
- control the compliance with FODSA's landfill tax obligations.

Furthermore, the Joint Ministerial Decision of the Minister of Environment and Energy, and the Alternate Minister of Interior, No. 52866/451 of 12 May 2023, on the "Establishment of criteria for the evaluation of the management capacity of water service providers and solid waste management bodies, as well as the minimum levels of their fulfilment in application of Article 12 of the Law 5037/2023, which is adding Article 12B to the Law 4001/2011", that was published in the Official Journal B 3309 of 18 May 2023 and, as per Article 7 thereof, entered into force on that date, obliges FODSAs to meet a set of minimum administrative, managerial, operational, and technical criteria and to ensure financial sustainability. FODSAs provide all required data to assess these criteria and the R.A.A.E.Y. carries out an audit assessment on a yearly basis.

Law 4954/2022 on "Additional measures for the implementation of the Regulation (EU) 2019/788 of the European Parliament and of the Council on European citizens' initiative and Commission Implementing Regulation (EU) 2019/1799 laying down technical specifications for individual online systems concentration - Provisions relating to the electoral procedure and the control of revenue and expenditure of parties, coalitions and candidates for deputies and elected representatives - Other urgency Provisions" was published in the Official Journal A 136 of 9 July 2022 and, as per Article 91 thereof, entered into force on that date (*hereinafter referred to as "Law 4954/2022"*). Law 4954/2022 includes in Articles 31 to 40 thereof new "Organisational arrangements and Local Authorities' responsibilities in waste management".

More specifically, Article 36 of Law 4954/2022 clarifies the responsibilities exercised by FODSAs and strengthens their role in conjunction with Article 37, of the same law, which clarified the responsibilities exercised by local authorities. Furthermore, Articles 38, 39 and 40 of Law 4954/2022, reform and clarify provisions related to the contributions to FODSAs, property and assignment of assets of the public sector to FODSAs.

Article 93 of Law 4685/2020 on the "Modernisation of environmental legislation, transposition into Greek legislation of the Directives 2018/844 and 2019/692 of the European Parliament and of the Council, and other provisions" that was published in the Official Journal A 92 of 7 May 2020 and, as per Article 136 thereof, entered into force on that date, created two FODSAs in the South Aegean and the Ionian Islands respectively. Article 56 of law 4873/2021 on the "Protection of volunteering, strengthening of the action of Civil Society, tax incentives to strengthen the charitable action of Civil Society Organisations, and other provisions" that was published in the Official Journal A 248 of 16 December 2021, and for Article 56 had direct effect, allocated to the FODSA of South Aegean 75 new staff and to the FODSA of Ionian Islands 11 new staff positions. Article 31 of Law 4954/2022 created in the North Aegean two FODSAs, instead of four that existed previously. Furthermore, the act of the Council of Ministers, No. 31 of 27 September 2022, on the public recruitment planning for year 2023, approved 91 new staff positions for FODSAs as a step on the way to respond to the FODSAs' staffing challenges that were linked, up to a certain extent, to staff recruitment restrictions applied at the time when Greece was still under enhanced surveillance.

Entry into force of a law to introduce sound costing and pricing policies in line with “pay as you throw” and “polluter pays” principles.

The Joint Ministerial Decision of the Minister of Environment and Energy, and the Alternate Minister of Interior, No. 52977/775 of 12 May 2023, on the Regulation of Invoicing of the Solid Waste Management Bodies (FODSA), was published in the Official Journal B 3203 of 15 May 2023 and, as per Article 6 thereof, entered into force on that date, determining the costing and pricing method that is applied by FODSAs (*hereinafter referred to as “Joint Ministerial Decision No. 52977/775”*). In accordance with the pricing rules provided by Joint Ministerial Decision No. 52977/775, each FODSA applies differentiated tariffs, depending on the service provided, the degree of application in each local authority of the “pay as you throw” measures (Articles 3.1, 3.2 and 4.B of Joint Ministerial Decision No. 52977/775), and the degree of preparation for reuse and recycling of waste achieved (Article 3.3 including table 1 of Joint Ministerial Decision No. 52977/775) as per the “polluter pays” principle. In addition, Joint Ministerial Decision No. 52977/775 indicates rules for calculation, verification and reporting by local authorities (Article 4 of Joint Ministerial Decision No. 52977/775).

This reform applies in parallel with the landfill tax that is established, under milestone 56, by Article 38 of the Law 4819/2021 on the “Integrated framework for waste management – Transposition of Directives 2018/851 and 2018/852 of the European Parliament and the Council of 30 May 2018 amending Directive 2008/98/EC on waste” published in the Official Journal A 129 of 23 July 2021, and subsequently adapted by Article 110 of the Law 5043/2023 on “Arrangements relating to Local Authorities of first and second degree - Provisions for the welfare of companion animals - Provisions for public sector human resources - Other regulations of the Ministry of Interior and other urgent provisions” published in the Official Journal A 91 of 13 April 2023 and that entered into force on that date.

This reform builds also on the “pay as you throw” and “polluter pays” principles related instructions that had been already provided, under milestone 56, by the Joint Ministerial Decision of the Minister of Environment and Energy, and the Alternate Minister of Interior, No. 52977/775 of 14 December 2021, on the Structure and the minimum content of the Cleaning Regulation of the Local Authorities, published in the Official Journal B 5888 of 15 December 2021 and having entered into force on that date.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 58	Related Measure: Sustainable use of resources, climate resilience and environmental protection – Establishment of new water and wastewater regulatory authority (Measure ID: 16979)	
Name of the Milestone: Entry into force of water regulator law		
Qualitative Indicator: Entry into force of legislation		Time: Q4 2022
<p>Context:</p> <p>The measure aims at promoting the green transition, including through the establishment of a single body, the National Water Regulatory Authority (NWRA) responsible for implementing the policy for a rational management of water resources designed by the Ministry of Environment and Energy, with a view to enhance the sustainability of water utility operations and investments. Once staffed and functioning, the new regulator is expected to strengthen the institutional framework and</p>		

supervise the sector, including the rationalisation of water tariff policy in line with the ‘polluter pays’ principle and ensuring the sustainability of water services in Greece.

Milestone 58 requires the entry into force of a law for the establishment and the operation of a new Water and Wastewater Regulatory Authority.

Milestone 58 is the first step of the implementation of the reform, and it will be followed by milestone 60 related to the set-up and functioning of the water management regulatory authority. The reform has a final expected date for implementation by 31 December 2023.

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Law 5037/2023 on “Renaming of the Energy Regulatory Authority to Waste, Energy and Water Regulatory Authority and expansion of its operations by including responsibilities over water and waste management, strengthening of water policy”, published in the Official Journal A 78 of 28 March 2023 and entered into force on that date.

The authorities also provided:

- iii. Joint Ministerial Decision of the Minister of Environment and Energy, and the Alternate Minister of Interior, No. 52866/451 of 12 May 2023, on the “Establishment of criteria for the evaluation of the management capacity of water service providers and solid waste management bodies, as well as the minimum levels of their fulfilment in application of Article 12 of the Law 5037/2023, which is adding Article 12B to the Law 4001/2011”, published in the Official Journal B 3309 of 18 May 2023 and entered into force on that date.

Analysis:

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

Entry into force of a law for the establishment and the operation of a new Water and Wastewater Regulatory Authority

The Law 5037/2023 on “Renaming of the Energy Regulatory Authority to Waste, Energy and Water Regulatory Authority and expansion of its operations by including responsibilities over water and waste management, strengthening of water policy”, was published in the Official Journal A 78 of 28 March 2023 and, as per Article 275 thereof, entered into force on that date (*hereinafter referred to as “Law 5037/2023”*)

According to the Law 5037/2023 the independent Regulatory Authority for Waste, Energy and Water (*hereinafter referred to as “R.A.A.E.Y.”*) is set-up (Articles 1, 2 and 5 of Law 5037/2023) and operates on the basis of the administrative and support structure of the pre-existing Energy Regulatory Authority, which has experience in exercising regulatory and control responsibilities. The pre-existing structure is extended and three thematic branches, namely waste, energy and water, are created and exercise the responsibilities of the respective thematic branch while all three branches benefit from the support of the joint horizontal services such as the legal service (Articles 9, 10 and 21 of Law 5037/2023). The responsibilities of the water branch of R.A.A.E.Y. are to control,

regulate and supervise water and wastewater issues in view of ensuring effective and cost-effective water and wastewater services by water service providers (Articles 11, 12, 14, 15, 16 and 18 of Law 5037/2023). The R.A.A.E.Y. also examines consumers' complaints and supervises the implementation of the measures aiming at consumers' protection (Articles 13 and 17 of Law 5037/2023).

The provisions of the law 5037/2023 for the strengthening of the water policy (Articles 26 to 35 of the Law 5037/2023) further detail how the R.A.A.E.Y., through monitoring, regulating and supervising, will strengthen the institutional framework of the water sector so as to ensure the sustainability of the water services in Greece, including through the rationalisation of the water tariff policy in line with the "polluter pays" principle (Article 34 of the Law 5037/2023).

Greece adopted a law broadening the scope and size of the pre-existing 'Regulatory Authority for Energy - RAE' to cover responsibilities for, inter alia, water services, and renamed RAE as 'Regulatory Authority for Waste, Energy and Water – R.A.A.E.Y.' instead of a law for the establishment and the operation of a new Water and Wastewater Regulatory Authority. Whilst this constitutes a minimal formal deviation from the requirement of the Council implementation decision, this solution makes it possible to immediately utilise the administrative and support structure of an existing independent authority (RAE), which has strong experience in exercising regulatory and control responsibilities over natural and legal monopolies, such as electricity and gas networks, that are similar to water supply and sewerage networks natural and legal monopolies. As of this, the 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.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 78	Related Measure: Sustainable use of resources, climate resilience and environmental protection – Monitoring and Management System (Measure ID: 16910)	
Name of the Milestone: Contract for GPS		
Qualitative Indicator: Notification of award of contracts		Time: Q4 2022
<p>Context:</p> <p>The objective of this investment is to supply the Ministry of Civil Protection and Climate Crisis with digital infrastructure such as a GPS Monitoring System and early warning system, fire detection and fire extinguishing systems and emergency communication stations.</p> <p>Milestone 78 is the first milestone of the investment and concerns the notification of contract award for the GPS Monitoring System and Early warning system.</p> <p>It will be followed by milestone 81 related to the completion of the investment by end-2025 and the certification of the completion by the Ministry of Civil Protection and Climate Crisis. The investment has a final expected date for implementation on 31 December 2025.</p>		
Evidence provided:		

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

- i. Summary document duly justifying how the milestone requirements (including all its constitutive elements) have been satisfactorily fulfilled;
- ii. Copy of the decision No. 21384/02-12-2022 to award the contract for the open call for competition of Notice No 13690/01-08-2022 for the selection of a contractor for the project: 'SUB1: Fleet management system for GPS Fire Brigade, Civil Protection Vehicles in Regions and Municipalities';
- iii. Extract of the relevant parts of the technical specifications of the project proving alignment with the description of the milestone and investment in the CID;
- iv. Letter of Minister Stylianides No. 5624 of 7 April 2023 addressed to the Recovery and Resilience Facility Agency on 'Milestone 78 for the project 'GPS Vehicle Fleet Management System of Civil Protection Bodies'.

The authorities also provided:

- v. Copy of the decision No. 13690/01-08-2022 for the launch of an open call for competition for the selection of contractor for the project: "SUB1: Vehicle fleet management system GPS Fire Brigade, Civil Protection Vehicles and Municipalities', with MIS code 5174134;
- vi. List of minutes of Evaluation Committee meetings;
- vii. Additional explanations on the use of the system as early warning system (by email).

Analysis:

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

Notification of contract award for the GPS Monitoring System and Early warning system

This requirement is met as evidenced through the Decision No. 21384/02-12-2022 to award the contract for the open call for competition of Notice No 13690/01-08-2022. The authorities have tendered out and procured an "Integrated Civil Protection GPS Management Information System for the Vehicle Fleet of the Civil Protection Bodies" (*hereinafter referred to as "system"*). The details are provided in the technical specifications of the Decision No. 13690/01-08-2022 for the launch of an open call for competition for the selection of contractor for the project: "SUB1: Vehicle fleet management system GPS Fire Brigade, Civil Protection Vehicles and Municipalities', with MIS code 5174134 (in sections 1.3 and 2.1, 2.2 and 2.3 of Annex I). According to the technical specifications, it is a system consisting of equipment and software that provides information support on incidents, resources and telematic data to the competent civil protection services at central, regional and local level for the purpose of cooperative crisis management, shared situational awareness and exchange of information and cooperation with the fire brigade.

In the aforementioned specifications of the contract it is noted that the system provides the users with a range of information to better coordinate forces both before and after the occurrence of natural disasters through appropriate interoperability with the existing civil protection systems.

Furthermore, in Letter of Minister Stylianides No. 5624 of 7 April 2023 addressed to the Recovery and Resilience Facility Agency, the Greek authorities clarified the use of that system as an early warning system. According to the technical specifications, the system procured is fitted to vehicles used to prevent and respond to civil protection incidents such as forest fires and floods. In the

context of prevention, the vehicles may be involved in the wider planning of civil protection to supervise areas (surveillance of forest areas, flood-affected areas) providing timely relevant information from the field to the management centres in order for the mechanism to be activated immediately. In addition, the implemented system interconnects with the Incident, Resource and Telematics Data Management System both in terms of sharing telematics data and emergency information, also ensuring early warning and better management of potential risks.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 85	Related Measure: Connect – Fiber optic infrastructure in buildings (Measure ID: 16818)	
Name of the Milestone: Award of contract(s) for the ‘Fiber optic infrastructure in buildings’		
Qualitative Indicator: Notification of award of contract(s)		Time: Q3 2022
<p>Context:</p> <p>The investment aims to promote the installation of the fibre optic infrastructure in residential and commercial buildings and end-users’ connection with very high-capacity networks (VHCN) based on a demand subsidy (voucher) scheme that shall subsidize (a) the costs of internal cabling and (b) the connection fees (the one-off setup fee of broadband services).</p> <p>Milestone 85 requires the award of contract(s) following the successful completion of the tender process for the ‘Fiber optic infrastructure in buildings’ project. The Information Society SA/ Ministry of Digital Governance shall ensure that all the submitted applications are examined to confirm whether the applications properly address the Call's demands. Upon the selection of the appropriate contractor, the Information Society S.A./ Ministry of Digital Governance shall proceed with contract award which shall define the obligations, roles and responsibilities of contracting parties.</p> <p>Milestone 85 is the first step of the implementation of the investment and is linked to the launch of a voucher scheme aiming at subsidizing the costs of internal cabling as per strand a) of the measure description. It will be followed by the implementation of a voucher scheme aiming at subsidizing the connection fees (the one-off setup fee of broadband services) as per strand b) of the measure description and reflected in target 90, related to the connection of 120,000 private buildings with FTTH fibre optic infrastructure. The investment has a final expected date for implementation in Q4 2025.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. Summary note; ii. Copy of Law 4994/2022, Official Journal A 215/18.11.2022, article 43, which sets down the legal basis for the programme Smart Readiness: “<i>Programme Infrastructure Readiness for Smart Buildings (Smart Readiness)</i>”; iii. Copy of Joint Ministerial Decision 1421 B 942/23.02.2023/1421 of the Ministers of Finance, Development and Investment, Environment and Energy, and Digital Governance, concerning 		

the terms and conditions and arrangements relating to the Programme Infrastructure Readiness for Smart Buildings Programme (Smart Readiness);

- iv. Copy of call for proposals launching the Smart Readiness Programme with protocol number 5906/22.03.2023, uploaded in Diavgeia platform (number of digital upload ΑΔΑ: 643Β469Η4Σ-Φ94).

The authorities also provided:

- v. Copy of the decisions of the Managing Director of Information Society Société Anonyme approving the installers' registry, namely:
 - a. Copy of the decision of 7 April 2023, with protocol number 6975/03.04.2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: 61ΛΘ469Η4Σ-ΔΛΙ), for the approval of two applications for the participation of suppliers in the smart readiness programme (1st decision of approval of suppliers to join the installers' registry);
 - b. Copy of the decision of 28 April 2023, with protocol number 9097/28.04.2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: 9ΤΖΠ469Η4Σ-ΝΧΔ), for the approval of three applications for the participation of suppliers in the smart readiness programme (2nd decision of approval of suppliers to join the installers' registry);
 - c. Copy of the decision of 12 May 2023, with protocol number 10359/12-05-2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: 9ΡΚΩ469Η4Σ-7ΗΕ), for the approval of one application for the participation of suppliers in the smart readiness programme (3rd decision of approval of suppliers to join the installers' registry);
 - d. Copy of the decision of 30 May 2023, with protocol number 11765/30-05-2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: 9Β2Ρ469Η4Σ-57Π), for the approval of three applications for the participation of suppliers in the smart readiness programme (4th decision of approval of suppliers to join the installers' registry);
 - e. Copy of the decision of 8 June 2023, with protocol number 12476/08-06-2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: 66Φ6469Η4Σ-00Σ), for the approval of one application for the participation of suppliers in the smart readiness programme (5th decision of approval of suppliers to join the installers' registry);
 - f. Copy of the decision of 14 June 2023, with protocol number 12967/14-06-2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: ΨΩΚ2469Η4Σ-ΓΥΥ), for the approval of four applications for the participation of suppliers in the smart readiness programme (6th decision of approval of suppliers to join the installers' registry);
 - g. Copy of the decision of 10 July 2023, with protocol number 14873/10-07-2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: 6ΟΩ7469Η4Σ-ΔΒΥ), for the approval of four applications for the participation of suppliers in the smart readiness programme (7th decision of approval of suppliers to join the installers' registry);
 - h. Copy of the decision of 14 July 2023, with protocol number 15350/14-07-2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: ΨΦ0Ι469Η4Σ-ΦΤΙ), for the approval of four applications for the participation of suppliers in the smart readiness programme (8th decision of approval of suppliers to join the installers' registry);
 - i. Copy of the decision of 14 September 2023, with protocol number 19463/14-09-2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: Ε68Ζ469Η4Σ-ΔΝΚ), for the approval of four applications for the participation of suppliers in the smart readiness programme (9th decision of approval of suppliers to join the installers' registry);
 - j. Copy of the decision of 29 September 2023, with protocol number 20529/29-09-2023, and number of electronic upload on Diavgeia platform (ΑΔΑ: 923Ω469Η4Σ-ΝΡ7), for the

approval of five applications for the participation of suppliers in the smart readiness programme (10th decision of approval of suppliers to join the installers' registry).

- vi. The links to the application web platform <https://smartreadiness.gov.gr/>, to the application web platform for installers: <https://installers.smartreadiness.gov.gr/> and to the application web platform for beneficiaries: <https://beneficiaries.smartreadiness.gov.gr/>
- vii. A print screen from the platform showing the approval of the first applications by end-users.

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 'Fiber optic infrastructure in buildings' project

The Council Implementing Decision required the *Award of contract(s) following the successful completion of the tender process for the 'Fiber optic infrastructure in buildings' project*. The voucher scheme was partly redesigned so that voucher applications are submitted by the installer who will be selected by the end-user representing all the tenants of the building and not by individual tenants. Against this background, by means of the call for proposals launching the Smart Readiness Programme with protocol number 5906/22.03.2023, the Information Society has launched a so-called installers' portal (available here: <https://www.ktpae.gr/erga/smart-readiness/>) where installers are able to submit their applications to participate in the measure, starting from 23 March 2023 until the end of the Programme, 31 December 2025. Installers' applications are examined by the Information Society/Ministry of Digital Governance and the selection of eligible installers is performed and selected installers are approved by mean of decisions by the Information Society approving the installers' registry and defining their obligations, roles, and responsibilities. The authorities also provided the links to the platform (<https://smartreadiness.gov.gr/>) and to the application platforms for both installers and for beneficiaries (respectively <https://installers.smartreadiness.gov.gr/> and <https://beneficiaries.smartreadiness.gov.gr/>), evidence that the platform has been opened to applications early October and a print screen showing the approval of the first applications by end-users. More specifically, the authorities have provided 10 decisions by the Information Society approving the installers' registry (more decisions can be approved subsequently as installers' applications are submitted and assessed on a continuous basis), as indicated in the evidence list.

Whilst the adoption of a series of decisions approving the installers' registry constitutes a minimal substantive deviation from the notification of award of contract(s) required by the Council Implementing Decision, the objective of the measure has been reached through a different set-up. This different set-up allows reducing complexity and facilitates the application process as instead of having to support individuals (possibly with limited digital literacy) to submit the application, installers undertake the respective administrative tasks and the end-user representing all the tenants of the building only provides his consent. In addition, this different set-up ensures a deployment capacity identical to the original set-up in terms of building installations per month and is therefore at least as conducive as the original set-up to the fulfilment of target 90. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

The Information Society SA/Ministry of Digital Governance shall ensure that all the submitted applications are examined to confirm whether the applications properly address the Call's demands

In line with the requirements of the Council Implementing Decision, as indicated in the evidence list, Greece has provided two decisions by the Information Society. These decisions prove that the Information Society has examined all submitted proposals and whether the applications properly address the Request for Proposal demands. These decisions include references respectively to the Recommendation of the Ministry of Finance dated 30-03-2023/OE.03-04-2023 (Government Gazette, Series I, No 387784) 'Smart Readiness' programme and to the Recommendation of the Ministry of Finance of 26-04-2023 (Government Gazette, Series I, No 389951) 'Smart Readiness' programme which contain the result of the assessment of installers' applications and indicate which applications properly address the RFP demands.

Upon the selection of the appropriate contractor, the Information Society SA/Ministry of Digital Governance shall proceed with contract award which shall define the obligations, roles and responsibilities of contracting parties

Decisions 6975/03.04.2023 and 9097/28.04.2023 by the Information Society approving the installers' registry also define the installers' obligations, roles, and responsibilities. Furthermore, in line with the description of the measure,

The investment promotes the installation of the fibre optic infrastructure in residential and commercial buildings and end-users' connection with very high-capacity networks (VHCN) based on a demand subsidy (voucher) scheme that shall subsidize (a) the costs of internal cabling and (b) the connection fees (the one-off setup fee of broadband services)

Due to State aid considerations, the Greek authorities widened the scope of strand a) of the measure ("costs of internal cabling") to also include all necessary infrastructure to turn the buildings "smart-ready", in addition to fibre optic intra building cabling. As a result, the measure has been renamed "Smart readiness" and apart from vertical and horizontal fibre optic intra-building cabling, eligible expenses include also ducts connecting (i) electricity consumption meters, (ii) natural gas consumption meters, (iii) the central heating compartment of the building, (iv) the elevator compartment of the building.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 93	Related Measure: Modernise – Digitisation of archives and related services (Measure ID: 16778)	
Name of the Milestone: Contract(s) award for digitisation of archives		
Qualitative Indicator: Notification of contract(s) award covering all 9 subprojects of the digitisation of archives project		Time: Q4 2022
Context: The objective of the investment is to make the public administration more efficient, by reducing the time cost of providing services to the public, and achieving significant cost savings and the freeing-up of resources within the public administration. It entails the digitization of key archives in the public administration and other necessary actions, including the integration of the digitized archives		

in the relevant IT systems. Specifically, the investment consists of nine subprojects in the areas of justice, public health, general archives of the state, immigration and asylum, expropriations, urban planning, cadastre's mortgage offices, maritime, as well as the pilot implementation for the model keeping of archives for secure storage in other public sector archives.

Milestone 93 requires the award of the contract(s) for the digitisation of the archives of 9 subprojects, including all their constituent components: 1: justice; 2: public health; 3: general archives of the state; 4: immigration and asylum; 5: expropriations; 6: urban planning agencies; 7A: cadastre; 7B: cadastre's improved digital services; 8: maritime; 9: secure storage of public sector and "broader" public sector. The specifications shall include timelines and objectives and shall detail for each of the 9 subprojects the following: 1. Digitisation of physical records; 2. Migration of digital records into existing systems (incl. Justice files in OSDDY-PP/OSDDY-DD; property titles in the Information System of National Land Registry); 3. Analysis, design and implementation of Data Centres and the infrastructure located to local agencies, together with the appropriate single window (incl. central repository for patients' records; Integrated Geographical Information System of the Unified digital Map of Expropriations and Claims for expropriations; Document & Digital File Management System (DMS / DAS) for Cadastral records; installation of the archive management software); and 4. Support services (incl. new electronic services related to the search and retrieval of files for citizens; public administration; researchers for State Archives).

Milestone 93 is the first step of the implementation of the investment and it will be followed by targets 94 and 95, related to the digitisation of at least 30% and 90% respectively, of total archives across all 9 subprojects, calculated in number of pages digitised in total. The investment has a final expected date for implementation in Q4 2025.

Evidence provided:

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

- i. Summary note;

Subproject 1: Digitisation of the archives of the Justice System:

- ii. Decision for the launch of the call for tender signed by the Managing Director of Information Society Société Anonyme on 24 November 2022, with protocol number 20738/24-22-2022 and number of electronic upload on Diavgeia platform (ADA number) 22PROC011705122.
- iii. Modification of the Decision for the launch of the call for tender signed by the Managing Director of Information Society Société Anonyme on 24 January 2023, with protocol number 1459/24-01-2023 and number of electronic upload on Diavgeia platform (ADA number) 23PROC012024422.
- iv. Contract award decision on "Digitisation of the Archives of the Ministry of Justice" Number 12223/06-06-2023.
- v. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 27 March 2023.

Subproject 2: Digitisation of the archives of the Public Health System

- vi. Decision for the launch of the call for tender signed by the Managing Director of Information Society Société Anonyme on 21 December 2022, with protocol number 22776/20-12-2022 and number of electronic upload on Diavgeia platform (ADA number) 22PROC011901962.

- vii. Contract award decision on “Digitisation of the Archives of the Public Health System” Number 10633/16-05-2023.
- viii. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 17 May 2023.

Subproject 3: Digitisation of the General Archives of the State:

- ix. Decision for the launch of the call for tender signed by the Managing Director of Information Society Société Anonyme on 17 January 2023, with protocol number /17-01-2023 and number of electronic upload on Diavgeia platform (ADA number) 23PROC012017720.
- x. Contract award decision on “Digitisation of the General Archives of the State” Number 8045/13-04-2023.
- xi. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 13 April 2023.

Subproject 4: Digitisation of the archives of the immigration and asylum system

- xii. Decision for the launch of the call for tender signed by General Secretary for Migration Policy on 7 July 2023, with protocol number 397795 and number of electronic upload on Diavgeia platform (ADA number) 22PROC010893074.
- xiii. Contract award decision on “Digitisation of the archives of the immigration and asylum system” Number 653418/02-11-2022.
- xiv. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 3 November 2022.

Subproject 5: Digitisation of the archives of expropriations

- xv. Decision for the launch of the call for tender by the General Secretariat for Infrastructure, of the Ministry of Infrastructure and Transport, on 27 December 2022, with protocol number 412476 and number of electronic upload on Diavgeia platform (ADA number) 22PROC011905060.
- xvi. Clarification of Decision for the launch of the call for tender signed by the Minister for Infrastructure and Transport on 23 January 2023, with protocol number Δ11/21468 and number of electronic upload on Diavgeia platform (ADA number) 2022TA77100011.
- xvii. 1st modification of Decision for the launch of the call for tender signed by the Minister for Infrastructure and Transport on 24 January 2023, with protocol number Δ11/28333 and number of electronic upload on Diavgeia platform (ADA number) 23PROC012043237.
- xviii. 2nd modification of Decision for the launch of the call for tender signed by the Minister for Infrastructure and Transport on 03 February 2023, with protocol number Δ11/39995 and number of electronic upload on Diavgeia platform (ADA number) 23PROC012097678.
- xix. Contract award decision on “Digitisation of the archives of expropriations” Number Δ11/136363.
- xx. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 2 May 2023.

Subproject 6: Digitisation of the archives of Urban Planning Agencies

- xxi. Decision for the launch of the call for tender signed by the President of the Technical Chamber of Greece on 3 August 2022, with protocol number 22217 and number of electronic upload on Diavgeia platform (ADA number) 22PROC011050933.
- xxii. Contract award decision on “Digitisation of the archives of Urban Planning Agencies” for part 1 of the call for tender, Number LOT1: 36657/23-12-2022.

xxiii. Contract award decision on “Digitisation of the archives of Urban Planning Agencies” for part 2 of the call for tender, Number LOT1: 36658/23-12-2022.

xxiv. Notifications of contract award decisions from the Central Electronic Public Procurement Registry (ESIDIS) of 23 December 2022 for parts 1 and 2 of the call for tender, respectively

Subproject 7A: Digitisation of the archives of the Cadastre (Ktimatologio)

xxv. Decision for the launch of the call for tender signed by the Executive Director of the Hellenic Cadastre (Ktimatologio) on 12 November 2021, with number of electronic upload on Diavgeia platform (ADA number) 21PROC009530611.

xxvi. Contract award decision on “Digitisation of the archives of the Hellenic Cadastre (Ktimatologio)” section 1 of the call for tender, Number 9Y7X46MΨΦΖ-Λ0Y/09-05-22.

xxvii. Contract award decision on “Digitisation of the archives of the Cadastre (Ktimatologio)”, sections 2-5 of the call for tender, Number 9ΩMO46MΨΦΖ-333/18-10-2022.

xxviii. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 10 May 2022.

xxix. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 21 October 2022.

Subproject 7B: Cadastre’s improved digital services

xxx. Decision for the launch of the call for tender signed by the Chair of the Board of Directors of the Hellenic Cadastre (Ktimatologio)” on 22 February 2023, with number of electronic upload on Diavgeia platform (ADA number) 23PROC012181735.

xxxi. Decision for the launch of the call for tender signed by the Chair of the Board of Directors of the Hellenic Cadastre (Ktimatologio)” on 24 February 20230 with number of electronic upload on Diavgeia platform (ADA number) 23PROC012196445

xxxii. Contract award decision on “Cadastre’s improved digital services” for the implementation of a multichannel communication centre (Communication Hub), Number PΠΞ46MΨΦΖ-P02/25-05-2023.

xxxiii. Contract award decision on “Cadastre’s improved digital services” for the development of an Integrated Information System and unified cadastral services and enhancement of the digital services of the Hellenic Cadastre, Number 9XKH46MΨΦΖ-Φ6N /30-06-2023.

xxxiv. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 12 May 2023 for both tender competitions.

Subproject 8: Digitisation of the archives of Maritime

xxxv. Decision for the launch of the call for tender signed by the Managing Director of Information Society Société Anonyme on 5 January 2023, with protocol number 217/05-01-2023 and number of electronic upload on Diavgeia platform (ADA number) 23PROC011972708.

xxxvi. Contract award decision on “Digitisation of the archives of the Ministry of Maritime Affairs and Insular Policy”, Number 12274/06-06-2023.

xxxvii. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 7 June 2023.

Subproject 9: Secure Storage of Public Sector and “Broader” Public Sector

xxxviii. Decision for the launch of the call for tender signed by the Managing Director of Information Society Société Anonyme on 19 January 2023, with protocol number 1125/19-01-2023 and number of electronic upload on Diavgeia platform (ADA number) 23PROC012027045.

xxxix. Contract award decision on “Secure Storage of Public Sector and “Broader” Public Sector” Number 12222/06-06-2023.

xl. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 7 June 2023.

Analysis:

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

Award of the contract for the 9 subprojects, including all their constituent components:

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece notified the award of the contract for each of the respective subprojects. This is demonstrated through the issuance of the relevant decisions of contract award by the respective contracting authorities for each of the subprojects (as listed in the evidence section above). Specifically, the dates for the notification are as follows:

- Subproject 1: Digitisation of the archives of the Justice System: 27 March 2023
- Subproject 2: Digitisation of the archives of the Public Health System: 17 May 2023
- Subproject 3: Digitisation of the General Archives of the State: 13 April 2023
- Subproject 4: Digitisation of the archives of the immigration and asylum system: 3 November 2022
- Subproject 5: Digitisation of the archives of expropriations: 2 May 2023
- Subproject 6: Digitisation of the archives of Urban Planning Agencies: 23 December 2022
- Subproject 7A - Digitisation of the archives of the Cadastre (Ktimatologio): 21 October 2022 and 10 May 2022, which cover all the constituent components of the subproject (split into 5 parts on the basis of geographical areas, to meet the needs of all across all regions in Greece)
- Subproject 7B - Cadastre's improved digital services: 12 May 2023 for both tender competitions which cover all the constituent components of the subproject
- Subproject 8 - Digitisation of the archives of Maritime: 7 June 2023
- Subproject 9: Secure Storage of Public Sector and "Broader" Public Sector: 7 June 2023

The scope of each project, as well the specifications that fulfil the CID Annex requirements are included in the respective sections of the calls for tender launched for each subproject, as follows:

Specifications shall include timelines and objectives

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece launched calls for competitive tenders detailing the specifications for each subproject. These specifications include the timelines for the delivery of the requested work packages, and the objectives to be achieved by the contractors at each phase of each subproject. Specifically, timelines and objectives are detailed in the respective calls for tender, as follows:

- Subproject 1: Digitisation of the archives of the Justice System: Annex I (section 2.2, pages 138-143)
- Subproject 2: Digitisation of the archives of the Public Health System: Annex I (sections 6.1 and 6.2, pages 138-151)
- Subproject 3: Digitisation of the General Archives of the State: Annex I (sections 7.1, 7.2, and 7.3, pages 236-249)
- Subproject 4: Digitisation of the archives of the immigration and asylum system: Annex I (section A4, pages 87-91)

- Subproject 5: Digitisation of the archives of expropriations: Annex I (section I.7, pages 196-202)
- Subproject 6: Digitisation of the archives of Urban Planning Agencies: Annex I (section 7.1.4.1, pages 132-137)
- Subproject 7A - Digitisation of the archives of the Cadastre (Ktimatologio): Annex I (section 7.1.4.1, pages 130-134)
- Subproject 7B - Cadastre's improved digital services: Annex I (section I.7, pages 137-139) of the call for tender for the development of the Integrated Geospatial and Cadastral Information Management System, and Annex I (sections 1.3.8, pages 98-102) of the call for tender for the development of the Communication Hub, respectively
- Subproject 8 - Digitisation of the archives of Maritime: Annex I (sections 6.1 and 6.2, pages 147-154)
- Subproject 9: Secure Storage of Public Sector and "Broader" Public Sector: Annex I (section A.4, pages 92-96).

Specifications shall detail for each subproject the digitalisation of physical records In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece launched calls for competitive tenders (as listed in the evidence section above), detailing the specifications for each subproject. These specifications include the digitisation of physical records (archives) for each subproject, as follows:

- Subproject 1: Digitisation of the archives of the Justice System. The project includes the digitisation and metadata processing of the archives of 368 Courts. The said requirements on the digitization of A3/A4 bound & unbound physical pages, including on Optical Character Recognition (OCR) and anonymizing process, are detailed in section 1.3, pages 9-10, in Annex I (section 1.2.1, pages 82-83 and section 2.1.1.1.4, page 120) and in Annex II (page 153).
- Subproject 2: Digitisation of the archives of the Public Health System. The project includes the digitization and metadata processing of health records archives, and specifically of imaging examinations of various sizes (X-rays, Axial, Magnetic C Camera, Cardiographs) for hospitals across Greece. The said requirements are included section 1.3.1, page 8, and elaborated in Annex I (section 2.2, page 91, section 5.4.1.2.1, pages 112-113, and section 5.5.2, page 127) and Annex II (table A.2, page 161).
- Subproject 3: Digitisation of the General Archives of the State. The project includes the digitisation and metadata processing of A3/A4/A2/A1/A0 pages of the General Archives of the State (central and local agencies). The said requirements are provided in Annex I (section 2.2, pages 103-105, section 6.1, pages 193-194, and section 6.1.1, pages 195-196).
- Subproject 4: Digitisation of the archives of the immigration and asylum system. The project includes the digitisation and metadata processing of (A4 bound & unbound) of the immigration and asylum system. The said requirements are provided in Annex I (sections A.2.1 and A.2.1.1, pages 73-74, and A.2.1.2, page 75).
- Subproject 5: Digitisation of the archives of expropriations. The project includes the digitisation and metadata processing of physical pages (A0, A1, A3) of claims, topographical and cadastral designs, and other archives of the Expropriation Department. The said requirements are provided in Annex I (sections I.2.1.2, pages 101-102, and I.4.14.4.2, pages 153-155).
- Subproject 6: Digitisation of the archives of Urban Planning Agencies. The project includes the digitization and metadata processing of imaging archives (static, architectural and

topographic drawings) of various sizes and the geocoding of the building permit files which exist in the Urban Planning Services of the Municipalities of Greece. The said requirements are detailed in Annex I (sections 7.1.2.2, page 87, and 7.1.3.1.2.3, pages 92, 96, 106 and 116) and Annex 7.6 (page 159).

- Subproject 7A - Digitisation of the archives of the Cadastre (Ktimatologio). The project includes the digitisation and metadata processing in relation to the property titles and the respective documents (size A0/A1/A3) in the mortgage offices across all regions in Greece. The said requirements are provided in sections 1.3.1, page 4, and 1.3.2, pages 5-6, and Annex I (section 7.1.3.1.1.1.2, pages 80-102) and Annex II (section 1, pages 145-146).
- Subproject 8 - Digitisation of the archives of Maritime. The project includes the digitisation of physical records (A4/A3 bound & unbound) of the Ministry of Maritime Affairs and Insular Policy (ship registry, companies' files, personal seafarers' files, other maritime files). Specifically, these records concern the registry files of the Central Port Authority of Piraeus (i.e. registration of ships in the respective ports and related documents), ship registry files, shipping companies registry files and foreign and domestic shipping companies registry files of the Overseas Shipping Directorate, and the registry files of the Directorate of Seafarers' Training (i.e. training certificates and other documentation related to seafarers' files). The said requirements are provided in Annex I (sections 2.1, pages 91-104, and 5.4.1.2.1, pages 121-122).
- Subproject 9: Secure Storage of Public Sector and "Broader" Public Sector. The main aim of the project is to launch, on a pilot basis, the implementation of a secure and safe storage system of the physical archives of the public sector and broader public sector, in accordance with international practices, so that physical archives can be stored in a secure location and easily retrieved for use, and also for the purposes of digitalisation as needed, also be safely maintained over time. The scope of the project thus includes, indicatively, services concerning the ad-hoc and targeted digitisation of archives, metadata entry, and electronic management of the digitised archives, such as automatic indexing and information retrieval. The said requirements are detailed in Annex I (sections A.2, pages 82-83, A.3, pages 83—84, and A.3.7.2, page 91) and Annex II (section 10, page 110).

Specifications shall detail for each subproject the migration of digital records into existing systems (incl. Justice files in Integrated System for File Management for Penal and Civil Courts (OSDDY-PP)/Integrated System for File Management for Administrative Courts (OSDDY-DD); property titles in the Information System of National Land Registry)

In line with the description of the milestone and the requirements of the Council Implementing Decision, for each of the subprojects Greece launched calls for competitive tenders (as listed in the evidence section above), detailing the specifications for each subproject. These specifications include the migration of digital records into existing systems for each subproject, as follows:

- Subproject 1: Digitisation of the archives of the Justice System. The the sub-project includes the migration of data in the OSDDY-PP system used in penal and civil courts. Specifically, section 1.3.1, page 10, section 6.1.1, page 75, as well as Annex I (sections 1.2.1, page 83 and section 2.1.4.1, page 135) of the call for tenders provide the specifications for migration of the digital records into the existing systems of the Ministry of Justice, such as the OSDDY-PP system. Further, the use of metadata, the scanning of penal and civil court archives, the validation of data contained, and the interlinkage of that data with the OSDDY-PP system are detailed in Annex I (section 2.1.1.1.1.1, pages 91-108).

- Subproject 2: Digitisation of the archives of the Public Health System. Section 1.3.1, pages 8 and 10, and Annex I (sections 2.2, page 91, 3.1, pages 92-97, 3.2.2, page 98 and 5.7, page 135) detail the architecture of the integrated system for electronic document management and data repository and the functional specifications of the application enabling migration of digital records.
- Subproject 3: Digitisation of the General Archives of the State. Annex I (section 6.5, pages 220-221) and Annex II (section 4, pages 346-350) detail the specifications on data cleansing and migration from existing systems, and archiving of the digital material in a central repository system to host the digital content.
- Subproject 4: Digitisation of the archives of the immigration and asylum system. Annex I (section A.2.1.3, pages 75-76) outlines the migration requirements for data included in the individual files of third country citizens into the existing integrated information system for migration.
- Subproject 5: Digitisation of the archives of expropriations. Annex I (sections I.2.1.4.3, page 103, I.4.14.4.2, page 154, and I.5.2, pages 168-169) details the requirements for digital processing of data to allow migration into the new data centre and system (e-apallotriosi) for the management of expropriations data, and the transition of the data in G-Cloud environment, which is the main government cloud.
- Subproject 6: Digitisation of the archives of Urban Planning Agencies. Annex I (section 7.1.3.1.2, page 90, and 7.1.3.1.2.3, pages 109 and 121) provides for the migration of data included in the digital archives to the new information system and their categorization on the basis of a code system.
- Subproject 7A - Digitisation of the archives of the Cadastre (Ktimatologio). Annex I (sections 7.1.3.2.7, page 120, and 7.1.4.1.4, pages 133-134) provides for the migration of the data included in the digital archives into the new information system (storage facility) to be developed in the context of this subproject to host the new digital content thereon. The new system will interoperate with the existing Information System of the National Land Registry (Cadastre) and make possible, through the use of web services, the accessibility of the digital content also through the existing system.
- Subproject 7B - Cadastre's improved digital services. The scope of the project includes the development of an Integrated Geospatial and Cadastral Information Management System. This will serve as a single point of entry for all Cadastre's services by bringing together data from all sources, including data from the new information system to host the digital archives under subproject 7A, and data migration from such sources to new IT Infrastructure. Annex I (section I.6.3, pages 130-131) of the call for tender for the development of the Integrated Geospatial and Cadastral Information Management System outlines the data cleansing and migration services to the new infrastructure.
- Subproject 8 - Digitisation of the archives of Maritime. Annex I (sections 5.1.3, pages 116-117, 5.4.1.2.2, pages 122-124, 5.5, page 137, 5.5.6.5 and 5.6, page 145) provide for the data migration services in relation to the digital archives to the existing systems of the Ministry of Maritime Affairs and Insular Policy.
- Subproject 9: Secure Storage of Public Sector and "Broader" Public Sector. While digitisation is not the main purpose of this subproject, the scope of the pilot project indicatively includes ad-hoc and on-demand digitisation of the archived material, and services for electronic management of the digitised archives. The said requirements are detailed in Annex I (sections A.3.7.1 and A.3.7.2, page 91) and Annex II (section 10, page 110). Thus, data

migration services are only implicitly included in its scope, through the obligation for the management of the digitised archives with the use of electronic means.

Specifications shall detail for each of the subprojects the analysis, design and implementation of Data Centres and the infrastructure located to local agencies, together with the appropriate single window (incl. central repository for patients' records; Integrated Geographical Information System of the Unified digital Map of Expropriations and Claims for expropriations; Document & Digital File Management System (DMS / DAS) for Cadastral records; installation of the archive management software).

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece launched calls for competitive tenders (as listed in the evidence section above), detailing the specifications for each subproject. These specifications include the analysis, design and implementation of Data Centres and the infrastructure located to local agencies, together with the appropriate single window for each subproject, as follows:

- Subproject 1: Digitisation of the archives of the Justice System: Annex I (section 1.2.3.1, pages 84-87) details the Ministry of Justice's current infrastructure (Data Centres and existing systems, including the Integrated System for File Management for Penal and Civil Courts (OSDDY-PP)) and Annex I section 1.2.3.2, pages 87-90) details the Ministry's new infrastructure to be implemented, including through the next phase of development of the OSDDY-PP system. Annex I (section 2.1.3, pages 131-134) also provides the architectural design for the new Document and Digital File Management System (digital repository) that will be implemented within the scope of the project.
- Subproject 2: Digitisation of the archives of the Public Health System. Annex I (section 3, pages 92-99) and Annex II (Table A.3, pages 163-165) detail the specifications concerning the digitization and migration to the electronic document management system for patient records. Further, Annex I (section 5.6, pages 134- 135) outlines the process for matching the physical archives and the electronic patient registry in order to unify all patient related information in a single digital file. The details and technical specifications for the central repository system for health records are provided in Annex I (sections 3.3, page 100, and 4, pages 100-103), and the interoperability requirements with the integrated system for document management and archiving system are provided in Annex I (sections 4.2, page 102, and 5.1.4, page 106). The functional specifications for the electronic document management and central data repository, including cataloguing/data entry and sampling, are provided in Annex I (section 3, pages 92-100). Lastly, Annex I (section 1.2.3, pages 87-88) provides for the set-up of the central repository infrastructure in H-Cloud, the dedicated cloud infrastructure for health-related data in the public sector.
- Subproject 3: Digitisation of the General Archives of the State. Annex I (sections 1.1.3.4.4, pages 92-94, 1.1.3.4.6, pages 94-96, and 3.1, pages 112-117) details the current architectural design and system infrastructure in place for the General Archives of the State. Annex I (sections 2, pages 98-102, 4, pages 125-133, and 5, pages 134-190) and Annex II (sections 1.2, pages 256-259, 2.3, pages 263-264, and 2.8, pages 270-271) detail the technical specifications and architectural design for an Integrated Information System (IIS) and its subsystems to support all the processes of the General State Archives (including content management, electronic document management and digital signature), a central data repository for the archived material, and the interoperability requirements for the new infrastructure and other relevant systems.

- Subproject 4: Digitisation of the archives of the immigration and asylum system. Annex I (sections A.2.16, page 77, and A.3, pages 77-86) specifies the infrastructure for the storage of the digital archives and the specifications for the new system for electronic document management, including its subsystems and interoperability requirements with relevant third systems needed in order to facilitate the data exchange needed between the involved services of the Ministry of Migration and Asylum and other public bodies.
- Subproject 5: Digitisation of the archives of expropriations. Annex I (sections I.1.2, I.1.2.1, I.1.2.2, I.1.2.3 and I.1.2.4, pages 86-97) provides the analysis and architectural design of existing infrastructure and databases, to be taken into account in the design of the new digital infrastructure. The scope of the project includes the development of a modern and comprehensive Integrated Geographical Information System (GIS) of the Unified digital Map of Expropriations and Claims for expropriations with a cartographic background (e-apalotriosis), to act as a single source of data for expropriations. Annex I (sections I.2.1.3, pages 103-106, I.3, pages 109-113, I.4.11, pages 128-130, and I.4.12, pages 132-139) outlines the new system architecture, functional and technical specifications for the GIS and a central repository of data (including the development of a content management system), and the interoperability requirements between the GIS, the central repository, and all the relevant third systems to facilitate the seamless exchange of relevant data.
- Subproject 6: Digitisation of the archives of Urban Planning Agencies. Annex I (section 7.1.1.2.1.6, pages 80-81) outlines the specifications for a new Geographical Information System (GIS) for the completed construction and electronic identity of buildings, including the development of relevant databases such as for existing buildings, and the interoperability requirements of the GIS with spatial databases and key third systems.
- Subproject 7A - Digitisation of the archives of the Cadastre (Ktimatologio). Annex I (section 7.1.1.1.2.3, pages 65-68) analyses the specifications and design of data centers, and the equipment and information systems currently in place. Further, Annex I (sections 7.1.3.2.4 - 7.1.3.2.9, pages 118-122, and 7.1.3.3.1, pages 122-126) outlines the architecture of the new applications and data storage system to be developed, the requirements for its interoperability with the existing infrastructure, and its functionalities and subsystems, including a content management system, document and digital file management system, and user portal.
- Subproject 7B - Cadastre's improved digital services. The scope of the project includes the development of an Integrated Geospatial and Cadastral Information Management System. This will serve as a single point of entry for all Cadastre's services by bringing together data from all sources, including data from the new information system to host the digital archives under subproject 7A. Annex I (sections I.3, pages 84-88, and I.4, pages 89-116) outline the architecture and Single Window design of the new integrated system, the technical specifications of its subsystems, the interoperability requirements between this system and other infrastructure, the system's unified portal and functional services, and the transition of all services and applications offered through the unified portal to the g-cloud, the government's main cloud infrastructure.
- Subproject 8 - Digitisation of the archives of Maritime. Annex I (sections 3.1, pages 107-108, and 4.2, pages 110-112) outlines the functional specifications for the development of an electronic document management system for the storage and management of the digital archives for use by the competent departments of the Ministry of Maritime Affairs and Insular Policy, and the interoperability requirements between this system and third systems of the Ministry.

- Subproject 9: Secure Storage of Public Sector and “Broader” Public Sector. Annex II (section 2, pages 98-99) provides for the development of a digital platform to support users in the management of the physical archives, the platform’s interoperability requirements with existing systems of the General State Archives, and its various subsystems such as for data entry and file management.

Specifications shall detail for each of the subprojects the support services (incl. new electronic services related to the search and retrieval of files for citizens; public administration; researchers for State Archives)

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece launched calls for competitive tenders (as listed in the evidence section above), detailing the specifications for each subproject. These specifications include the support services to be implemented for each subproject, as follows:

- Subproject 1: Digitisation of the archives of the Justice System. The scope of the project includes the provision of support services for users, including the implementation of a helpdesk and search and retrieval functionalities. The said requirements are elaborated in Annex I (section 2.1.2.4, pages 130-131, section 2.1.4.5, pages 137-138, and section 2.2.7.2, page 149).
- Subproject 2: Digitisation of the archives of the Public Health System. The scope of the project includes the provision of integrated digital services to target users (citizen/patients, healthcare providers/hospital staff) and digital access to data stored in the patients’ medical records. Specifically, new electronic services related to the search and retrieval of files, research support and other support are detailed in section 1.3.1, pages 8-10 and in Annex I (section 3.1, pages 92-96).
- Subproject 3: Digitisation of the General Archives of the State. The scope of the project includes the development of an online portal to provide the public access to the general archives of the State (for archives that are not subject to legal or other access restrictions) both for research purposes and personal interest. Annex I (sections 2.1, pages 101-105, and 2.3.1, pages 141-144) details the new electronic services related to the search and retrieval of files, research support, helpdesk, new portal and cataloguing services, and Annex II (Section 3.1, page 272) details the technical specifications for the portal.
- Subproject 4: Digitisation of the archives of the immigration and asylum system. Annex I (section A.3, pages 83-84) details the new electronic services related to the search and retrieval of files to be made available to internal users and to citizens.
- Subproject 5: Digitisation of the archives of expropriations. Annex I (sections 1.2.1.3, pages 105-106, 1.4.6, pages, 118-119, and 1.4.7, page 120) provide the specifications for the design of a users’ portal to provide data access to citizens, researchers and other professionals such as engineers and lawyers, and the creation of new electronic services related to the search and retrieval of expropriation files to such users. The applications for managing and monitoring expropriations processes by internal users and staff from relevant third parties are also outlined in the abovementioned sections.
- Subproject 6: Digitisation of the archives of Urban Planning Agencies. Annex I (section 7.1.3.1.2.3, pages 94-96) detail the specifications for the new electronic services related to the search and retrieval of files for citizens and professionals, including maximum response times, cataloguing and file categorisation to ensure swift and efficient access to users.
- Subproject 7A - Digitisation of the archives of the Cadastre (Ktimatologio). The scope of the project includes the development of a new information system to store the digital archives

of the local agencies of Cadastre. Annex I (sections 7.1.2.1, pages 69-80, 7.1.3.4.2, pages 126-127, and 7.1.4.7.2, pages 139-140) outlines the new electronic services related to the search and retrieval of files for external users and the internal administrator users of the Hellenic Cadastre across all regions in Greece, on the basis of a classification system, and a user helpdesk.

- Subproject 7B - Cadastre's improved digital services. The scope of the project includes the development of an Integrated Geospatial and Cadastral Information Management System to serve as a single point of entry for all Hellenic Cadastre's services and to interoperate with relevant systems, including the information system for the storage of archives to be developed under subproject 7A. This includes the development of the unified cadastre portal, to bring together all services and applications offered by the Hellenic Cadastre in a single-entry point. Annex I (sections 1.4.3 and 1.4.4, pages 89-96) list the various services to be offered to citizens, and professionals (i.e. notaries, lawyers, engineers), respectively. The scope of the project also includes the development of a communication hub i.e. a single, multi-channel point of contact for natural and legal persons (property owners and professionals such as notaries and lawyers), providing support and information concerning transactions carried out through all the services offered by the Cadastre. Annex I (sections 1, pages 70-88, and 1.3.7, pages 96-98) of the call for tender for the development of the Communication Hub details the system architecture and specifications for the development and operation of the communication hub.
- Subproject 8 - Digitisation of the archives of Maritime. Annex I (sections 3.1, pages 107-108, 2.2 and 2.3, pages 105-106) detail the new electronic services related to the search and retrieval of files, made easier through the implementation of a cataloguing and file categorization system. Lastly, Annex I (section 5.7 page 145) provides for helpdesk support services to system users. In addition to users of the Ministry of Maritime Affairs and Insular Policy whose work is expected to benefit from the new services and digital content, seafarers, audit authorities and companies are also expected to benefit from such services through a more efficient processing of their requests.
- Subproject 9: Secure Storage of Public Sector and "Broader" Public Sector. Annex I (section A3.2, pages 85-86) provides for the development of a digital platform to support users in the management of the physical archives. The platform will allow the digital registration of information regarding each physical archive (such as type, size, age, place of storage, owner entity) and extraction and classification of aggregate data on the basis of such parameters. Further, Annex I (section A.3.7.1, pages 90-91) outlines the services to be offered through the pilot project to the public administration users, such as the ability to electronically request and document the retrieval of a physical archive. The subproject aims at creating a more efficient public administration by reducing the time cost of providing relevant services to the public, including the time needed to locate a physical archive, hence also freeing up public sector resources.

The investment consists of the pilot implementation of secure storage of public sector and "broader" public sector archives

In line with the description of the measure and the requirements of the Council Implementing Decision, for subproject 9 Greece launched a call for competitive tender (as listed in the evidence section above), detailing the specifications for the pilot implementation for the model keeping of archives for secure storage of approximately 65 000 000 files (A5/A4/A3/A2/A1/A0) in other public sector archives. Specifically, the subproject aims to establish a secure and efficient system of physical archives, aligned with the relevant archival legislation and policy. The ultimate objective is

to safely and securely store such archives and to allow for easy archives retrieval, including for the purpose of digitisation. The said requirements for the pilot implementation of the subproject are detailed in Annex I (sections A.2 and A.3, pages 82-84, and sections A.3.4, A.3.5, A.3.6 and A.3.7, pages 87-90) and Annex II (section 5, page 107).

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 96	Related Measure: Towards Public Administration's "customer"-oriented services through simplification and improvement of processes, systems enhancements and compliance with European strategies and policies (Measure ID: 16929)	
Name of the Milestone: Set up of the national registry of procedures and implementation of national plan for process simplification (first phase)		
Qualitative Indicator: Report by the Ministry of Digital Governance attesting to the operationalisation of national registry of procedures and the completion of the work streams under the first phase of the National Programme of Process Simplification.		Time: Q3 2022
Context:		
<p>The objective of the reform is to improve the internal functioning of the public administration and the services it offers to citizens and businesses. The reform consists of the implementation of a medium-term strategy for the reduction of administrative burden and the creation of customer-centric services within the public administration and improvement of processes, systems enhancements, and compliance with European strategies and policies. This is achieved through the implementation of the National Programme for Process Simplification, which comprises of the simplification and digitalization of a broad range of processes such as in the areas of justice, business start-ups, and citizenship, in addition to the full set up of the Observatory for monitoring the impact of regulation and of the National Registry of Procedures.</p> <p>Milestone 96 requires the operationalisation of the National Registry of Procedures and its integration into the national digital gateway of the public administration (https://www.gov.gr), and the simplification and digitalisation of procedures under the first phase of the 4-year National Programme of Process simplification, including the digitalisation of public procurement procedures.</p> <p>Milestone 96 is the first step of the implementation of the reform 16929 'Towards Public Administration's "customer"-oriented services through simplification and improvement of processes, systems enhancements and compliance with European strategies and policies'. It will be followed by milestone 97 and milestone 98, related to the completion of all the simplification and digitalisation workstreams under the 4-year National Programme for Process Simplification, and the full set up of the Observatory for monitoring the impact of regulation and the National Registry of Procedures. The reform has a final expected date for implementation in Q4 2025.</p>		
Evidence provided:		
In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:		

- i. Summary note, duly describing the simplification actions and how these contribute to the objectives of the reform, with references to the parts of the National Policy Programme of Administrative Procedures which provide the relevant analysis and official references to published circulars
- ii. Copy of the adopted National Policy Programme of Administrative Procedures 2020-2024, which includes all the actions related to i) the National Programme for Process Simplification; ii) the National Registry of Administrative Procedures (MITOS); and iii) the Observatory for monitoring the impact of regulation, as approved on 3 March 2023 by the responsible Committee for process simplification under this National Programme comprising of high-level members across the Greek government, and published in the official government platform dedicated to the abovementioned policy programme (<https://diadikasies.gov.gr/ektheseis>)
- iii. Copy of the approval of the National Policy Programme of Administrative Procedures 2020-2024, signed by the members of the responsible Committee for process simplification comprising of high-level members across the government under this National Programme
- iv. Copy of the administrative act of the Deputy Minister of Digital Governance, digitally signed and issued on 17 March 2023 as per article 68 of Law 4961/2022, Official Journal A 146/27.07.2022, which amended article 90 of Law 4727/2020, Official Journal A 184/23.09.2020, declaring the operationalisation of the National Registry of Administrative Procedures (MITOS) and its integration into the national digital gateway of the public administration (<https://www.gov.gr>) (protocol No. 13650 ΕΞ 2023)

Analysis:

The justification and substantiating evidence provided by the Greece authorities covers all constitutive elements of the milestone.

In their request for payment, Greece made reference to the existence of a clerical error in the Council Implementing Decision Annex, with respect to the description of reform 16929 ‘Towards Public Administration’s “customer”-oriented services through simplification and improvement of processes, systems enhancements and compliance with European strategies and policies’. The part of the description of reform 16929 that concerns “the adoption of regulatory changes to establish a wide regulatory basis for the interconnection and interoperability of registries and services for data exchange between national public organizations in line with the new European Interoperability framework” has been erroneously included in the description of this reform. This part of the description of reform 16929 is in fact relevant only for reform 16782 ‘Interconnection and interoperability of registries, systems and services for data exchange between national public organisations’. This text is also included in milestone 98, which is the only milestone under reform 16782.

The Commission considers that this is a clerical error and has undertaken the assessment on this basis.

Operationalisation of the National Registry of Procedures (“Diavlos”, as per article 90 of Law 4727/2020), and integration into gov.gr portal

In line with the description of the milestone to operationalise the National Registry of Procedures and integrate it into gov.gr portal, the Deputy Minister of Digital Governance issued an administrative act on 17 March 2023, as foreseen by article 68 of Law 4961/2022. Through this act, the Greek authorities declared the registry is operational and has been integrated into the national

digital gateway of the public administration (<https://www.gov.gr>). Further, the Greek authorities adopted and published a National Policy Programme of Administrative Procedures 2020-2024. One of the three pillars of the abovementioned National Policy Programme of Administrative Procedures is this National Registry of Procedures. Specifically, the National Policy Programme of Administrative Procedures provides, inter alia, a timeline, actions, objectives and policy outcomes related to the operationalisation of this registry, in addition to a link to the registry (<https://mitos.gov.gr/>). All the relevant actions towards the establishment and operationalisation of the registry have been completed, and the registry is now fully operational. The registry constitutes a single point of reference, aiming to provide citizens and businesses with reliable and up-to-date information on the required documentation and administrative steps needed for all administrative procedures executed by the public administration, in a transparent and easily accessible manner.

The relevant legislative, administrative and technical actions taken leading to the operationalization of the registry are detailed in chapter II, sub-chapter A (pages 9-16) of the abovementioned policy programme. Specifically, the registry, named “Diavlos”, which was the name stipulated in the Council Implementing Decision Annex, was established in September 2020 as per article 90 of Law 4727/2020. The registry was later renamed to “Mitos”, following the adoption of article 68 of Law 4961/2022, which amended article 90 of Law 4727/2020. Following an initial pilot and testing phase, a comprehensive framework for the organisation and operation of the registry was legislated through the adoption of the said legislation, and the registry was integrated in the national digital gateway of the public administration (<https://www.gov.gr>) in December 2022. The registry constitutes a functional element of gov.gr, interoperating with gov.gr as regards the digital processes which are executed through the latter. The procedures uploaded in the registry are categorised according to thematic areas, such as ‘business activity’, ‘labour and social insurance’ and ‘education’, and are accessible to, and searchable by citizens and businesses. A list of all the procedures uploaded in the registry is provided in Annex II of the National Policy Programme of Administrative Procedures 2020-2024.

Completion of the first phase of the simplification work streams as per the timeline provided by the 4-year National Programme of Process Simplification, including the digitalisation of public procurement procedures

In line with the abovementioned milestone requirement, the Greek authorities simplified and digitalised the processes foreseen for the first phase of the National Programme of Process Simplification, in line with the provided timeline. Specifically, the National Programme of Process Simplification constitutes one of the three pillars of the National Policy Programme of Administrative Procedures 2020-2024, which was adopted and published on 3 March 2023. The said National Policy Programme of Administrative Procedures provides, inter alia, a timeline, actions, objectives and policy outcomes related to the National Programme for Process Simplification. The National Programme for Process Simplification consists of actions in relation to the simplification and digitalisation of processes across all policy areas of the public administration, along with the upgrades and functional enhancements of relevant systems necessary to support the efficient execution of the new digitalised processes. The timeline provided foresees the implementation of actions in three distinct phases, which span between 2020 and 2024 as follows: first phase: Q2 2020 – Q4 2022; second phase: Q1 2023 – Q4 2023; and third phase: Q1 2024 – Q4 2024. Specifically, the first phase foresees the implementation of simplification and digitalisation actions in the policy areas of transportation and logistics, justice, citizenship, social security, tourism, public procurement, shipping, health and social welfare, and public administration. In line with this timeline, the Greek authorities implemented by Q4 2022 all the relevant actions, as detailed in chapter II, sub-chapter

B of the Programme (pages 17-66). These actions aim to reduce the administrative burden and make administrative processes more accessible and user-friendly to citizens and businesses, as well as to facilitate the work of public servants and make them more efficient in the performance of their duties. At the same time, the improved processes feed into, and enhance the accessibility of processes available through the National Registry of Administrative Procedures and the national digital gateway of the public administration (<https://www.gov.gr>).

In particular, the description of simplification and digitalization initiatives that are related to the public procurement policy domain are elaborated in chapter II, sub-chapter B.4. of the Programme (page 45). These include the upgrade of the Central Electronic Register of Public Contracts (KIMDIS), including through enhanced interfaces with other systems, increased security, and improved accessibility for users to its database; the creation of the single certificate of judicial solvency which is issued and submitted digitally by business in their proposals for participation in public tenders (replacing 25 certificates previously needed and issued in paper by courts for the participation in public tenders); the simplification of the procedure for obtaining a digital signature in line with national legislation and the European Regulation e-IDAS, which is requirement for participation in public tenders; the digitalisation of other certificates frequently used in public tenders, such as the certificate of not bearing a debt towards the state (which consolidates the respective certificates for tax and social security debt), the certificate of white criminal record, the solemn declaration and authorisation, and the digital validation of the original signature borne by any kind of document or private agreement that needs to accompany the tender file.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 100	Related Measure: Modernise – Interoperability and web services development (Measure ID: 16779)	
Name of the Milestone: Contract award for interoperability and web services development project		
Qualitative Indicator: Notification of award of contract		Time: Q4 2022
<p>Context:</p> <p>The investment envisaged in this milestone is part of a set of measures that aim to address the challenge of modernising and digitalising the public administration, while streamlining and simplifying its key processes and procedures. This is done by improving the operational model of the public administration, improving the public administration’s digital performance, including through increased interoperability between systems and data.</p> <p>The objective of the investment (16779) is the development of a central interoperability infrastructure for the integrated services management of the public administration, and the development and provision of IT interfaces, which should facilitate information exchange among government agencies and the provision of interactive online services.</p> <p>Milestone 100 concerns of the award of the contract for the development project of interoperability and web services for the public administration. The Milestone requires that the Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA examines all the submitted proposals and confirms whether the applications properly address the request for proposal demands. Upon the selection of the appropriate contractor, the Ministry is required to proceed with a contract award, which defines the obligations, roles and responsibilities of both engagement parties.</p>		

Milestone 100 is the first step of the implementation of the investment (16779) on interoperability and web services development. It will be followed by milestone 108, related to the evaluation of the new functionalities of the interoperability and web services infrastructure. The investment has a final expected date for implementation in Q4 2024.

Evidence provided:

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

- i. Summary note;
- ii. Decision for the launch of the call for tender signed by the Managing Director of Projects of Information Society Société Anonyme on 1 December 2020, with protocol number 11539 and number of electronic upload on Diavgeia platform (ADA number) 20PROC007780080.
- iii. Contract award decision on “Development of Internet Services (Web Services) to achieve Interoperability between Public Administration Information Systems” Number 15430/06-09-2022.
- iv. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 9 September 2022.
- v. Report of the contracting authority, signed by the Managing Director of Projects of Information Society Société Anonyme on 9 May 2023, with protocol number 9946/09-05-2023 regarding the evaluation committee's assessment of the submitted applications against the call's demands, accompanied by an explanatory table and the minutes of the relevant meetings of the evaluation committee (No.5/3-12-2021 p.8-11 p. 76-79; No.12/18-02-2022 p. 5-8; No.18/1-09-2022 p. 5-11) signed by its members.

Analysis:

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

Award of the contract for interoperability and web services development project

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece notified the award of the contract for this project on 9 December 2022. This is demonstrated through the Decision of contract award by the contracting authority (as listed in the evidence section above).

The scope of the project as well the specifications that fulfil the CID Annex requirements are included in the sections of Annex I to the call for tender. In particular, the project consists in the development of specialised internet services for the information systems of the public administration bodies (i.e. “G2G” – Government to Government Web Services) which would ensure interoperability between them. As described in Annex I section 1.3.1 of the call for tender, which explains the scope of the investment project, making the IT systems of the public administration interoperable will enable and facilitate also the following:

- The transmission of data/information between State agencies (G2G), which is part of the development of e-Government services.
- The transmission of data/information between the public administration bodies and citizens, as well as businesses. This will allow the National Portal “gov.gr” to be strengthened by introducing and activating additional electronic services.

- The further development and provision of ‘services of common interest’ for the public administration bodies will allow upgrading significantly the existing electronic services provided by the public administration bodies.

The Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA shall examine all the submitted proposals and confirm whether the applications properly address the Request for Proposal’s demands

In line with the requirements of the Council Implementing Decision, Greece submitted a report by the contracting authority, as listed under the evidence provided, together with an explanatory table, confirming that the evaluation of the proposals was carried out in accordance with the required terms and specifications as set out in the call for tender. In addition, the authorities provided the minutes of the relevant meetings of the evaluation committee that took place, as per the provisions of the Greek law on public procurement (Law 4412/2016). These minutes include the conclusions of the evaluation committee following their assessment of proposals with respect to the call for tender demands, namely: i) the verification of the file completion of submitted proposals; ii) the assessment of technical proposals; iii) the assessment of financial proposals; iv) the verification and acceptance of the submitted documentation by the temporary contractor. With respect to these four elements, the minutes conclude that the applications for proposal properly address the demands of the call for tender.

Upon the selection of the appropriate external partner, the Ministry shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties

The Council Implementing Decision states that the “contract award [...] shall define the obligations, roles and responsibilities of both engagement parties”. However, in line with the public procurement procedure, it is not the act of contract award itself which defines the obligations, roles and responsibilities of the contracting authority and the contractor, but the tender documents, i.e. the Request for Proposals which is also referenced in the milestone, and with which the competition is launched. The evaluation of proposals as per the tender process is done on the basis of the relevant text included in the tender documents. The contract award itself, which represents the outcome of the evaluation of proposals based on the call for tender, refers to the tender procedure and hence makes reference to the documents containing the obligations. In light of the above, the technical details and the evidence that fulfils the aforementioned requirement are all included in the tender documents. In particular, the obligations, roles and responsibilities of both contract’s engagement parties, are included and detailed in the following sections of the call for tender: Chapter 4 (pp. 42-47) – 5 (pp. 47-53) – 6 (pp. 54-57) and Annex I (pp. 57-68). On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Furthermore, in line with the description of the measure, the call for tender incorporates the following requirements for the project:

- the implementation of internet services and their documentation*: it is covered in Annex I section A.2, which outlines the purpose and scope of the investment project, and section A.1.3, which provides details on the interventions foreseen under the digital policy framework in support of the digital transition.
- the integration of services in gov.gr*: it is covered in Annex I section A.3.2, which provides details on the implementation methodology of the project.

<ul style="list-style-type: none"> iii. <i>definition and performance of the required control tests</i>: it is covered in Annex I section A.3.1 which provides details on the technical specifications and technical requirements of the project. iv. <i>pilot operation of the web services</i>: it is covered in Annex I section A.3.2, which provides details on the implementation methodology of the project, including the all the different phases of implementation. v. <i>web services transfer into production (final implementation after the pilot phase)</i>: it is covered in Annex I section A.3.2, which provides details on the implementation methodology. vi. <i>support for new web services</i>: it is covered in Annex I section A.3.1 which provides the technical specifications and technical requirements of the project.
Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 101	Related Measure: Modernise – CRM for the General Government (Measure ID: 16810)	
Name of the Milestone: Contract award for CRM for the General Government		
Qualitative Indicator: Notification of award of contract		Time: Q4 2022
<p>Context:</p> <p>The investment envisaged in this milestone is part of a set of measures that aim to address the challenge of modernising and digitalising the public administration, while streamlining and simplifying its key processes and procedures. This is done by improving the operational model of the public administration, improving the public administration’s digital performance, including through increased interoperability between systems and data.</p> <p>The objective of the investment (16810) is the design, development, implementation and operation of an integrated system for managing the full lifecycle of Public Administration’s relationship with citizens and businesses. Such integrated system will upgrade the existing capacity of the Public Administration to monitor its interactions and transactions with citizens and businesses and utilize the information collected by the citizens and businesses in order to personalize the approach and promote a higher level of services.</p> <p>Milestone 101 concerns of the award of the contract for the CRM for the General Government project. The Milestone requires that the Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA examines all the submitted proposals and confirms whether the applications properly address the request for proposal demands. Upon the selection of the appropriate contractor, the Ministry is required to proceed with a contract award, which defines the obligations, roles and responsibilities of both engagement parties.</p> <p>Milestone 101 is the first step of the implementation of the CRM for the General Government investment (16810). It will be followed by milestone 109, related to the completion of the project. The investment has a final expected date for implementation in Q4 2024.</p>		
Evidence provided:		

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

- i) Summary note;
- ii) Decision for the launch of the call for tender signed by the Managing Director of Projects of Information Society Société Anonyme on 1 August 2022, with protocol number 13678/01-08-2022 (O.E. 04-08-2022), and number of electronic upload on Diageia platform (ADA number) 22PROC011062867 2022-08-05;
- iii) Decision of contract award by Executive Director of Information Society Société Anonyme of 29 December 2022 for the project: 'Planning, implementation, location and support of the production function of the Single Digital Infrastructure for the Service of Citizens and Enterprises (CRM)', registered with protocol number 23519/29-12-2022 and number of electronic upload on Diageia platform (ADA number) 9ΓΤΛ469Η4S-PBY);
- iv) Report of the contracting authority, signed by the Managing Director of Projects of Information Society Société Anonyme on 9 May 2023 with protocol number 9946/9-5-2023 regarding the evaluation committee's assessment of the submitted applications against the call's demands, accompanied by an explanatory table and the minutes of the relevant meetings of the evaluation committee, with number. No. 2 and No. 4 of 25 October 2022, No. 7 of 14 November 2022 and No. 9 of 16 December 2022, signed by its members.

Analysis:

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

Award of the contract for CRM for the General Government

In line with the description of the milestone and the requirements of the Council Implementing Decision, on 5 August 2022 Greece issued the Decision for the launch of the tender competition for the CRM for the General Government project. In line with the requirements of the Council Implementing Decision, the Greek authorities notified the award of the contract for this project on 29 December 2022. This is demonstrated through the issuance of the relevant decision by the contracting authority (Decision 23519/29-12-2022).

The scope of the project as well the specifications that fulfil the CID Annex requirements are included in the sections of Annex I of the call for tender.

The Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA shall examine all the submitted proposals and confirm whether the applications properly address the Request For Proposal (RfP) demands

In line with the requirements of the Council Implementing Decision, Greece submitted a report by the contracting authority, Information Society SA, with protocol number 9946/9-5-2023, together with an explanatory table, confirming that the evaluation of the proposals was carried out in accordance with the required terms and specifications as set out in the Request for Proposals (RfP). In addition, the authorities provided the minutes of the relevant meetings of the evaluation committee that took place, as per the provisions of the Greek law on public procurement (Law 4412/2016). These minutes include the conclusions of the evaluation committee following their assessment of proposals with respect to RfP demands, namely: i) the verification of the file completion of submitted proposals; ii) the assessment of technical proposals; iii) the assessment of financial proposals; iv) the verification and acceptance of the submitted documentation by the

temporary contractor. With respect to these four elements, the minutes conclude that the applications for proposal properly address the demands of the call for tender.

Upon the selection of the appropriate external partner, the Ministry shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties

The Council Implementing Decision states that the “contract award [...] shall define the obligations, roles and responsibilities of both engagement parties”. In practice, it is not the act of contract award itself which defines the obligations, roles and responsibilities of the contracting authority and the contractor, but the tender documents, i.e. the Request for Proposals which is also referenced in the milestone, and with which the competition is launched. The evaluation of proposals as per the tender process is done on the basis of the relevant text included in the tender documents. The contract award itself, which represents the outcome of the evaluation of proposals based on the call for tender, refers to the tender procedure and hence makes reference to the documents containing the obligations. In light of the above, the technical details and the evidence that fulfils the aforementioned requirement are all included in the tender documents. In particular, the obligations, roles and responsibilities of both contract's engagement parties, are included and detailed in the following sections of the call for tender: Chapter 4 (pp. 70-76) – 5 (pp. 77-81) – 6 (pp. 82-83) and Annex I (pp. 82-162). On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Furthermore, in line with the description of the measure, the call for tender incorporates the following requirements for the project:

The investment concerns the design, development, implementation and operation of an integrated system for managing the full lifecycle of Public Administration’s relationship with citizens and businesses. The project shall upgrade the existing capacity of the Public Administration to monitor its interactions and transactions with citizens and businesses. The system shall utilize the information collected by the citizens and businesses in order to personalize the approach and promote a higher level of services

Sections 1.3, 2.1 and 2.2 of Annex I to the Call for Tenders (Contracting Authority’s (Information Society SA) Decision Call for tenders, 13678/01-08-2022 (O.E. 04-08-2022 AΔAM: 22PROC011062867 2022-08-05) indicate that the objective of the investment is a cloud-based platform that will allow the creation and management of a complete customer profile (for citizens and businesses) in a unified centralized database accessible by all authorized public administrators. The platform will allow the creation of new services, with no or minimum software development, so as to speed up the launching of new services to citizens. The citizens will be able to submit their requests via multiple channels of communications (i.e. telephone, web, social media, sms) thus eliminating the need for their physical presence to the KEP offices. The scope includes interoperability services that will allow the interconnection of the CRM platform with other legacy and authentication systems operating today within the governmental sector.

The investment shall include: a) integration and interoperability services through the adoption of modern software design and development methodologies,

The technical specifications that fulfil this requirement of the measure description in the Council Implementing Decision have been included in paragraph 1.3, pg. 8 of the call for tender, where the scope of the programming contract is described, and under Annex I to the call for tender section 2.1,

item 1, pg. 95, section 4.2.5, pg. 115, section 5.1, pg. 125 and section 5.2, pg. 127, by including references to the interoperability with other systems.

The investment shall include: b) access to services supporting mechanism, which is a toolkit for the development of new applications based on low code technology

The technical specifications that fulfil this requirement of the measure description in the Council Implementing Decision have been included in paragraph 1.3, pg. 8 of the call for tender, where the scope of the programming contract is presented, and under Annex I to the call for tender, section 2.1, item 2, pg. 96, section 4.2.2, pg. 114 and under Annex II, Table 1.2 (A.1.13) (A.1.21), which describe the methodology/toolkits for app development purposes, by using low code technology.

The investment shall include: c) a Customer Relationship Management (CRM) platform, which will collect and manage all the data of the served citizens and will orchestrate the execution of business processes, regardless of the initiating service

The technical specifications that fulfil this requirement of the measure description in the Council Implementing Decision have been included in paragraph 1.3, pg. 8 of the call for tender, which outlines the scope of the programming contract, and under Annex I of the call for tender, section 2.1, item 4, pg. 96, sections 4.1.1. – 4.1.3., pg. 104-106, sections 4.1.5. – 4.1.7., pg. 106-108, where the development of a CRM platform is presented.

The investment shall include: d) a Citizens' consensus management system for access to electronic services & Contact Centre Services, through which the service of citizens and businesses is carried out with the use of traditional channels, such as call centres, but also utilizing modern channels, such as Web Forms, Social Media, Messaging Apps, Teleconference App

The technical specifications that fulfil this requirement of the measure description in the Council Implementing Decision have been included in paragraph 1.3, pg. 8 of the call for tender, by referring to the scope of the programming contract, and under Annex I, section 2.1, item 5, item 8, pg. 96, section 2.2 pg. 97, sections 4.1.3, 4.1.4, pg. 106, section 4.1.7 pg. 108, section 4.3.3, pg. 118, section 4.3.5, pg. 121, section 6.7, pg. 149 and Annex II, tables 1.9, 1.10, which mention the development of a Citizens' consensus management system, as well as of a Contact Centre Platform.

The investment shall include: e) Upgrading of the Digital Platform of KEP and its connection with the unified citizen case management system, call centre and gov.gr

The technical specifications that fulfil this requirement of the measure description in the Council Implementing Decision have been included in paragraph 1.3, pg. 8 of the call for tender, where the scope of the programming contract is summarized, and under Annex I, section 2.1, item 9, item 10, pg. 96, section 4.1, pg. 103, section 4.2.5, pg. 115, section 4.3.2, pg. 117, which present relevant information regarding the upgrade of the Digital Platform of KEP and its connection with other platforms.

The investment shall include: f) Simplification and improvement of the processes and services related to physical presence of “customers” with the expansion of the existing myKEPLive infrastructure and its integration with a system for scheduling physical presence appointments. The implementation of the investment shall be completed by 31 December 2024

The technical specifications that fulfil this requirement of the measure description in the Council Implementing Decision have been included in paragraph 1.3, pg. 8 of the call for tender, which provides information about the scope of the programming contract and under Annex I, section 2.1,

item 9, pg. 96, section 3.2, pg. 101, section 4.1 pg. 103, section 4.1.1 pg. 104, section 4.2.1 pg. 113, which include references related to a more simplified and improved physical presence of “customers”.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 102	Related Measure: Modernise – Further Modernisation of Public Administration’s One-Stop Shops (Measure ID: 16780)	
Name of the Milestone: Contract award for Further Modernisation of Public Administration’s One-Stop Shops		
Qualitative Indicator: Notification of award of contract		Time: Q4 2022
<p>Context:</p> <p>The investment envisaged in this milestone is part of a set of measures that aim to modernise and digitalise the public administration, while streamlining and simplifying its key processes and procedures. This is done by improving the public administration’s digital performance, including through the modernisation of the administration’s One-Stop-Shops. The objective of the investment is the upgrading of the IT infrastructure and peripherals in the public administration’s One-Stop-Shops. This is done through the acquisition and installation of new teleconferencing equipment and new applications.</p> <p>Milestone 102 concerns the award of the contract for the modernisation of public administration’s One-Stop Shops. The Milestone requires that the Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA examines all the submitted proposals and confirms whether the applications properly address the request for proposal demands. Upon the selection of the appropriate contractor, the Ministry is required to proceed with a contract award, which defines the obligations, roles and responsibilities of both engagement parties.</p> <p>Milestone 102 is the first step of the implementation of the investment on modernisation of public administration’s One-Stop Shops. It will be followed by milestone 110, related to the acquisition of IT equipment including PCs/printers/tablets used for the electronic signature process, systems for queue management and smart notification, feedback terminals, evaluation platform and mobile applications. The investment has a final expected date for implementation in Q4 2024.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. Summary note ii. Certification by the Ministry of Digital Governance/Information Society on the compliance of the contracts/contract awards with Request for Proposal’s demands (Reference Number 289/26.10.2023), accompanied by two supporting Annexes: <ul style="list-style-type: none"> • Guidance on the submission of proposals for actions under the project ‘Modernisation of One-Stop Shops’ by Greek municipalities • Audit list and Audit Report of the Independent Auditor. 		

On the basis of the investment being implemented by municipalities through 462 contracts/award decisions, the following documentary evidence for each contract/award decision was requested:

- iii. A list of unique identification numbers, each representing one of the 462 contracts/award decisions signed by the respective municipalities
- iv. A randomly selected sample of 60 contracts/award decisions was drawn, for which Greece submitted the relevant contracts/award decisions, and where needed, additional documentation (i.e. the relevant call for tender or the relevant offers by private providers) listing the number and type of IT equipment to be purchased.

Analysis:

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

Award of the contract for the modernisation of Public Administration’s One-Stop Shops. Upon the selection of the appropriate external partner, the Ministry shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties.

The implementation method for this project has been partly modified compared to the initial design, which envisaged a central procurement through the Ministry of Digital Governance/Information Society. The process has been decentralised at the local-government level, with municipalities procuring and purchasing the IT-equipment for their One-Stop Shops (i.e. Citizen Service Centres of the public administration). Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the decentralisation of the implementation of the project is related to the internal procedures of the Member State. As of this, the minimal deviation does not change the nature of the measure and does not affect the progress towards the achievement of the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

The IT equipment is purchased by the municipalities either through direct awards or tender procedures, depending on the estimated value of the contract. The Annex to the summary note contains a table setting out details for 462 contracts/award decisions signed by the municipalities, as follows:

- The table includes a unique identification number, which corresponds to the official protocol number assigned to each contract/award decision when it is uploaded in the ‘Central Electronic Public Procurement Registry’ (KHMDHS). As per national legislation (Law 4412/2016) all documents uploaded to KHMDHS are final and legally binding.
- For each signed contract/award decision the table includes information on the quantities and type of the IT-equipment to be purchased, namely which equipment is purchased from the categories listed in the completion milestone 110.
- For those cases where the signed contract/award decision does not explicitly indicate the quantities and type of equipment to be purchased, the table contains also the official protocol number of the documentation that contains this information i.e. the relevant call for tender or the relevant offers by private providers.

The check of the sample by the Commission on 9 November 2023 confirmed the validity of the information provided by the authorities. Specifically, for each of the contracts/award decisions within the sample, the unique identification number and the respective municipality were cross-

referenced to the annexed table provided by the authorities. In addition, the content of the contracts/award decisions (or the relevant offers by private providers / calls for tender) was checked to ensure that they indeed include the quantities and type of the IT-equipment required, as well as define the obligations, roles and responsibilities of both engagement parties.

The evidence provided for a sample of 60 contracts/award decisions confirmed that the municipalities finalised the contracts/award decisions for the purchase of the IT-equipment required for the modernisation of the One-Stop-Shops and thereby that the requirements of the milestone have been met.

In accordance with the contracts/award decisions signed, it is expected that the further modernisation of Public Administration’s One-Stop Shops will be completed in 2024, as the acquiring of PCs/printers/tablets used for the electronic signature process, of systems for queue management and smart notification, of feedback terminals, evaluation platform & mobile application is completed in line with the forthcoming milestone 110.

The Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA shall examine all the submitted proposals and confirm whether the applications properly address the Request for Proposal’s demands

While the procurement process for this investment was decentralised, as explained above, the Ministry of Digital Governance/Information Society coordinated and checked the implementation of the investment at the central level. In particular, municipalities have received centralised guidance on the technical specifications for their tenders from the Ministry (as listed in the evidence). Greece submitted a Certification by the Ministry of Digital Governance/Information Society confirming that the award decisions/contracts signed, properly address the guidance and technical specifications provided centrally, and therefore the Request for Proposal’s demands. The Certification of the Ministry also indicates that independent auditors have further checked that the tenders and the contracts have been executed according to the specifications and the requirements laid down in the guidance, and this is confirmed by the supporting audit report listed in the evidence provided.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 103	Related Measure: Modernise – New system for Public Procurements (Measure ID: 16736)	
Name of the Milestone: Contract award for New system for Public Procurements		
Qualitative Indicator: Notification of award of contract		Time: Q4 2022
Context:		
<p>The objective of the investment is to redesign and implement a new IT system for public procurement. The investment consists of the digitalisation and integration of the entire business and functional life-cycle of public procurement, the upgrade of the interoperability services, the integration of advanced public procurement techniques and tools as digital services (eShops and eMarketplaces), and ICT support for the National Centralized Health Procurement Authority (EKAPY). Specifically, it includes: a) the redesign and enrichment of the portal www.eprocurement.gov.gr; b) extensive additions and customizations subsystems used for tenders;</p>		

c) the reform, rearrangement and enrichment of Central Electronic Register of Public Procurement (KIMDIS), upgrading and expansion of statistical data extraction systems and their further statistical processing; d) the Configuration and implementation of Electronic Public Procurement System (ESIDIS) extensions to support new strategies and business processes in the field of Public Procurement by electronic means; e) the enhancements of the already implemented interoperability services and implementation of new ones for data exchange; f) Electronic interoperability services with gov.gr, CAs, banking organizations for integration of possibilities of digital signature of electronic documents and other data using the system and ensuring "non-repudiation"; g) the implementation of a data encryption mechanism stored in the system databases to prevent malicious actions of ESIDIS and G-Cloud administrators; h) a new security study and additions and or changes to the system to increase its security, certification and interventions to enhance the security of the system in order to be certified by an independent security assessment; i) the improvement and re-launch the procurement planning system for wider support of public procurement and centralized procurement procedures using electronic catalogues; j) the addition of applications for support of economic operators: enrichment of applications for search of tenders, historical and statistical data of their involvement in procurement processes, enrichment of information and communication subsystems of suppliers and contracting authorities, ticketing system for asking questions and reporting issues-resolution or help desk tool; k) the addition of Virtual Assistant capabilities so that anyone interested can ask questions in natural language; l) the addition of an electronic file archiving system (ESIDIS - KIMDIS) that complies with the provisions of the legal framework for electronic files; m) the production of training material and publicity actions; n) technical support and project monitoring services; o) a study evaluating the possibilities and effectiveness of existing e-procurement tools and selection or upgrade or replacing them with new and more efficient ones; p) Building Information Modelling (BIM); and q) ICT Support for the National Centralized Health Procurement Authority (EKAPY).

Milestone 103 requires the award of the contract for this project. The relevant Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA is required to examine all the submitted proposals and confirm whether the applications properly address the Request for Proposal (RfP) demands. Upon the selection of the appropriate contractor, the responsible body shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties.

Milestone 103 is the first step of the implementation of the investment and it will be followed by milestone 119, related to the completion of the new system for Public Procurements all its substituent elements. The investment has a final expected date for implementation in Q4 2025.

Evidence provided:

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

- i. Summary note;

For subproject 1, 'Support and upgrading of the Public Procurement System':

- ii. Decision for the launch of the call for tender signed by the Managing Director of Information Society Société Anonyme on 16 January 2023, with protocol number 781/16-01-2023 and number of electronic upload on Diavegia platform (ADA number) 23PROC012017817.

- iii. Contract award decision on “Support and upgrading of the Public Procurement System” Number 8583/24-04-2023.
- iv. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 24 April 2023.
- v. Report of the contracting authority, signed by the Managing Director of Information Société Anonyme on 9 May 2023, with protocol number 9946/09-05-2023 regarding the evaluation committee's assessment of the submitted applications against the call's demands, accompanied by an explanatory table and the minutes of the relevant meetings of the evaluation committee (No.4/12-03-2023 p.2-3; No.14/22-03-2023 p. 8-9; No.17/26-03-2023 p. 3-4; No.22/11-04-2023 p.2-4) signed by its members.

For subproject 2, “Design and Development of a new system for electronic public procurement for the support of a fully digital public procurement lifecycle”:

- vi. Decision for the launch of the call for tender signed by the Managing Director of Information Society Société Anonyme on 3 February 2023, with protocol number 2390/03-02-2023 and number of electronic upload on Diavgeia platform (ADA number) 23PROC012104167.
- vii. Contract award decision on “Design and Development of a new system for electronic public procurement for the support of a fully digital public procurement lifecycle” Number 23725/08-11-2023.
- viii. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 8 November 2023.
- ix. Report of the contracting authority, signed by the Managing Director of Information Société Anonyme on 9 November 2023, with protocol number 23863/09-11-2023 regarding the evaluation committee's assessment of the submitted applications against the call's demands, accompanied by an explanatory table and the minutes of the relevant meetings of the evaluation committee (No.10/28-04-2023 p. 2-3; No.19/09-06-2023 p. 38-40; No.21/30-10-2023 p. 9-10; No.22/31-10-2023 p. 7-8; No. 29/07-11-2023 p. 6-7) signed by its members.

For Subproject 3, ‘ Development of an Integrated Information System for Management of Technical Works and Resources of the Ministry of Infrastructure and Transport’, which includes a Building Information Modelling (BIM) tool:

- i. Decision for the launch of the call for tender issued by the General Secretariat for Infrastructure, of the Ministry of Infrastructure and Transport, on 28 April 2023, with number of electronic upload on Diavgeia platform (ADA number) 23PROC012573676.
- ii. Contract award decision on “Development of an Integrated Information System for Management of Technical Works and Resources of the Ministry of Infrastructure and Transport” Number Δ11/301532.
- iii. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 10 October 2023.
- iv. Report of the contracting authority, signed by the alternate Head of the Directorate for Public Procurement under the General Secretariat for Infrastructure, of the Ministry of Infrastructure and Transport, on 23 October 2023, with protocol number Δ11/316757 regarding the evaluation committee's assessment of the submitted applications against the call's demands, accompanied by the minutes of the relevant meetings of the

evaluation committee (No.189889/13-07-2023, p.6-15; No.189889/19-07-2023 p.1-3; No.189889/08-09-2023 p.2-4) signed by its members.

For Subproject 4, 'Horizontal interventions for the digital transformation of bodies of the Ministry of Health', section 5 on ICT support for the National Centralized Health Procurement Authority (EKAPY):

- v. Decision for the launch of the call for tender signed by the Chair of the Board of Directors and Executive Directors of the Electronic Governance of Social Insurance Société Anonyme, on 31 March 2023, with protocol number 3228 and number of electronic upload on Diavegia platform (ADA number) 23PROC012409444.
- vi. Contract award decision on "Development of an Integrated Information System for Management of Technical Works and Resources of the Ministry of Infrastructure and Transport" Number 2495.
- vii. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 25 October 2023.
- viii. Report of the contracting authority, signed by the Head of Department, Directorate for Planning and Management of Works, of the Electronic Governance of Social Insurance Société Anonyme on 25 October 2023, with protocol number 10385 regarding the evaluation committee's assessment of the submitted applications against the call's demands, accompanied by the minutes of the relevant meetings of the evaluation committee (No. 1/11.05.2023 p.2-6; No.2/01.06.2023 p.10-22; No. 11/13.10.2023 p.3-8; No. 12/23.10.2023 p.3-9) signed by its members.

Analysis:

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

Award of the contract for the project new system for Public Procurement

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece notified the award of the four contracts which, taken together, cover all the elements of the investment. This is demonstrated through the issuance of the relevant decisions of contract award by the respective contracting authorities (as listed in the evidence section above). Specifically, the dates for the notification are as follows:

- Subproject 1: 24 April 2023
- Subproject 2: 8 November 2023
- Subproject 3: 10 October 2023
- Subproject 4: 25 October 2023

The Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA shall examine all the submitted proposals and confirm whether the applications properly address the Request for Proposal demands

In line with the requirements of the Council Implementing Decision, Greece submitted a report by the contracting authority, as listed under the evidence provided, together with an explanatory table, confirming that the evaluation of the proposals was carried out in accordance with the required terms and specifications as set out in the call for tender. In addition, the authorities provided the minutes of the relevant meetings of the evaluation committee that took place, as per the provisions

of the Greek law on public procurement (Law 4412/2016). These minutes include the conclusions of the evaluation committee following their assessment of proposals with respect to the call for tender demands, namely: i) the verification of the file completion of submitted proposals; ii) the assessment of technical proposals; iii) the assessment of financial proposals; iv) the verification and acceptance of the submitted documentation by the temporary contractor. With respect to these four elements, the minutes conclude that the applications for proposal properly address the demands of the call for tender.

Upon the selection of the appropriate contractor, the responsible body shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties.

The Council Implementing Decision states that the “contract award [...] shall define the obligations, roles and responsibilities of both engagement parties”. In practice, it is not the act of contract award itself which defines the obligations, roles and responsibilities of the contracting authority and the contractor, but the tender documents, i.e. the Request for Proposals which is also referenced in the milestone, and with which the competition is launched. The evaluation of proposals as per the tender process is done on the basis of the relevant text included in the tender documents. The contract award itself, which represents the outcome of the evaluation of proposals based on the call for tender, refers to the tender procedure and hence makes reference to the documents containing the obligations. In light of the above, the technical details and the evidence that fulfils the aforementioned requirement are all included in the tender documents. In particular, the obligations, roles and responsibilities of both contract's engagement parties, are included and detailed in the relevant sections of the respective calls for tender, as follows:

- Subproject 1, ‘Support and upgrading of the Public Procurement System’: Sections 4-6 (pages 67-80) and Annex I (section 1.1, pages 82-84)
- Subproject 2, ‘Design and Development of a new system for electronic public procurement for the support of a fully digital public procurement lifecycle’: Sections 4-6 (pages 72-87) and Annex I (section 1.1, pages 88-90)
- Subproject 3, ‘Development of an Integrated Information System for Management of Technical Works and Resources of the Ministry of Infrastructure and Transport’, which includes a Building Information Modelling (BIM) tool: Sections 4-6 (pages 64-80), Annex I (section 1.1, page 80) and Annex XII (pages 261-270)
- Subproject 4, ‘Horizontal interventions for the digital transformation of bodies of the Ministry of Health’, section 5 on ICT support for the National Centralized Health Procurement Authority (EKAPY): Sections 4-6 (pages 94-112), and Annex I (pages 84 and 198)

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

The scope of project and its constitutive elements, as well the specifications that fulfil the CID Annex requirements are included in the respective sections of the respective calls for tender launched, as follows:

The investment shall include: a) the redesign and enrichment of the portal www.eprocurement.gov.gr;

The specifications of the call for tender for subproject 1 include actions to support and upgrade the Public Procurement System (ESIDIS), by adding extensions and upgrading the individual applications

and subsystems, in order to facilitate the smooth transition to the design and implementation of the new Public Procurement System (N-ESIDIS) under subproject 2, which will support the full lifecycle of public procurement processes. These specifications include the visual redesign and enrichment of the portal www.eprocurement.gov.gr, as well as the introduction of new capabilities and improvements to the already existing functionalities, as detailed in subproject 1, Annex I, paragraph, 6.4.1.1, page 120, and in subproject 2, Annex I, paragraph, 4.14, pages 139-147.

The investment shall include b) extensive additions and customizations subsystems used for tenders;

The specifications of the calls for tender for subprojects 1 and 2 include additions and customizations subsystems that will be used for tenders. Specifically, the services for the upgrade, implementation of extensions and adaptations of the ESIDIS and N-ESIDIS subsystems, including for the maintenance of registries and of an electronic public contract file by the contracting authorities, are described in subproject 1, Annex I, paragraph 6.4, pages 119-120 and in subproject 2, Annex I, paragraph 4.9, page 132, and paragraph 4.12-4.13, pages 137-138.

The investment shall include c) the reform, rearrangement and enrichment of Central Electronic Register of Public Procurement (KIMDIS), upgrading and expansion of statistical data extraction systems and their further statistical processing;

The specifications of the calls for tender for subprojects 1 and 2 include the reconfiguration and enhancement of the Central Electronic Register of Public Procurement (KIMDIS) and the upgrading and expansion of statistical data extraction functionalities, through the upgrade of functional units and subsystems of KIMDIS and the further integration and data exchange with the tender and contract execution system. These are described in subproject 1, Annex I, paragraph 6.4.1.2, pages 120-122, as well as in subproject 2, Annex I, paragraph 4.16 pages 151-154.

The investment shall include d) the Configuration and implementation of Electronic Public Procurement System (ESIDIS) extensions to support new strategies and business processes in the field of Public Procurement by electronic means;

The specifications of the calls for tender for subprojects 1 and 2 include the configuration and implementation of ESIDIS extensions. This element is presented in subproject 1, Annex I, paragraph 6.4.1.4, pages 122-124, which analyzes the additions and support mechanisms that aim to facilitate users and increase the system's efficiency.

The investment shall include e) the enhancements of the already implemented interoperability services and implementation of new ones for data exchange;

The specifications of the calls for tender for subprojects 1 and 2 include the enhancements of the already implemented interoperability services and the implementation of new ones for data exchange between the relevant ESIDIS and N-ESIDIS applications and third-party systems, and the use of the central government cloud to host the data. The said specifications are described in subproject 1, Annex I, paragraph 3.2, pages 97-98, paragraph 4.6, page 101, and paragraph 6.4.1.2.2, page 121, as well as in subproject 2, Annex I, paragraph 3.3.3, page 114, paragraph 4.15, pages 147-151, and paragraph 4.16.5, page 154.

The investment shall include f) Electronic interoperability services with gov.gr, Certification Authorities (CAs), banking organizations for integration of possibilities of digital signature of electronic documents and other data using the system and ensuring "non-repudiation";

The specifications of the calls for tender for subprojects 1 and 2 include the electronic interoperability services with gov.gr, with Certification Authorities (CAs) that offer digital signature validation services, and with banking organizations that provide non-repudiation services, by assuring that the sender of information (economic operator who takes part in tenders) is provided with proof of delivery, and the recipient (contracting authority) is provided with proof of the sender's identity, so neither can later deny having the information. This element is presented in subproject 1, Annex I, paragraph 6.4.1.4.3 pages 123-124, and in subproject 2, Annex I, paragraph 4.15.5, pages 150-151.

The investment shall include g) the implementation of a data encryption mechanism stored in the system databases to prevent malicious actions of ESIDIS and G-Cloud administrators;

The specifications of the calls for tender for subprojects 1 and 2 include the implementation of a data encryption mechanism to support security validation processes so as to prevent malicious actions of ESIDIS and G-Cloud administrators, as described in subproject 1, Annex I, paragraph 1.2.8, pages 90-92, and paragraph 6.4.1.4.1.4, page 123, as well as in subproject 2, Annex I, paragraph 4.4.2, page 122.

The investment shall include h) a new security study and additions and/or changes to the system to increase its security, certification and interventions to enhance the security of the system in order to be certified by an independent security assessment;

The specifications of the calls for tender for subprojects 1 and 2 include additions and/or changes to the system to increase its security, such as the enhanced requirements for authentication and authorization services for all electronic services provided by the N-ESIDIS, which will be analysed and certified through the security study. The said requirements are analyzed in subproject 1, Annex I, paragraph 6.4.2.1.6.2, page 131, and in subproject 2, Annex I, paragraph 4.16.3, pages 153-154, paragraph 4.22 pages 159-161, and paragraph 6.6, pages 169-171.

The investment shall include i) the improvement and re-launch the procurement planning system for wider support of public procurement and centralized procurement procedures using electronic catalogues;

The specifications of the call for tender for subproject 2 include a new system architecture for the improvement and re-launch the procurement planning system to support processes in centralised and non-centralised procurement, including through electronic catalogues and other advanced tools and digital services (eShops and eMarketplaces). The said requirements and are covered by Annex I, paragraph 3.1, pages 110-112, and paragraphs 4.10.1,4.10.2 and 4.10.3, pages 132-134.

The investment shall include j) the addition of applications for support of economic operators: enrichment of applications for search of tenders, historical and statistical data of their involvement in procurement processes, enrichment of information and communication subsystems of suppliers and contracting authorities, ticketing system for asking questions and reporting issues-resolution or help desk tool;

The specifications of the calls for tender for subprojects 1 and 2 include the addition of applications to support economic operators. More specifically, Annex I of subproject 1, paragraph 4.7, page 101, and Annex I of subproject 2, paragraph 1.2.1, pages 91-92, paragraphs 4.12-4.13, pages 137-138, paragraphs 4.14, pages 139-146, paragraph 4.16.2, page 153, paragraph 6.4.4 page 168, paragraph 6.5, page 169 and paragraph 6.11.4, pages 177-180 outline the enhancement of applications and subsystems for the search of tenders and available statistical information and data from closed and ongoing procurement procedures for contracting authorities (through a content management

system and search engine optimisation), and also for the ability for suppliers to ask questions and receive assistance through multichannel communication.

The investment shall include k) the addition of Virtual Assistant capabilities so that anyone interested can ask questions in natural language;

The specifications of the call for tender for subprojects 2 include the addition of Virtual Assistant capabilities as an indispensable part of the unified portal, and are covered in Annex I, paragraph 4.14.5, pages 144-147.

The investment shall include l) the addition of an electronic file archiving system for the public procurement system and public procurement registry (ESIDIS - KIMDIS) that complies with the provisions of the legal framework for electronic files;

The specifications of the calls for tender for subprojects 1 and 2 include the addition of an electronic file archiving system (ESIDIS - KIMDIS). More specifically, subproject 2, Annex I, paragraph 4.9, page 132, provides a detailed description of the ESIDIS – KIMDIS archiving system that fully complies with the legal provisions relevant to electronic files.

The investment shall include m) the production of training material and publicity actions;

The specifications of the calls for tender for subprojects 1 and 2 include the production of training material (including videos and graphics) and publicity actions for the public procurement system. These are covered in subproject 1, Annex I, paragraph 6.4.3, page 134, as well as in subproject 2, Annex I, paragraph 6.7, pages 171-172 and paragraph 6.10, pages 174-175.

The investment shall include n) technical support and project monitoring services;

The specifications of the calls for tender for subprojects 1 and 2 elaborate on the technical support and project monitoring services to be offered in the context of the project. Subproject 1, Annex I, paragraph 6.1.2.3 page 108, and paragraph 8, pages 141-142, as well as subproject 2, Annex I, paragraphs 6.11.2-6.11.4, pages 176-180, and paragraph 7, pages 183-185, detail the implementation methodology, the project monitoring and other relevant support services for the software infrastructure and for the platforms utilised for the implementation of the system.

The investment shall include o) a study evaluating the possibilities and effectiveness of existing e-procurement tools and selection or upgrade or replacing them with new and more efficient ones;

The specifications of the calls for tender for subprojects 1 and 2 include consultation services and a study for the upgrade and replacement of current e-procurement tools. These requirements are presented in subproject 1, Annex I, paragraphs 6.4, pages 119-120, and 6.4.2.1.6.2, page 131, and in subproject 2, Annex I, paragraphs 1.2.1-1.2.2 pages 91-103, paragraphs 2.2-2.3 page 109, and paragraphs 6.2-6.3, pages 165-166, which outline the current status and IT infrastructure and processes to be analysed and improved, the progressive and dynamic design and implementation of the new system to reap further improvements, as well as the purpose, objectives and benefits of the project.

The investment shall include p) Building Information Modelling (BIM);

The specifications of the calls for tender for subproject 3 include the development of a Building Information Modelling (BIM) tool, that is, an information model to generate and manage digital representations of the physical and functional characteristics for buildings and infrastructures used in the design, procurement and monitoring of implementation of public works. Specifically, Annex I

of subproject 3 (sections 2.1, page 87, 4.12, pages 134-137, 4.13, pages 137-138, and 7.2, page 161) and Annex II (Table B, page 175) outline the development of system for managing geospatial data, which is expected to facilitate the make use of the data included in the BIM models, the specifications for a subsystem for the management of BIM models (3-dimensional BIM viewer), and its functional requirements.

The investment shall include q) ICT Support for the National Centralized Health Procurement Authority (EKAPY)

The specifications of the call for tender for subproject 4 concern the procurement of IT software and the provision of all necessary services for installation, configuration, interconnection and operation support of the Integrated Information System of the regional health centres of the Ministry of Health and the National Central Health Procurement Authority (EKAPY). Specifically, Annex I of subproject 4 (section 7.1.5, pages 248-310) outlines the scope, design and objectives of the project, the Enterprise Resource Management system (including a financial management/accounting module and supplier management module) to be developed in in all regional health centres and EKAPY, the implementation of new processes in EKAPY to improve its operational performance, the implementation of a unified codification system for health products and services, the development of support applications and upgrading of EKAPY’s technological and physical infrastructure and internet portal, the required services to be offered and the helpdesk/ticketing support for users, the interoperability requirements with the central procurement systems, the creation of a subsystem for strategy planning and support of central procurement by EKAPY, and the development of a product, services and suppliers registry and a subsystem for monitoring suppliers’ contracts, and user training.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 104	Related Measure: Modernise – Cybersecurity strategy and policies for the Public Sector & advanced security services for national critical infrastructures (Measure ID: 16823)	
Name of the Milestone: Contract award for Cybersecurity strategy		
Qualitative Indicator: Notification of award of contract		Time: Q4 2022
<p>Context:</p> <p>The investment envisaged in this milestone is part of a set of measures that aim to modernise and digitalise the public administration, while streamlining and simplifying its key processes and procedures. This is done by improving the public administration’s digital performance, including through the implementation of advanced cybersecurity policies.</p> <p>The objective of the investment is the development and implementation of a cybersecurity strategy and a set of cybersecurity policies, which aim to increase the reliability and security of public sector systems and data. The investment and the resulting system reform further aim to improve cybersecurity and limit the threats to the public sector’s central infrastructures and the information systems that operate through it.</p> <p>Milestone 104 concerns the award of the contract for the project cybersecurity strategy and policies for the public sector and advanced security services for national critical infrastructures. The</p>		

Milestone requires that the Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA examines all the submitted proposals and confirms whether the applications properly address the request for proposal demands. Upon the selection of the appropriate contractor, the Ministry is required to proceed with a contract award, which defines the obligations, roles and responsibilities of both engagement parties.

Milestone 104 is the first step of the implementation of the investment on the cybersecurity strategy and related policies. It will be followed by milestone 112, related to implementation of changes in terms of processes and procedures regarding cybersecurity, and the establishment and making operational the National Security Operations Centre (SOC) in line with the new Strategy. The investment has a final expected date for implementation in Q4 2024.

Evidence provided:

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

- i. Summary note;
- ii. Decisions for the launch of the call for tender signed by the Center for Technological Support Development and Innovation (KETYAK):
 - For subproject 1 “Cybersecurity strategy and policies for the public sector” on 27 January 2023 with protocol number 4/27-01-2023
 - For subproject 2 on “Advanced security services for national critical infrastructure” on 6 April 2022 with protocol number 17/06-04-2022
- iii. Contract award decisions: for subproject 1 on 24 April 2023 Number 504/24-04-2023; for subproject 2 on 13 April 2023 Number 466/13-04-2023.
- iv. Contracts with the selected company: for subproject 1 of 23 June 2023; for subproject 2 of 30 June 2023.

The authorities also provided:

- Copy of the Specific Regulation on Public Procurement (838/69/9557/84/27-07-2021).

Analysis:

The justification and substantiating evidence provided by the Greek authorities covers all constitutive elements of the milestone. The authorities indicated that the substantiating evidence, due to the confidential nature of the documentation concerned, is subject to the provisions of the Specific Regulation on Public Procurement (838/69/9557/84/27-07-2021) applied by the Center for Technological Support Development and Innovation (KETYAK).

Award of the contract for the project cybersecurity strategy and policies for the Public Sector, and for advanced security services for national critical infrastructure

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece issued a contract award decision for subproject 1 on 24 April 2023, and for subproject 2 on 13 April 2023. This is demonstrated through the Decisions of contract award by the contracting authority (as listed in the evidence section above).

The scope of the project as well the specifications that fulfil the CID Annex requirements are included for subproject 1 in the section 1, paragraph 1.3 and Annex I, sections 1 and 2, paragraphs 1.1 and 2

in the relevant call for tender; for subproject 2 in section 1, paragraph 1.3 and Annex I, Sections 1 and 2, paragraphs 1.1, 2.1, 2.2, 2.3. In particular:

- Subproject 1 consists in the development of a cybersecurity strategy and policies for the public sector, that integrates with the Governmental Security Operations Centre for cybersecurity and the corresponding implementation roadmap. The cybersecurity strategy for the public sector is further developed taking into account existing National Cybersecurity Strategy.
- Subproject 2 consists in the provision of advanced security services for national critical infrastructures. In particular, the subproject entails the implementation and supporting services for the National Security Operations Centre (SOC) through the provision of physical infrastructures, hardware, software and educational services (see further details below).

Upon the selection of the appropriate external partner, the Ministry shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties

The Council Implementing Decision states that the “contract award [...] shall define the obligations, roles and responsibilities of both engagement parties”. However, in line with the public procurement procedure, it is not the act of contract award itself which defines the obligations, roles and responsibilities of the contracting authority and the contractor, but the tender documents, i.e. the Request for Proposals which is also referenced in the milestone, and with which the competition is launched. The evaluation of proposals as per the tender process is done on the basis of the relevant text included in the tender documents. The contract award itself, which represents the outcome of the evaluation of proposals based on the call for tender, refers to the tender procedure and hence makes reference to the documents containing the obligations. In light of the above, the technical details and the evidence that fulfils the aforementioned requirement are all included in the tender documents. In particular, the obligations, roles and responsibilities of both engagement parties, are included and detailed in the following sections of the call for tender: for subproject 1 in Annex VI (pages 77-86), for subproject 2 in Annex VI (pages 178-193).

Furthermore, in line with the description of the measure on “*the implementation of the National Cybersecurity Operations Centre (SOC)*”, the call for tender for subproject 2 (section 1, paragraph 1.3 and Annex I, sections 1 and 2, paragraphs 1.1, 2.1, 2.2, 2.3) incorporates the following requirements for the project:

- Fully functional and staffed Government Cyber Security Operations Centre (gSOC) with the necessary hardware and software installed;
- A fully functional National Computer Emergency Response Team, staffed with the specially trained personnel;
- Fully operational and appropriately staffed mini-Cybersecurity Operations Centres (mini-SOCs) in each supported Government Agency;
- Fully operationally functional interconnection of the Electronic Attack Response Team with corresponding national authorities of other States, international organizations, for the early warning of cyber threats;
- Fully functional Central Security Incident Reporting System;
- Transfer of know-how as well as hardware infrastructure for the operation of the gSOC, ensuring technical support for the uninterrupted operation of the systems.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 105	Related Measure: Modernise – Digital skills upgrade programs for conscripts (Measure ID: 16826)
Name of the Milestone: Contract award for Digital skills upgrade programs for conscripts	
Qualitative Indicator: Notification of award of contract	Time: Q4 2022
<p>Context:</p> <p>The measure aims to capitalise on the conscripts' time in service to impart the digital skills needed in today's armed forces and labour market, by providing a training program and certification for digital skills as part of their mandatory military service. The implementation of this investment shall be carried out through the upgrade and expansion of the platform of the Digital Academy of Citizens and shall include: a) Personalized access of conscripts to the training portal which shall have strong cybersecurity mechanisms and deterrence of cyber-attacks, along with enhanced personal data protection architecture b) Configuration of the electronic portfolio (e-portfolio) of the conscript in which his educational profile will be reflected along with his existing qualifications c) Development and configuration of digital skills training programs d) Development and use of a self-assessment tool e) 50 000 tablets that shall be acquired and supplied to conscripts for the time of attending the distance learning programs, and e) certification of digital skills acquired during the training process which shall be based on European and national digital skills frameworks.</p> <p>Milestone 105 is the first step of the implementation of the investment and requires the award of the contract for the training program. It is followed by target 118, related to the training of 150 000 conscripts through the Digital Skills Upgrade programme. The investment has a final expected date for implementation in Q2 2025.</p>	
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. Summary note; ii. Decision of Call for tenders for the project: <i>'Implementation of the training software and provision of training services for the design and operation of the Army Digital Skills Laboratory'</i> signed by the Managing Director of Projects of Information Society Société Anonyme on 5 April 2023, with protocol number 6650/30-03-2023 (O.E. 05-04-2023), and number of electronic upload on Diageia platform (ADA number) 23PROC012445214 2023-04-05; iii. Decision of contract award by Executive Director of Information Society Société Anonyme of 25 September 2023, registered with protocol number 19793/21-09-2023 and number of electronic upload on Diageia platform (ADA number) RTG469H4S-00); iv. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) of 25 September 2023; v. Report of the contracting authority, signed by the Managing Director of Projects of Information Society Société Anonyme on 26 September 2023, with protocol number 20107/26-09-2023 regarding the evaluation committee's assessment of the submitted applications against the call's demands, accompanied by the minutes of the relevant meetings of the evaluation committee (Participation minutes No 11/17-07-2023 p. 47-48; Technical Offer minutes No 11/17-07-2023 p. 48-49; Financial Offer minutes No 13/30-07-2023 p. 8-12; Award minutes No 16/18-09-2023 p. 10) signed by its members. 	

Analysis:

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

Award of the contract for the Digital skills upgrade programs for conscripts.

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece notified the award of the contract for this project on 25 September 2023. This is demonstrated through the Decision of Contract Award by the contracting authority (as listed in the evidence section above).

The scope of the project as well the specifications that fulfil the CID Annex requirements are included in the sections of Annex I to the call for tenders (Contracting Authority's (Information Society SA) Decision Call for tenders, 6650/30-03-2023, 23PROC012445214 2023-04-05). In particular, the project consists in the implementation of training software and the provision of training services for the design and operation of the 'Army Digital Skills Laboratory'. As described in Annex I section A.1.4 of the call for tenders, the scope of the investment project concerns the use of military service in such a way that soldiers are able to upgrade their digital skills and obtain relevant certifications, which they can use both during their term of office and above all during their professional career and development. This should lead to:

- Operational interconnection of military service with Modern Technology Developments and the Labour Market.
- Enhancing the Digital Preparedness of the Armed Forces by upgrading the digital skills of soldiers.
- Enhancing the professional and personal development of soldiers in the Digital Age.
- Create a new concept for the time of military service.
- Increasing the attractiveness of military service.

The Ministry shall examine all the submitted proposals and confirm whether the applications properly address the Request for Proposal's (RFP) demands.

In line with the requirements of the Council Implementing Decision, Greece submitted a report by the contracting authority, Information Society SA, with protocol number 20107/26-09-2023, confirming that the evaluation of the proposals was carried out in accordance with the required terms and specifications as set out in the Request for Proposals (RfP). In addition, the authorities provided the minutes of the relevant meetings of the evaluation committee that took place, as per the provisions of the Greek law on public procurement (Law 4412/2016). These minutes include the conclusions of the evaluation committee following their assessment of proposals with respect to RfP demands, namely: i) the verification of the file completion of submitted proposals; ii) the assessment of technical proposals; iii) the assessment of financial proposals; iv) the verification and acceptance of the submitted documentation by the temporary contractor. With respect to these four elements, the minutes conclude that the applications for proposal properly address the demands of the call for tender.

Upon the selection of the appropriate external partner, the Ministry shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties.

The Council Implementing Decision states that the "contract award [...] shall define the obligations, roles and responsibilities of both engagement parties". However, in line with the public

procurement procedure, it is not the act of contract award itself which defines the obligations, roles and responsibilities of the contracting authority and the contractor, but the tender documents, i.e. the Request for Proposals which is also referenced in the milestone, and with which the competition is launched. The evaluation of proposals as per the tender process is done on the basis of the relevant text included in the tender documents. The contract award itself, which represents the outcome of the evaluation of proposals based on the call for tender, refers to the tender procedure and hence makes reference to the documents containing the obligations. In light of the above, the technical details and the evidence that fulfils the aforementioned requirement are all included in the tender documents. In particular, the obligations, roles and responsibilities of both contract's engagement parties, are included and detailed in the following sections of the call for tender: Chapter 4 (pp. 70-78) – 5 (pp. 79-86) – 6 (pp. 87-91) and Annex I (pp. 92-107). On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

The purpose shall be to capitalise on the conscripts' time in service to impart the digital skills needed in today's armed forces and labour market. The implementation of this investment shall be carried out through the upgrade and expansion of the platform of the Digital Academy of Citizens and shall include:

- a) *Personalized access of conscripts to the training portal which shall have strong cybersecurity mechanisms and deterrence of cyber-attacks, along with enhanced personal data protection architecture:* it is covered in Annex III section A.3.1 of the call for tenders, which outlines the requirements and technical specifications of the project and in Annex IX table 4, which defines the specifications of the Learning Management System;
- b) *Configuration of the electronic portfolio (e-portfolio) of the conscript in which his educational profile will be reflected along with his existing qualifications:* it is covered in Annex IX table 4, which defines the specifications of the Learning Management System;
- c) *Development and configuration of digital skills training programs:* it is covered in section 1.3.1, which outlines the purpose and scope of the digital upskilling program during military service, Annex I section A.1.4, which defines the skills to be acquired through training programs offered, and Annex III section A.3.1, which covers training programs including requirements, design and implementation;
- d) *Development and use of a self-assessment tool:* it is covered in Annex I section A.1.4, which concerns the creation of self-assessment material, Annex I section A.3, which outlines the design of training programs including a description of Self-Assessment Tools and Techniques, and Annex IX table 4, which defines the specifications of the Learning Management System (i.e., support of self-assessment processes);
- e) *50 000 tablets that shall be acquired and supplied to conscripts for the time of attending the distance learning programs:* it is covered in section 1.3.1 on the "Subject matter of the Framework Agreement", which concerns the procurement of up to 50 000 mobile tablets, and Annex IX table 5, which defines the tablets specifications (i.e., screen size, memory, storage capacity);
- a) *Certification of digital skills acquired during the training process which shall be based on European and national digital skills frameworks:* it is covered in section 1.3.1 on the "Subject matter of the Framework Agreement", Annex I section A.1.4, which defines the skills to be acquired and certified, Annex I section A.2 and Annex III section A.3.1 on the "Requirements and Technical Specifications", which also concern the provision of certification services.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 106	Related Measure: Modernise – Digital transformation of the Ministry of Foreign Affairs (Measure ID: 16742)
Name of the Milestone: Contract award for Digital transformation of the Ministry of Foreign Affairs	
Qualitative Indicator: Notification of award of contract	Time: Q4 2022
Context: <p>The investment envisaged in this milestone is part of a set of measures that aim to modernise and digitalise the public administration, while streamlining and simplifying its key processes and procedures. This is done by improving the public administration's digital performance, including through the digital transformation of the Ministry of Foreign Affairs.</p> <p>The objective of the investment is to modernise the Ministry of Foreign Affairs (MFA), through extended digitalization of its operations and IT infrastructures. The investment includes measures that aim at standardising Ministry's processes; supporting Ministry's wide scope of work; ensuring direct access to information; establishing an archival database and information centre; and upgrading the crypto IT and telecommunications security infrastructure.</p> <p>Milestone 106 concerns of the award of the contract for the projects related to the digital transformation of the Ministry of Foreign Affairs. The Milestone requires that the Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA examines all the submitted proposals and confirms whether the applications properly address the request for proposal demands. Upon the selection of the appropriate contractor, the Ministry is required to proceed with a contract award, which defines the obligations, roles and responsibilities of both engagement parties.</p> <p>Milestone 106 is the first step of the implementation of the investment on the digital transformation of the Ministry of Foreign Affairs. It will be followed by milestone 114, related to the completion of this investments, which includes the implementation of: the Strategic and Operational Planning support system; the digitization of the Diplomatic and Historical Archives; the Global Digital Information Centre Platform, and the modernisation of crypto IT & Telecom security infrastructure. The investment has a final expected date for implementation in Q2 2025.</p>	
Evidence provided: <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none">i. Summary noteii. Decisions for the launch of the calls for tender signed by the Managing Director of Projects of Information Society Société Anonyme:<ul style="list-style-type: none">○ For Sub-Project 1 "Strategic Support System and Operational Planning of the Ministry of Foreign Affairs" on 24-11-2022, with protocol number 20393/18-11-2022 and number of electronic upload on Diavgeia platform (ADA number) 22PROC011666205.○ For Subproject 2 "Digitisation of Diplomatic and Historical Archive of the Ministry of Foreign Affairs" on 29-12-2022, with protocol number 23170/23-12-2022 and	

number of electronic upload on Diavgeia platform (ADA number) 22PROC011922463.

- For Sub-project 3 "World Digital Information Centre Platform" on 28-11-2022, with protocol number 20452/21-11-2022 and number of electronic upload on Diavgeia platform (ADA number) 22PROC011683667.
 - For Subproject 4 "Modernisation of IT and Encrypted Telecommunications Security Infrastructures " on 09-03-2023, with protocol number 4406/03-03-2023 and number of electronic upload on Diavgeia platform (ADA number) 23PROC012261644.
- iii. Contract award decisions: for subproject 1: Number 6042/23-03-2023; for subproject 2: Number 8948/27-04-2023; for subproject 3: Number 8043/13-04-2023; for subproject 4: Number 10935/18-05-2023.
- iv. Notification of contract award decision from the Central Electronic Public Procurement Registry (ESIDIS) for subproject 1 on 24-03-2023; for subproject 2 on 28-04-2023; for subproject 3 on 13-04-2023; for subproject 4 on 19-05-2023.
- v. Reports of the contracting authority, signed by the Managing Director of Projects of Information Society Société Anonyme regarding the evaluation committee's assessment of the submitted applications against the call's demands, accompanied by an explanatory table and the minutes of the relevant meetings of the evaluation committee, in detail:
- For Subproject 1
 - From 20-01-2023 to 01-02-2023 (reference number: 2162/02-02-2023)
 - From 06-02-2023 to 12-02-2023 (reference number: 2961/13-02-2023)
 - On 24-02-2023 (reference number: 3913/24-02-2023)
 - From 20/06-03-2023 to 13-03-2023 (reference number: 5150/14-03-2023)
 - For subproject 2:
 - On 10-02-2023 (reference number: 2962/13-02-2023)
 - From 11-02-2023 to 27-02-2023 (reference number: 5081/13-03-2023)
 - On 16-03-2023 (reference number: 5414/16-03-2023)
 - On 17-03-2023 (reference number: 5566/20-03-2023)
 - On 31-03-2023 (reference number: 7096/04-04-2023)
 - From 02-04-2023 to 18-04-2023 (reference number: 8321/20-04-2023)
 - For subproject 3:
 - From 08-02-2023 to 08-03-2023 (reference number: 4773/09-03-2023)
 - From 17-03-2023 to 19-03-2023 (reference number: 5589/20-03-2023)
 - From 01-04-2023 to 05-04-2023 (reference number: 7384/06-04-2023)
 - For subproject 4:
 - On 07-05-2023 (reference number: 9739/08-05-2023)
 - On 09-05-2023 (reference number: 9965/10-05-2023)
 - On 15-05-2023 (reference number: 10566/16-05-2023)

Analysis:

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

Award of the contract for digital transformation of the Ministry of Foreign Affairs

In line with the description of the milestone and the requirements of the Council Implementing Decision, Greece notified the award of the contract for subproject 1 on 24-03-2023, for subproject

2 on 28-04-2023, for subproject 3 on 13-04-2023, for subproject 4 on 19-05-2023. This is demonstrated through the Decision of contract award by the contracting authority (as listed in the evidence section above).

The scope of the project as well the specifications that fulfil the CID Annex requirements are included in the Chapter 1 and Annexes I and II of the relevant calls for tender. In particular, the investment is divided into 4 sub-projects:

- Subproject 1: "Strategic Support System and Operational Planning of the Ministry of Foreign Affairs"
- Subproject 2: "Digitisation of Diplomatic and Historical Archive of the Ministry of Foreign Affairs"
- Subproject 3: "World Digital Information Centre Platform".
- Subproject 4: "Modernisation of IT and Encrypted Telecommunications Security Infrastructures "

The Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA shall examine all the submitted proposals and confirm whether the applications properly address the RFP demands

In line with the requirements of the Council Implementing Decision, Greece submitted a report by the contracting authority, as listed under the evidence provided, together with an explanatory table, confirming that the evaluation of the proposals was carried out in accordance with the required terms and specifications as set out in the call for tender. In addition, the authorities provided the minutes of the relevant meetings of the evaluation committee that took place, as per the provisions of the Greek law on public procurement (Law 4412/2016). These minutes include the conclusions of the evaluation committee following their assessment of proposals with respect to the call for tender demands, namely: i) the verification of the file completion of submitted proposals; ii) the assessment of technical proposals; iii) the assessment of financial proposals; iv) the verification and acceptance of the submitted documentation by the temporary contractor. With respect to these four elements, the minutes conclude that the applications for proposal properly address the demands of the call for tender.

Upon the selection of the appropriate external partner, the Ministry shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties

The Council Implementing Decision states that the "contract award [...] shall define the obligations, roles and responsibilities of both engagement parties". In practice, it is not the act of contract award itself which defines the obligations, roles and responsibilities of the contracting authority and the contractor, but the tender documents, i.e. the Request for Proposals which is also referenced in the milestone, and with which the competition is launched. The evaluation of proposals as per the tender process is done on the basis of the relevant text included in the tender documents. The contract award itself, which represents the outcome of the evaluation of proposals based on the call for tender, refers to the tender procedure and hence makes reference to the documents containing the obligations. In light of the above, the technical details and the evidence that fulfils the aforementioned requirement are all included in the tender documents. In particular, the obligations, roles and responsibilities of both contract's engagement parties, are included and detailed in the calls for tender listed in the evidence and further detailed below. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Furthermore, in line with the description of the measure, the calls for tender incorporate the following requirements for the project:

a) *the standardization of MFA's processes, which shall ensure Strategic and Operational Planning (SOP) viability and, consequently, its success.*

- For Subproject 1 this requirement is covered in sections 1.3 pg. 8 -11, and Annex I (Chapter 2, pg. 96-101; Chapter 4, pg. 108-115; Chapter 6, pg. 81) of the call for tender. The sections in the tender documentation listed above specify that the project includes: (a) the elaboration of a series of studies, in regard to the detailed recording and redesign of the Strategic and Operational Planning; (b) a web-based, workflow, monitoring, evaluation and reporting Platform for the Strategic and Operational Plan of the Ministry of Foreign Affairs; (c) the supply of the hardware and software for the operation of the above information systems.

b) *contributing to the wider promotion of the MFA's scope of work and the best possible use of its resources by aligning them with its pursued objectives.*

- For Subproject 1 this requirement is covered in sections 1.3, pg. 8 -11, Annex I (Chapter 1, Paragraphs 1.2.1 – 1.2.4, pg. 86-95; Chapter 2, pg. 96-101; Chapter 7, pg. 136-150), Annex II (pg. 151-157) of the call for tender. These sections in the tender documentation detail further the type of studies envisaged on the implementation of Strategic and Operational Planning.
- For Subproject 2 this requirement is covered in sections 1.3 pg. 10-14, Annex I (Section 2 pg. 93-98; Section 5 pg. 125-132; Section 6 Chapters 6.2 – 6.6 pg. 134-152; Section 7 pg. 152-166), Annex II (pg. 183-215) of the call for tender. These sections in the tender documentation specify the required equipment (hardware and software) for the operation of selected information systems.
- For Subproject 3 this requirement is covered in sections 1.3, pg. 11-14-15, Annex I (Chapter 1, paragraphs 1.3, 1.4, 1.5, pg. 97-102, Chapter 2, pg. 105-108, Chapter 4, pg. 114, Chapter 5, pg. 115 -117, Chapter 7, pg. 129 – 142) of the call for tender. These sections in the tender documentation specify that the scope of the subproject includes: equipment for the Digital Information Centre; a media collection and digital recording and decommissioning system; a user, content & application management platform; content collection, evaluation and documentation services.
- For Subproject 4 this requirement is covered in sections 1.3, pg. 08-10, Annex I (Chapter 1, paragraphs 1.1.3, 1.1.4, 1.2, pg. 78-82; Chapter 2, pg. 82-83; Chapter 2, paragraphs 2.2.2 pg. 84-85; Chapter 2, paragraphs 2.2.3-2.2.5 pg. 87 -98; Chapter 2, paragraphs 2.2.4-2.2.7 pg. 2.2.4-2.2.7) of the call for tender. These sections in the tender documentation specify the required upgrades of the encrypted IT and telecommunications security infrastructure of the Ministry.

c) *ensuring direct access to information, in the fastest possible time frame, by incorporating semantic search support, based on state-of-the-art artificial intelligence tools.*

- For Subproject 2 this requirement is covered in sections 1.3 pg. 10-14, Annex I (Section 3 pg. 98-105; Section 4 106-124; Section 6, Chapter 6.1 pg. 132-134; Section 7, Chapters 7.2 – 7.3 pg. 157-164) of the call for tender. These sections in the tender documentation specify that the digitization of the Ministry's archives is to be achieved by introducing a business tool to extract data by using AI Machine Learning technics.

- For Subproject 3 this requirement is covered in sections Annex I (Chapter 4, pg. 114; Chapter 5, paragraph 5.1, pg. 115 -117), Annex II (Compliance Tables 1 - 3.2 pg. 164 – 208) of the call for tender. These sections in the tender documentation specify that the scope of the subproject includes: central equipment for the digital information centre; a system for collection, recording and management of unbundling global media.

d) *creating an accessible and important archival database and information centre for effective administrative duties and cover the requirements of the MFA to enable it to more efficiently exercise public and economic diplomacy.*

- For Subproject 3 this requirement is covered in Annex I (Chapter 5, paragraph 5.2, pg. 117 - 119; Chapter 7, pg. 129 -142), Annex II – Compliance Tables 3.3 - 4 pg. 208 – 215) of the call for tender. These sections in the tender documentation specify that the scope of the subproject includes: a User Management Platform, Content & Content Distribution Applications; collection, evaluation, translation management and content documentation services; journalistic content analysis services.

e) *upgrading the crypto IT and telecommunications security infrastructure of the Ministry of Foreign Affairs, in the framework of its digital transformation.*

For Subproject 4 this requirement is covered Chapter 1.3, pg. 8 -10, in Annex I (Section 2.1, pg. 81-82; Section 2.2, pg. 83; Section 2.2.8.3, pg. 101-103; Section 2.2.8.4, pg. 104; Section 2.2.9.2, pg. 106; Section 2.2.9.3, pg. 106; Section 2.2.9.4 – 2.2.9.7, pg. 106 – 108) of the call for tender. These sections in the tender documentation specify that the scope of the subproject includes the modernization of structured cabling and active network equipment, the integration of communication in the Ministry of Foreign Affairs and the implementation of a classified teleconferencing system.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 107	Related Measure: Modernise – ERegistries (Measure ID: 16824)	
Name of the Milestone: Contract award for E-Registries		
Qualitative Indicator: Notification of award of contract		Time: Q4 2022
Context:		
<p>The objective of this investment is the establishment of interoperability and interfaces between the existing registers of the central public administration bodies, as well as the collection and expansion of registers in order to gradually lead to the smooth and proper operation of digital public services, using interconnected, up to date registers containing cleaned data entries.</p> <p>Milestone 107 concerns the facilitation of the collection and expansion of existing registers, in one central source, in order to gradually lead to the smooth and proper operation of digital public services. Milestone 107 should include the following four points: i) data in one place: the registries shall be accessible through one interface and shall be searchable ii) up-to-date data: all the data in registers shall be up-to-date and ready to use. Each register shall be accessed via a common API. iii) clean data: by the end of the project the data of the registers shall be clean at the best level possible,</p>		

and procedures and policies for clean data shall be in place iv) linked registries: interoperability shall be ensured.

Milestone 107 is the first step of the implementation of the investment, and it will be followed by milestone 120, related to the completion of the E-registries project. The investment has a final expected date for implementation in Q4 2025.

Evidence provided:

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

- i. Summary document
- ii. Decision for the launch of the tender competition(s)
 - For subproject 1 “Development of Registers and Digital Services for the new framework for the welfare of pet animals (National Register of Pet Animals – EMZS)” with Ref. No. 13029 on 22 July 2022 of Information Society SA (ΚτΠ Μ.Α.Ε.) with ADAM number 22PROC011017255 2022-07-28
 - For subproject 2 “Development of Value-Added Services of the Citizen Registry” with Ref. No. 205 on 05 January 2023 of Information Society SA (ΚτΠ Μ.Α.Ε.) with ADAM number 23PROC011972784 2023-01-11
 - For subproject 3 “Design, Consolidation and Support of the Operation of IDIKA SA Registries in the Health and Social Security Sector” with Ref. No. 15348 on 28 December 2022 of e-Government Center for Social Security (IDIKA S.A.) with number of electronic upload in Diageia (ADA number) ΨΣΛΑ4691B5-EN7.
- iii. Copy of decision of contract awards:
 - Decision of contract award by Executive Director of Information Society Société Anonyme for the subproject 1 “Development of Registers and Digital Services for the new framework for the welfare of pet animals (National Register of Pet Animals – EMZS)”, on 13 December 2022, with protocol number 22167 and number of electronic upload in Diageia ADA number: 98YN469H4Σ-5P5.
 - Decision of contract award by Executive Director of Information Society Société Anonyme for the subproject 2 “Development of Value-Added Services of the Citizen Registry”, on 13 April 2023, with protocol number 8044 and number of electronic upload in Diageia ADA number: P007469H4Σ-BM4.
 - Decision of contract award by e-Government Center for Social Security (IDIKA S.A.) on 12 May 2023, with protocol numbers 2434 and 2435 for the two components under subproject 3 “Design, Consolidation and Support of the Operation of IDIKA SA Registries in the Health and Social Security Sector” with ADA numbers: 6ΘN74691B5-8ΞΤ and 6NXO4691B5-IA2 respectively.
- iv. Copy of the programme agreement contract:
 - The contract between the Ministry of Infrastructure and Transport, the Ministry of Digital Governance the National Technical University of Athens, regarding the project “Register of Infrastructures and E-Mobility Market Operators (M.Y.F.A.H.)”, was signed by Ministers of Infrastructure and Transport and Digital Governance, on behalf of the Greek authorities and the Vice Dean of the National Technical University of Athens, on 18 April 2022, with protocol number 737.

- v. Print screen of the electronic public procurement platform:
- For subproject 1 “Development of Registers and Digital Services for the new framework for the welfare of pet animals (National Register of Pet Animals – EMZS)”, notification of contract award message was sent to all bidders on 14 December 2022.
 - For subproject 2 “Development of Value-Added Services of the Citizen Registry”, notification of contract award message was sent to all bidders on 13 April 2023.
 - For subproject 3 “Design, Consolidation and Support of the Operation of IDIKA SA Registries in the Health and Social Security Sector”, notification of contract award message was sent to all bidders on 12 May 2023 for both two subprojects of the framework agreement.
- vi. Report of the contracting authority, regarding the evaluation committee’s assessment of the submitted applications against the call's demands, accompanied by an explanatory table and the minutes of the relevant meetings of the evaluation committee, signed by its members for the 3 subprojects.
- For subproject 1 and 2, the report is signed by the Managing Director of Projects of Information Society Société Anonyme on 09 May 2023, with protocol number 9946;
 - For subproject 3, the report is signed by the senior Director of the Directorate for planning and project management of e-Government Center for Social Security (IDIKA S.A.) on 08 May 2023, with protocol number 4611.

For each of the 3 subprojects the minutes concern i) the verification of the file completion; ii) the assessment of technical proposals; iii) the assessment of financial proposals; iv) the verification and acceptance of the submitted documentation by the temporary contractor.

- For subproject 1 (pets registry), the minutes are provided in No.2/17.10.2022 for i), No.3/18.10.2022 for ii), No.8/03.11.2022 for iii), No.12/25.11.2022 for iv), respectively.
- For subproject 2 (citizens registry), the minutes are provided in No.2/28.02.2023 i) No.8 /16.03.2023 for ii), No.10 /24.03.2023 for iii) and No.16/05.04.2023 for iv), respectively.
- For subproject 3 (health and social security registry), the minutes are provided in No 2/20.02.2023 for component 1 and No. 3/24.04.2023 for component 2 for i), No. 4/03.03.2023 for component 1 and No.5/06.03.2023 for component 2 for ii), No.8/24.04.2024 for both component 1 and 2 for iii), No.11/08.05.2023 for component 1 and No.12 / 08.05.2023 for component 2 for iv), respectively.

The authorities also provided:

- i) A copy of Law 4710/2020, which was published in the Official Gazette No. 142 A of 23 July 2020, indicating the obligation of the Charge Point Operators and Electric Mobility Providers to register to the national database of ID Registration Organizations (IDRO).
- ii) A copy of Joint Ministerial Decision No. 355033/2021, which was published in the Official Gazette No. 5777 B on 10 December 2021, defining the “management and transmission of data related to the operation of the electric market, the points of recharging of electric vehicles and the access rights to the Register of Infrastructure and Electricity Market Bodies (M.Y.F.A.H.) of the interested parties”.
- iii) Ministerial Decision Ref. No. 373451 of 23 December 2021 (ADA: 6ΛΓΔ465XΘΞ-E7O) for subproject 4 “Register of Infrastructures and E-Mobility Market Operators (M.Y.F.A.H.)”,

which determines the framework of the agreement between the Ministry of Infrastructure and Transport and the National Technical University of Athens.

- iv) Ministerial Decision Ref. No 351958 of 10 November 2022 (ADA: 638Y465XΘΞ-YOA) was also provided, modifying the terms of the initial contract (regarding the trilateral planning contract).

Analysis:

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

This measure is implemented through four subprojects concerning the following e-registries:

- Subproject 1: “Development of Registers and Digital Services for the new framework for the welfare of pet animals (National Register of Pet Animals – EMZS)”
- Subproject 2: “Development of Value-Added Services of the Citizen Registry”
- Subproject 3: “Design, Consolidation and Support of the Operation of IDIKA SA Registries in the Health and Social Security Sector”
- Subproject 4: “Register of Infrastructures and E-Mobility Market Operators (M.Y.F.A.H.)”

Award of the contract for the E-Registries project

In line with the description of the milestone, the Greek authorities have notified the award of the contract for subprojects 1, 2 and 3. This is demonstrated through the decision of contract award by the contracting authority on:

- 13 December 2022 for subproject 1
- 13 April 2023 for subproject 2
- 12 May 2023 for subproject 3

For subproject 4, the programme agreement contract was signed on 18 April 2022.

The Ministry/ General Secretariat of Information Systems for Public Sector/ Information Society SA shall examine all the submitted proposals and confirm whether the applications properly address the Request for Proposal (RFP) demands

In line with the requirements of the Council Implementing Decision, the evidence that confirms the abovementioned requirement for each of the four different registries is detailed below:

- For subprojects 1 and 2, the reports by the contracting authority confirm that the evaluation of the proposals was carried out in accordance with the required terms and specifications as set out in the Request for Proposals (RfP) for each of the subprojects, together with an explanatory table.
- *For subproject 3*, the report notifies the completion of the stages of the i) evaluation-marking of the technical offers; ii) evaluation of the financial offers; iii) evaluation of the submitted documentation by the temporary contractor, in accordance with the content and the terms of the call, as also indicated in the minutes of the Tender Evaluation Committee that Greece has provided.
- *For subproject 4*, Greece assigned the development of this subproject, concerning the development of the e-vehicles registry, directly to the National Technical University of Athens (NTUA), through the signature of a programme agreement signed between NTUA with the Ministry of Infrastructure and Transport and the Ministry of Digital Governance.

This took place without any tender procedure by ‘the Ministry/General Secretariat of Information Systems for Public Sector/ Information Society SA’, or any ‘submitted proposal’ or an ‘RFP’ for this part of the project. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, a derogation from the procedures dictated by Greek public procurement law is permissible (given that the said agreement is concluded on the basis of Article 12 (Public contracts between public sector bodies) par. 4 of Law 4412/2016, which reiterates the provisions of Art. 12 (4) of Directive 2014/24)). Further, this constitutes a binding contract between the participating contracting authorities/parties, which aims at ensuring the provision of public services, for which they are responsible, with the view to achieving their common objectives. As of this, this minimal deviation does not affect the progress towards achieving the investment that the milestone represents, as it concerns internal procedures of Greece. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Regarding subprojects 1, 2 and 3, in addition to the report by the contracting authority, the authorities provided the minutes of the relevant meetings of the evaluation committee that took place for each of the three subprojects, as per the provisions of the Greek law on public procurement (Law 4412/2016). These minutes include the conclusions of the evaluation committee following their assessment of proposals with respect to RfP demands, namely i) the verification of the file completion of submitted proposals; ii) the assessment of technical proposals; iii) the assessment of financial proposals; iv) the verification and acceptance of the submitted documentation by the temporary contractor. With respect to these four elements, the minutes conclude that the applications for proposal properly address the demands of the call for tender.

Upon the selection of the appropriate external partner, the Ministry shall proceed with a contract award which shall define the obligations, roles and responsibilities of both engagement parties

The Council Implementing Decision states that the “contract award shall define the obligations, roles and responsibilities of both engagement parties”. In line with the public procurement procedure, it is not the act of contract award itself which defines the obligations, roles and responsibilities of the contracting authority and the contractor, but the tender documents, i.e. the Request for Proposals which is also referenced in the milestone, and with which the competition is launched. The evaluation of proposals as per the tender process is done on the basis of the relevant text included in the RfP. The contract award itself, which represents the outcome of the evaluation of proposals based on the RfP, refers to the RfP and hence makes reference to the documents containing the obligations. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

In light of the above, the evidence that fulfils the aforementioned requirement for each of the three different registries is detailed below:

- *For subproject 1*, the obligations, roles and responsibilities of the contracting authority and the contractor are defined in the tender document, specifically in Annex I.1.1 “Stakeholders in the implementation of the project scope”.
- *For subproject 2*, the obligations, roles and responsibilities of the contracting authority and the contractor are defined in the tender document in Annex I.1.1 “Parties involved in the implementation of the Contract”.
- *For subproject 3*, the obligations, roles and responsibilities of the contracting authority and the contractor are defined in the tender document for the two Components of the project, specifically in Annex I Section 2.1.1.1.1 “Organizational Structure and Staffing of the Entity”,

Section 3.2. "Project Team Roles and Staffing - Management Structure" and 4.3 "Terms of execution of the Framework Agreement".

As regards *subproject 4*, given that the contract was awarded through direct assignment as described in the assessment above, the obligations, roles and responsibilities of both engagement parties are defined in the programme agreement signed between the Greek authorities (i.e. Ministry of Infrastructure and Transport, Ministry of Digital Governance) and the National Technical University of Athens:

- This agreement constitutes a binding contract, as per the provisions of Article 12 par. 4 of Law 4412/2016, between the participating contracting authorities/parties, which aims at ensuring the provision of public services, for which they are responsible, with the view to achieving their common objectives. The rights and obligations of the contracting parties are stipulated in Article 6 of the programme agreement, with the Ministry of Infrastructure and Transport being identified as the operating body, the National Technical University of Athens as the implementing body and the Ministry of Digital Governance is identified as the financing body. The respective role of each of the above contracting parties is further described in the preamble of the contract (pages 3-4). Further, for the monitoring of the contract, Article 7 of the programme agreement establishes a three-member monitoring group, which will ensure that the terms, the conditions and the scope of this contract are being properly observed and implemented and will take all necessary measures and actions for the implementation of this contract. Therefore, the contract defines the obligations, roles and responsibilities of the two engagement parties and the elements relevant to the description of the measure are covered through the evidence provided.

In line with the description of the measure:

The investment consists of the establishment of interoperability and interfaces between the existing registers of the central public administration bodies, as well as the collection and expansion of registers in order to gradually lead to the smooth and proper operation of digital public services, using interconnected, up to date registers containing cleaned data entries.

For subproject 1:

- These elements are described in section 1.3 of the call for tender, which outlines the purpose and scope of the investment project, and in Annex I sections 1.2 & 5.4 which provide details on the interoperability between the different systems and the methodology related to data migration.

For subproject 2:

- These elements are described in Section 1.3 of the call for tender, which outlines the purpose and scope of the investment project, and in Annex I Section 5.1 which provides details on the interoperability between the different systems. In addition, Annex I section 4.7 focuses on the processes related to the completeness and correctness of the data.

For subproject 3:

- These elements are covered in section 1.3 of the call for tender, which describes the scope of the project and in Annex I section 7, which provides details on the data cleansing process aiming to ensure the quality of the data.

For subproject 4:

- These elements are covered in Article 1 p.3-4 of the programme agreement, which outline the purpose and scope of the investment project, and Annex I p.17, which provides details on the interoperability between the different systems. In addition, Annex I p. 16 and 19 provides details on the processes aiming to ensure the quality and the correctness of the data.

The investment shall facilitate the collection and expansion of existing registers, in one central source, in order to gradually lead to the smooth and proper operation of digital public services

For subproject 1:

- This element is covered in Annex I section 1.2.7 & section 3 of the call for tender, that the operational and technical specifications of the project are described as well as Annex I section 2.1 & 2.2 where the feasibility and the expected benefits of the project are described.

For subproject 2:

- This element is covered in Annex I Sections 2 & 3 of the call for tender, where the scope, the architecture and the operational and technical specifications of the project are described, and in section 4 where the functional requirements are outlined.

For subproject 3:

- This element is covered in Annex I Section 1 & 6 of the call for tender, which provide details on the scope of the project and its expected benefits.

For subproject 4:

- This element is covered in Article 1 p.4 and Annex I p.22 of the programme agreement, which provides details on the objective of the project

The investment shall include data in one place: the registries shall be accessible through one interface and shall be searchable.

For subproject 1:

This element is covered in Annex I section 2.1 of the call for tender, which describes the scope of the project, and in section 1.2.1. & 3.1. where the technical specifications of the system are detailed.

For subproject 2:

- This element is covered in Annex I Section 4 of the call for tender, where the registry's functionalities are described in detail.

For subproject 3:

- This element is covered in Annex I section 2.2.3 of the call for tender, which describes the main and supporting applications and functions of the electronic prescribing system and in Annex I section 2.2.3.2.1, which describes the user management of the system.

For subproject 4:

- This element is covered in Article 1 p.3-4 of the programme agreement, which outlines the objective of the project, and p. 15-16, 19 and 22, which cover the technical functionalities of the system.

The investment shall include up-to-date data: all the data in registers shall be up-to-date and ready to use. Each register shall be accessed via a common API.

For subproject 1:

- These elements are covered in Annex I sections 4.3 and 5.4 of the call for tender, which describe the usability requirements and the data migration services. Annex I section 1.2.7 describes the functionality and architecture of the system.

For subproject 2:

These elements are covered in Annex I section 4.7 of the call for tender, which outlines the functional requirements of the project regarding data, and in Annex I section 5.1, which describes the functionality and architecture of the system. *For subproject 3:*

- These elements are covered in Annex I sections 7 & 9 of the call for tender, which provides details on the data cleansing and data validation methodologies, as well as in Annex I section 2.2.3.3.1 and section 8, which describe the functionality and architecture of the system.,

For subproject 4:

- These elements are covered in Article I p.3-4 and Article II p.6 of the programme agreement, which describe the objective of the project and Annex I p.16 of the programme agreement, which contains references on data readiness.

The investment shall include clean data: by the end of the project the data of the registers shall be clean at the best level possible, and procedures and policies for clean data shall be in place.

For subproject 1: These elements are covered in Annex I section 5.4 of the call for tender, which provides details on the data and system migration services, as well as the data cleansing methodologies. *For subproject 2:*

- These elements are covered in Annex I Section 4.5 & 4.7 of the call for tender, which outline the functional requirements of the project, including the mechanisms and procedures aiming to ensure the accuracy and completeness of the data

For subproject 3:

These elements are covered in Annex I Section 7 of the call for tender, which provides details regarding processes and methodologies aiming to ensure the quality of the data. *For subproject 4:*

- These elements are covered in Annex I p.16 and p.21-22 of the programme agreement, which describe the technical requirements of the project and data quality checks.

The investment shall include linked registries: interoperability shall be ensured.

For subproject 1:

This element is covered in section 1.3 and Annex I sections 1.2.7 & 3.1.6 of the call for tender, which demonstrate the technical requirements of the project, including the interoperability between the different systems. *For subproject 2:*

- This element is covered in Annex I Section 5.1 of the call for tender, which outlines the horizontal requirements of the contract, including the interoperability between the different systems.

For subproject 3:

- This element is covered in Section 1.3.1 of the call for tender, which describes the scope of the project, and in Annex I Sections 2.2.3.3.1, 7 & 8, which focus on the interoperability between the different systems.

For subproject 4:

- This element is covered in Annex I p.17 of the programme agreement, which includes technical descriptions of the project and references on how interoperability will be ensured.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 121	Related Measure: Modernise – Central BI - Data Analytics (Measure ID: 16842)	
Name of the Milestone: Contract award Central Business Intelligence (BI)		
Qualitative Indicator: Notification of award of contract		Time: Q4 2022
<p>Context:</p> <p>The measure aims to enable the public administration to maximise the value it obtains from its data via the implementation of a Central Business Intelligence – Data Analytics Platform for facilitating decision-making at the level of public administration agencies.</p> <p>Milestone 121 concerns the award of the contract for a Central Business Intelligence – Data Analytics platform which covers:</p> <ol style="list-style-type: none"> i. Developing and validating a data governance framework; ii. Data Dictionary; iii. Identification of Key Performance Indicators; iv. Data Governance Framework; v. Design the Architectural Approach & Integration Points; vi. Configuration of the Data Warehouse; vii. Integration with Back-office Information Systems; viii. Building the BI Reports & Analytics; ix. Support of the Operations of BI Ecosystem for 3 years; x. Licenses Fees for 200 users with super admin privileges and 200 TB of Storage. <p>Milestone 121 is the first step of the implementation of the investment, and it will be followed by milestone 129, related to the completion of the central business intelligence and data analytics platform. The investment has a final expected date for implementation in Q4 2025.</p>		

Evidence provided:

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

- i. Summary document duly justifying how the milestone was satisfactorily fulfilled.
- ii. Decision of contract award issued by the Executive Director of Information Society Société Anonyme, for the project “Implementation of the Central Management Hub for Multidimensional Big Data (BigData)”, on 22 December 2022, with protocol number 23068 and number of electronic upload in Diaygeia (ADA Ψ9AB469H4Σ-TPΓ).
- iii. Framework agreement no. 2168 signed by the Information Society SA on 23 May 2023 with ADAM number 23SYMV012734899 2023-05-23.
- iv. Call for tender 14008/04-08-2022, ADAM: 22PROC011085373 2022-08-10 published by the Information Society SA on 04 August 2022.
- v. Print screen of the electronic public procurement platform, showing the notification of contract award message sent to all bidders on 23 December 2022.

Analysis:

The Commission considers that there is a clerical error in the text of the Council Implementing Decision as regards the description of the milestone of the investment 16842 ‘Central BI - Data Analytics’ and has undertaken the assessment on a revised basis. In the description of the milestone, “Key Performance Indicators” and “Data Dictionary” are mentioned twice in the list of the elements that the analytics platform shall cover and the Commission considers redundant point (b) repeating the “Data Dictionary” and point (c) repeating the “Identification of Key Performance Indicators”, given that those elements are to be assessed under point (a) of the milestone. Against this background, the justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone.

Award of the contract for a Central Business Intelligence – Data Analytics platform

In line with the requirements of the Council Implementing Decision, the Greek authorities have notified the award of the contract for this project on 22 December 2022. This is demonstrated through the decision of contract award issued by the Executive Director of Information Society Société Anonyme, which is the contracting authority on behalf of the Greek Ministry of Digital Governance.

The specific requirements for the central business intelligence data analytics platform that are to be covered by this project have been covered in detail in the call for tender 14008/04-08-2022 ADAM: 22PROC011085373 2022-08-10 that was adopted on 4 August 2022. The general scope of the project is described in section 1.3.1 of the call for tender as well as the annex sections 7.3.1- 7.3.3.

The award of the contract shall cover:

- i) **Developing and validating a data governance framework, Data Dictionary & identification of Key Performance Indicators**

The reports and analyses that will be provided by the Central Hub for Management and Analysis of Multidimensional Big Data are categorised into three main pillars (Data Management & Analysis Pillars): A) Economy & Development; B) Social Structures & Services; C) Environment & Infrastructure. The abovementioned services aim at defining, validating and prioritizing the Performance Indicators that need to be captured, calculated and presented in each Data

Management & Analysis Pillar and its relevant sub-areas, as well as the framework by which they will be implemented and governed.

First, in order to identify the key performance indicators, a) the main pillars of analysis will be broken down into sub-areas of interest and the most significant challenges will be mapped per area/sub-area b) candidate indicators will be identified for each area as well as the key stakeholders and interested parties c) reports and analyses will be decomposed into required critical data/systems and Key Performance Indicators, while each Indicator will be decomposed into the individual required data.

As far as the data dictionary is concerned, the indicators that have been defined and required in the first step will be captured in the form of a Data Dictionary, identifying the necessary transformations (calculations) of the information and translating the operational specifications that will have emerged in the previous step into functional specifications. This action will also involve the information collection and mapping of the required dataflows.

Finally, based on the business and technical requirements defined in the previous steps, the data governance framework that will be defined will cover the necessary data policy and regulations, procedures and operating methods, which will include among others, data provisioning, data quality management, metadata management, data privacy and information security.

Sections 7.5.2 and 7.6.2.2. of the call for tender contain the requirement to develop and validate a data governance framework, the creation of a data dictionary and the identification of key performance indicators, thus covering requirements a) – d) of the milestone.

ii) Design of an appropriate architectural blueprint, architectural approach, building blocks and integration points

The design of this central node for the management and analysis of big data will include the following four subsystems a) data collection and storage b) data analytics and machine learning c) data visualisation and d) data governance. For the interoperability between the different subsystems, a suitable architectural design is defined with the aim of covering all the necessary integration points required for the collection, management, and communication of the necessary information. For this purpose, the interfaces of the system were mapped and for each interface, the functional and technical specifications were specified in detail to allow the development of its necessary application.

Further, an appropriate architectural blueprint will be created and will serve as a guide to facilitate the definition of the operational requirements of the main pillars listed under i). The appropriate tools and building blocks of the solution will also be defined as well as the connections between them, with the ultimate goal of meeting the functional specifications of the platform in an efficient manner.

In line with the description of the measure and the description of the milestone, the requirements regarding the design of the architectural approach and integration points are described in section 7.4.2 and 7.5.3 covering requirement e). In addition, sections 7.5.3 and 7.6.2.3 of the call for tender and p.66-68 of the framework agreement contain the requirement of the design of an appropriate architectural blueprint. Finally, the implementation of a Central Business Intelligence – Data Analytics Platform requires the design of building blocks that are covered in sections 7.4.2.3 and 7.6.2.3 of the call for tender.

iii) Configuration of the Data Warehouse

The Data Warehouse will support the generation of the specified Indicators and will act as the core and sole source of data for subsequent reporting and analysis. The components to be defined in this implementation will include supporting structures for the following: 1. Loading source data with the necessary dataflows; 2. Handling and Maintenance of Historical Data; 3. Calculation of prescribed indicators (KPIs); 4. Any necessary supporting areas (sandboxes); 5. Generation and maintenance of backups The configuration of the data warehouse is covered in section 7.5.5.1 of the call for tender fulfilling requirement f).

iv) Integration with Back-office Information Systems

With the implementation and configuration of the Data Warehouse, the interconnection of all relevant source Information Systems should take place, taking into account the maturity (completed, under implementation, mature systems) and importance (main, auxiliary systems), aiming at a gradual coverage of all systems required. This stage includes among others, the definition of appropriate interface standards and the necessary interface tools, the development of the interface flows with the source systems and the development of a mechanism for the orchestration and synchronized execution of the data streams to be implemented.

The integration of the new platform with back-office information systems is covered in section 7.5.5.2 of the call for tender, covering requirement g) from the milestone description.

v) Building the BI Reports & Analytics

After the integration of the first systems in the Data Warehouse and in parallel with the continued interconnection of the other source systems, the development of the necessary Reports and Data Analysis will take place, including the design of the reports/data analysis, the coordination with key stakeholders, the customization of the final report and the completion/publication of reports and results. In the Power BI tool, users will be able to visualise data/provide statistical and interactive reports to support decision-making, from all the data stored under the central data storage subsystem.

The technical specifications covering the building of the Business intelligence reports and analytics are described in sections 7.4.2.1.3 and 7.6.2.5 of the call for tender, covering requirement h) from the milestone description.

vi) Support of the Operations of BI Ecosystem for 3 years

The aim of technical support services is to ensure the proper operation of the Central Node System and the immediate restoration of issues that may arise with regards to the system. The support also includes the maintenance and technical support of software and off-the-shelf packages such as the correction of errors and technical as issues as well as improvements and adaptations of the software.

The requirement to provide support for the Business Intelligence Ecosystem for three years is included in sections 7.3.1 and in more detail section 7.5.8.3 of the call for tender fulfilling the milestone requirement described in point i).

vii) Licenses Fees for 200 users with super admin privileges and 200 TB of Storage

The call for tender specifies that the project also contains the user licences with super admin privileges for at least 200 users. This is specified in sections 7.4.2.1.3 and 7.4.2.5 of the call for tender

as well as section 2.3.7 of the framework agreement, which establish that 200 users will have “premium access” in the power BI tool and they will be able to visualise data and provide statistical and interactive reports to support decision making, from all the data stored under the central data storage subsystem.

The central data storage subsystem that will be used to feed information extracted from the primary systems and other data warehouses will have a capacity of 200TB. The provision of a storage capacity of 200TB storage is covered by section 2.3.2.13 in the framework agreement. This covers point j) of the technical specifications required for this milestone.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 134	Related Measure: Promote job creation and participation in the labour market – Digital Transformation of Labour Systems (Measure ID: 16750)	
Name of the Milestone: Labour IT systems contract award		
Qualitative Indicator: Notification of award of contracts		Time: Q4 2022
<p>Context:</p> <p>The objective of this investment is to modernise the public administration’s capacity to offer better and faster services to employees and employers, with a view to cutting red tape, improving the effectiveness of labour market monitoring mechanisms, reducing undeclared and undeclared work, and obtaining timely and accurate data. Notably, the investment consists of the upgrading of the digital infrastructure of e-EFKA (Unified Social Security Fund), including the Digital Pension Award system (ATLAS), and the interconnection of disparate IT systems (ERGANI, EFKA and SEPE) under a single system (ARIADNE). Finally, the investment includes the setting-up of an Integrated IT system for occupational health and safety issues (HERIDANOS).</p> <p>Milestone 134 concerns the completion of contract award for the following projects:</p> <ul style="list-style-type: none"> • Single IT system for labour market monitoring (ARIADNE) • Occupational Health and Safety (HERIDANOS) • Statutory minimum wage setting process • Digitisation of the Single Pension Fund’s (e-EFKA) insurance history • New integrated information system for e-EFKA (EFKA IITS) • Upgrade of the digital pension award system <p>Milestone 134 is the first step of the implementation of the investment and it will be followed by milestone 136 and 137. Milestone 136 relates to the completion of the upgrade of the digital pension award system (ATLAS) allowing for the better handling of pension and lump sum benefits claims, through the entry into force of secondary legislation enacting the system, while milestone 137 relates to the implementation of the single IT system for labour market monitoring (ARIADNE) through the entry into force of secondary legislation launching nation-wide collection of data through the system. The investment has a final expected date for implementation on 31 December 2024.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p>		

i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.

ii. Copy of contracts award notification:

- Notification of 10 December 2021 of Decision of Minister of Labour and Social Affairs No. 2846/19.11.2021 awarding the contract for the sub-project '*Digital work card*' as part of the project '*Single IT system for labour market monitoring (ARIADNE)*';
- Notification of 21 February 2023 of Decision by Minister of Labour and Social Affairs No. 16937/14.02.2023 awarding the contract for the sub-project '*Single flow of labour and insurance data and upgrade of the Information System of the Labour Inspection Authority (formerly SEPE)*' as part of the project '*Single IT system for labour market monitoring (ARIADNE)*';
- Notification of 2 March 2023 of Decision by Minister of Labour and Social Affairs No. 7195/21.01.2023 awarding the contract for the project '*Occupational Health and Safety (HERIDANOS)*';
- List of participants of tendering procedure of the project '*Statutory minimum wage setting process*' and Notification of 17 April 2023 of Decision No. 43344/27.04.2023 awarding the contract for the project '*Statutory minimum wage setting process*';
- Notification of 31 March 2023 of Decision No. 152/31.03.2023 of Governor of e-EFKA awarding the contract for the project '*Digitisation of the Single Pension Fund's (e-EFKA) insurance history*';
- Notification of 3 March 2023 of Decision No. 97/03.03.2023 of Governor of e-EFKA awarding the contract for the project '*Development of a new Integrated Information System for e-EFKA and upgrading of the digital pension award system (ATLAS)*'.

iii. The list of contractual counterparts (as part of the summary note).

The authorities also provided:

- i) Decision of Minister of Labour and Social Affairs No. 746/04.11.2021 launching the sub-project '*Digital work card*' as part of the project '*Single IT system for labour market monitoring (ARIADNE)*' (published on the Ministry's website <https://ypergasias.gov.gr/>, ADAM number 21PROC009481629).
- ii) Decision of Minister of Labour and Social Affairs No. 2846/19.11.2021 awarding the sub-contract for the sub-project '*Digital work card*' as part of the project '*Single IT system for labour market monitoring (ARIADNE)*' (ΑΔΑ number: ΨΒΛΤ46ΜΤΛΚ-ΠΒΙ).
- iii) Call for applications No. 107739/14.11.2022 for sub-project '*Single flow of labour and insurance data and upgrade of the Information System of the Labour Inspection Authority (formerly SEPE)*' as part of the project '*Single IT system for the monitoring of the labour market (ARIADNE)*', published in the website of the Ministry of Labour and Social Affairs <https://ypergasias.gov.gr/> with link <https://ypergasias.gov.gr/wp-content/uploads/2022/11/%CE%94%CE%99%CE%91%CE%9A%CE%97%CE%A1%CE%A5%CE%9E%CE%97.pdf> with ADAM number 22PROC011632522.
- iv) Decision of Minister of Labour and Social Affairs No. 16937/14.02.2023 awarding the contract for the sub-project '*Single flow of labour and insurance data and upgrade of the Information System of the Labour Inspection Authority (formerly SEPE)*' as part of the Single IT system for the monitoring of the labour market (ARIADNE).

- v) Call for applications No. 94237/04.10.2022 for project '*Occupational Health and Safety (HERIDANOS)*', published on the website of Ministry of Labour and Social Affairs <https://ypergasias.gov.gr/> with ADAM number 22PROC011394650.
- vi) Decision No. 7195/23.01.2023 of Minister of Labour and Social Affairs awarding the contract for the project '*Occupational Health and Safety (HERIDANOS)*'.
- vii) Call for applications No. 125253/23.12.2022 for project '*Statutory minimum wage setting process*', published on the website of Ministry of Labour and Social Affairs <https://ypergasias.gov.gr/> with link with ADAM number 22PROC011929023.
- viii) Decision No. 43344/27.04.2023 awarding the contract for the project '*Statutory minimum wage setting process*'.
- ix) Call for applications No. 491124/21.10.2022 for project: '*Digitisation of the Single Pension Fund's (e-EFKA) insurance history*', published on the website of of e-National Social Security Fund <https://www.efka.gov.gr/> with link <https://www.efka.gov.gr/sites/default/files/2022-10/%CE%A5%CE%A0%201%20%CE%94%CE%99%CE%91%CE%9A%CE%97%CE%A1%CE%A5%CE%9E%CE%97%20%CE%9C%CE%95%20%CE%91%CE%94%CE%91%CE%9C.pdf> with ADAM number 22PROC011465045.
- x) Decision No. 152/31.03.2023 of Governor of e-National Social Security Fund (e-EFKA) awarding the contract for the project '*Digitisation of the Single Pension Fund's (e-EFKA) insurance history*'.
- xi) Call for applications No. 564987/30.11.2022 for project '*Development of a new Integrated Information System for e-EFKA and upgrading of the digital pension award system (ATLAS)*', published on the website of e-National Social Security Fund <https://www.efka.gov.gr/> with link <https://www.efka.gov.gr/sites/default/files/2022-11/%CE%94%CE%99%CE%91%CE%9A%CE%97%CE%A1%CE%A5%CE%9E%CE%97%CE%A6%CE%A0%CE%A5%112%20%CE%BC%CE%B5%20%CE%91%CE%94%CE%91%CE%9C.pdf> with ADAM number 22PROC011703508.
- xii) xv. Decision No. 97/03.03.2023 of Governor of e-National Social Security Fund (e-EFKA) awarding the contract for the project '*New integrated information system for e- EFKA (EFKA IITS)*' including the '*upgrade of the digital pension award system (ATLAS)*'.

Analysis:

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

More specifically, in line with the description of the milestone:

- **Completion of contract award for the project: Single IT system for labour market monitoring (ARIADNE)** is met by a) the notification to the selected contractor of 10 December 2021 of the Decision of Minister of Labour and Social Affairs No. 2846/19.11.2021 awarding the contract for the sub-project '*Digital work card*' as part of the project '*Single IT system for labour market monitoring (ARIADNE)*', and b) the notification of 21 February 2023 of the Decision by Minister of Labour and Social Affairs No. 16937/14.02.2023 awarding the contract for the sub-project '*Single flow of labour and insurance data and upgrade of the Information System of the Labour Inspection Authority (formerly SEPE)*' as part of the project '*Single IT system for labour market monitoring (ARIADNE)*'.
- **Completion of contract award for the project: Occupational Health and Safety (HERIDANOS)** is met by the notification to the selected contractor of 2 March 2023 of the

Decision by the Minister of Labour and Social Affairs No. 7195/21.01.2023 awarding the contract for the corresponding project.

- **Completion of contract award for the project: Statutory minimum wage setting process** is met by the notification to the selected contractor of 17 April 2023 of Decision No. 43344/27.04.2023 awarding the contract for the project '*Statutory minimum wage setting process*' to the non-excluded participants of tendering procedure for the corresponding project as evidenced by the submitted list (extract from public procurement digital platform of Ministry of Digital Governance).
- **The completion of contract award for the project: Digitisation of the Single Pension Fund's (e-EFKA) insurance history** is met by the notification to the selected contractor of 31 March 2023 of the Decision No. 152/31.03.2023 of the Governor of e-EFKA awarding the contract for the corresponding project.
- **The completion of contract award for the projects a) New integrated information system for e-EFKA (EFKA IITS) and b) Upgrade of the digital pension award system (ATLAS)** is met by the notification to the selected contractor of 3 March 2023 of the Decision No. 97/03.03.2023 of the Governor of e-EFKA awarding the contract for the *project 'Development of a new Integrated Information System for e-EFKA and upgrading of the "ATLAS" digital pension award system'*.

Furthermore, in line with the description of the measure:

- **The investment consists of the upgrading of the digital infrastructure of e-EFKA (Unified Social Security Fund), including the Digital Pension Award system (ATLAS).** According to the Call for applications No. 564987/30.11.2022 for project '*Development of a new Integrated Information System for e-EFKA and upgrading of the digital pension award system (ATLAS)*' and following the completion of the project, e-EFKA is equipped with a state-of-the-art information system that supports all its functions and services. The main channel through which employers are served is the online portal. However, other channels are also supported through the development of a modern multi-channel service centre. Some specific services are available to users through mobile applications. Furthermore, through the e-EFKA central information management subsystem, the e-EFKA management has access to immediate and accurate information on critical aspects of the e-EFKA operations, which is further leveraged to formulate a social strategy insurance and improving service delivery.
- **The investment consists of the interconnection of disparate IT systems (ERGANI, EFKA and SEPE) under a single system (ARIADNE).** As evidenced by the Decision of Minister of Labour and Social Affairs No. 746/04.11.2021 launching the project '*Digital work card*' and the Call for applications No. 107739/14.11.2022 for project '*Single flow of labour and insurance data and upgrade of the Information System of the Labour Inspection Authority (formerly SEPE)*', one of the objectives of the investment is to set up an *integrated information system for the monitoring of the labour market* through a) the integration into the ERGANI IT system of new functions/services, such as the digital work card add-on application that allows for the real-time recording of working time of salaried employees and the on-line social insurance declaration form (Analytical Periodical Declaration or APD) that allows for a single flow of real-time administrative data on employment and social security between ERGANI and EFKA, and b) the upgrading of the Integrated information system of the Labour Inspection Authorities (formerly Labour Inspection Body or SEPE) that allows labour inspectors to have

real-time online access to the employment and social security data of the APD and digital e-card.

- **The investment includes the setting-up of an Integrated IT system for occupational health and safety issues (HERIDANOS).** According to the Call for applications No. 94237/04.10.2022 for project '*Occupational Health and Safety (HERIDANOS)*', the implementation of that investment fills in an existing gap, namely the absence of an integrated IT system for occupational Health and Safety. A central database is created for documents and datasets, allowing for the collection and management of fragmented registries and facilitating all involved stakeholders/users (such as employers, workers, safety technicians, occupational doctors) in the management of Occupational Safety and Health issues in the workplace.
- **The investment's objective to reduce red tape** is achieved through the electronic submission of social security data by employers directly in the ERGANI IT system and the channelling of that data to the Social Security Fund (EFKA). Moreover, the development of the new Integrated Information System of e-EFKA and the upgrade of the "ATLAS" digital pension awarding system allows employers to be served through an online portal, a modern multi-channel service centre and mobile applications.
- **The investment's objective to improve the effectiveness of labour market monitoring mechanisms and reducing undeclared and undeclared work** is achieved through the digital work card add-on application of the ERGANI IT system that allows for real-time recording of working time of salaried employees and also through its interconnection with the Labour Inspection Authority's (formerly SEPE) IT system that allows the cross-matching of data on working time, employment and social security and facilitates targeted labour inspections.
- **The objective of obtaining timely and accurate data** is pursued through a) the digital work card that allows for real-time recording of working time of salaried employees, b) the development of an IT tool for the collection from different datasets and sources, and the processing of qualitative and quantitative data that are relevant for setting the statutory minimum wage, c) the upgrading of the IT system of e-EFKA and of the pension award system that put in place a central information management system on social security, and d) the digitisation of e-EFKA social insurance history that allows for the checking and merging of data from different paper sources and increases accuracy in pension award.
- Altogether, the aforementioned investment elements contribute to the objective of **modernising the public administration's capacity to offer better and faster services to employees and employers.**

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 139	Related Measure: Education, vocational education and training, and skills – A New Strategy for Lifelong Skilling: Modernising and Upgrading Greece's Upskilling and Reskilling System (Measure ID: 16913)		
Name of the Target: Training programmes lifelong learning strategy completion validation			
Quantitative Indicator: Number of persons who received a certificate of successful participation in a training programme	Baseline: 0	Goal: 150,000	Time: Q4 2022

Context:

The objective of the reform is to increase the quality and labour market relevance of the national lifelong learning framework through the modernization, upgrade and interconnection of existing datasets of different ministries and agencies, the setting up a National Skills Council as a central supervisory body, and the establishment of lifelong skilling accounts for training participants, a national eligible training provider list and evaluation framework (scorecard), and a labour market diagnosis mechanism. The reform is accompanied by an investment in horizontal upskilling programmes targeting various population groups and aimed at providing them with baseline and medium-level digital skills, green skills and financial literacy skills.

Target 139 requires the completion of training programmes on digital, green and financial literacy skills for at least 150,000 participants and validation and certification of skills acquired for all successful participants. This investment tackles the need for digital, green and financial literacy skills of the following population groups: a) unemployed, especially the youth and long-term unemployed, b) employees, especially those with high unemployment risk and those who are left behind by workspace technology, c) employees, especially at SMEs with limited in-house training capacity, d) public sector employees, including teachers. Skills offered are: a) Baseline digital skills, b) Medium-level digital skills, c) Green skills and d) Financial literacy skills.

Target 139 is the second target of the reform, and it follows the completion of milestone 138, related to the entry into force of primary and secondary legislation setting out the key elements of the new lifelong learning framework, on the basis of the National Strategy for Lifelong Learning. It will be followed by target 140, related to the completion of the abovementioned training programmes for 500,000 participants and validation and certification of skills, with at least 33% of the total participants receiving training programmes on green skills and jobs in the green economy. The reform has a final expected date for implementation in Q4 2025.

Evidence Provided:

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

1. Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled. This document included as an annex the following documentary evidence and elements:

- a. A list of the individual certificates proving that the training programmes have been completed;
- b. The number of training actions;
- c. The type of training provided with detail of its content; and
- d. A report by the responsible body confirming the certification and recognition of acquired skills.

2. On the basis of the above list of the individual certificates that was annexed to the summary document, the following documentary evidence was requested: copies of a randomly selected sample of 60 individual training certificates proving that the training programmes had been completed and that there was validation and certification of skills acquired for all 60 successful participants.

The authorities also provided:

A. As concerns the training programmes for the unemployed persons:

3. Decision of Board of Directors of the Public Employment Service (DYPA) No 1430/26/01.03.2022 on 'Upskilling and reskilling programs in in-Demand industries with a focus on digital and green Skills' (Official Journal B' 1446/24.3.2022)
4. Decision of Board of Directors of DYPA No 6440/129/13.12.2022 (Official Journal B' 6511/19.12.2022) amending the Board of Directors Decision No 1430/26 on 'Upskilling and reskilling programs in in-Demand Industries with a focus on digital and green Skills'
5. Public Call no 186373/05-04-2022 (ΑΔΑ: 6ΚΒΨ4691Ω2-253) for submission of applications by training providers to the "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
6. Amendment No 21442/09.01.2023 (ΑΔΑ: 6ΟΖ34691Ω2-ΔΥΔ) of Call no 186373/05.04.2022 (ΑΔΑ: 6ΚΒΨ4691Ω2-253) for the submission of applications by training providers to the "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
7. Amendment No 6506/129/13.12.2022 (ΑΔΑ: Ψ5Γ14691Ω2-Μ4Υ) of Call no 186373/05.04.2022 (ΑΔΑ: 6ΚΒΨ4691Ω2-253) call for submission of applications by training providers to the "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
8. Amendment 203/07/24.01.2023 (ΑΔΑ: 9ΥΡΕ4691Ω2-ΕΩΜ) of no 6506/129/13.12.2022 and of Call no 21442/9.1.2023 (ΑΔΑ: 6ΟΖ34691Ω2-ΔΥΔ) for submission of applications by training providers to the "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
9. Amendment 961/23/15.03.2023 (ΑΔΑ: 9ΑΜΨ4691Ω2-ΔΑΒ) of no 1649/33/15.03.2022 and of call 186373/5.4.2022 call for submission of applications by training providers to the "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
10. Amendment 1923/36/29.09.2023 (ΑΔΑ: 600Υ4691Ω2-Κ01) of no 1649/33/15.03.2022 and of call 186373/5.4.2022 call for submission of applications by training providers to the "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
11. Amendment 1508/33/25.4.2023 (ΑΔΑ: 6Θ6Φ4691Ω2-ΚΓΕ) of 1649/33/15.3.2022 and of call no 186373/5.4.2022 for submission of applications by training providers to the "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
12. Call no 186406/05.04.2022 (ΑΔΑ: ΨΞ0Β4691Ω2-ΒΜΔ) for expression of interest to training providers within public universities regarding: "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
13. Amendment Call no 21432/09-01-2023 (ΑΔΑ: ΡΗΕΩ4691Ω2-ΦΞ4) of the Call no 186406/05.04.2022 (ΑΔΑ: ΨΞ0Β4691Ω2-ΒΜΔ) for expression of interest to training providers within public universities regarding: "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
14. Call no 354070/18.05.2022 (ΑΔΑ: 91ΧΙ4691Ω2-3ΩΙ) for the submission of applications by certification providers regarding: "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"

15. Amendment Call no 21441/09.01.2023 (ΑΔΑ: 96Ψ74691Ω2-9ΛΝ) of the Call 354070/18.05.2022 (ΑΔΑ: 91ΧΙ4691Ω2-3ΩΙ) for the submission of applications by certification providers regarding: “Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills”
16. Call no 503791/21.06.2022 (ΑΔΑ: 65ΓΟ4691Ω2-ΠΡΟ) for the submission of training programs from training providers included in DYPA registries regarding: “Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills”
17. Call no 651461/27.07.2022 (ΑΔΑ: ΨΣ2Ψ4691Ω2-9ΤΑ) for submission of applications from unemployed Beneficiaries regarding “Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills”
18. Amendment no 21436/09.01.2023 (ΑΔΑ: ΡΕΖΓ4691Ω2-Ι04) of the Call no 651461/27.07.2022 (ΑΔΑ:ΨΣ2Ψ4691Ω2-9ΤΑ) for the submission of applications from unemployed beneficiaries regarding “Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills”

B. As concerns the training programmes for the employed persons:

19. Decision of Board of Directors of DYPA No 6073/125/15.11.2022 on ‘Upskilling and reskilling programs for employees in all sectors of the economy with a focus on digital and green Skills’ (Official journal B’ 5961/22.11.2022)
20. Decision of Board of Directors of DYPA No 6511/130/14-12-2022 amending Decision of Board of Directors No 6073/125/15.11.2022 on ‘Upskilling and reskilling programs for employees in all sectors of the economy with a focus on digital and green Skills’ (Official Journal B’ 6457/17.12.2022).
21. Decision of Board of Directors of DYPA No 2387/55/20-06-2023 amending Decision 6073/125/15.11.2022 on ‘Upskilling and reskilling programs for employees in all sectors of the economy with a focus on digital and green Skills’ (Official Journal B’ 4003/22.06.2023)
22. Public call no 1255523/20-12-2022 (ΑΔΑ: Ρ3Ω84691Ω2-ΝΘ0) for the submission of training providers (K.D.V.M.) regarding: “Upskilling and reskilling programs for employees in all sectors of the Economy with a focus on Digital and Green Skills”
23. Call no 6508/130/14.12.2022 (ΑΔΑ:6ΧΠΩ4691Ω2-4ΑΟ) for the submission of applications regarding “Upskilling and reskilling programs for employees in all sectors of the Economy with a focus on Digital and Green Skills”
24. Amendment no 960/23/15.03.2023 (ΨΙ5Θ4691Ω2-ΞΙΥ) of no 6508/130/14.12.2022 and of no1255523/20.12.2022 of Public call for the submission of applications regarding “Upskilling and reskilling programs for employees in all sectors of the Economy with a focus on Digital and Green Skills”
25. Amendment no 1304/33/6.4.2023 (ΨΓ7Ι4691Ω2-95Γ) of no 6508/130/14.12.2022 and of no1255523/20.12.2022 of Public call for the submission of applications regarding “Upskilling and reskilling programs for employees in all sectors of the Economy with a focus on Digital and Green Skills”
26. Amendment no 1507/36/25.04.2023 (Ψ8Φ64691Ω2-ΟΙ1) of no 6508/130/14.12.2022 and of no 1255523/20.12.2022 of Public call for the submission of applications regarding “Upskilling and reskilling programs for employees in all sectors of the Economy with a focus on Digital and Green Skills”

27. Public call no 1255557/20.12.2022 (ΑΔΑ: 92ΛΧ4691Ω2-Α9Ι) for the submission of AEIs' training providers (K.E.DI.VI.M.) regarding: "Upskilling and reskilling programs for employees in all sectors of the Economy with a focus on Digital and Green Skills"
28. Public call no 1255542/20.12.2022 (correction 22.12.2022) (ΑΔΑ: 9ΛΔ74691Ω2-ΤΟΔ) for submission of applications from employees Beneficiaries regarding "Upskilling and reskilling programs in In-Demand Industries with a focus on Digital and Green Skills"
29. Public call no 1287210/30.12.2022 (ΑΔΑ: ΨΝΘΝ4691Ω2-94Ω) for the submission of certificate providers regarding: "Upskilling and reskilling programs for employees in all sectors of the Economy with a focus on Digital and Green Skills"
30. Public call no 134887/02.02.2023 (ΑΔΑ: 946Ω4691Ω2-115) for the submission of training programs from training providers included in DYPA registries regarding: "Upskilling and reskilling programs for employees in all sectors of the Economy with a focus on Digital and Green Skills"

C. As concerns the training programmes for public sector employees

31. Decision of Board of Directors of the National Center for Public Administration and Local Government (EKDDA) no 5280/07.03.2023 regarding the approval of the supplementary training programming of the Training Institute (INEP) (ΑΔΑ ΨΑΑΠ4691Φ0-ΛΤΞ).
32. Decision of Board of Directors of EKDDA no 1603/15.03.2023 Decision regarding the training programme of public sector teachers (ΑΔΑ ΨΒΜΑ4691Φ0-Ω62).
33. Curriculum issued by EKDDA concerning the provision of training program titled "The Digital Transformation of Education" addressed to educational personnel and employees of the Ministry of Education.

Analysis:

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

Completion of training programmes on digital, green and financial literacy skills for at least 150,000 participants and validation and certification of skills acquired for all successful participants

The requirements are met by:

a) The report of the Governor of the Public Employment Service that confirms the completion of training programmes and the certification and validation of acquired skills in subjects of the above three broad areas for 150,000 persons (item 1.d in Analysis section).

b) The information in the summary document that confirms that digital skills were offered to 118,695 trainees, green skills were offered to 27,246 trainees, and financial literacy skills were offered to 4,059 trainees (item 1 in Analysis section).

c) The sampling exercise (item 2 in Analysis section). The authorities provided a sample of 60 training certificates that was checked by the Commission on 13 April 2023: the information provided, confirmed the successful completion and of the training programme for all participants. Specifically, for each of the training participants, the unique identification number was cross-referenced to the information contained in the training certificates. All certificates corresponded to successful completion of the relevant training programme and to the validation of skills through successful participation in exams organised by certified bodies.

This investment tackles the need for digital, green and financial literacy skills of the following population groups: a) unemployed, especially the youth and long-term unemployed, b) employees, especially those with high unemployment risk and those who are left behind by workspace technology, c) employees, especially at SMEs with limited in-house training capacity, d) public sector employees, including teachers.

The requirement is met by:

a) The report of the Governor of the Public Employment Service that confirms the targeted provision of training programmes on digital, green and financial literacy skills to specific population groups (item 1.d in Analysis section).

b) The Decisions of the Board of Directors of the Public Employment Service for providing upskilling and reskilling programs to both unemployed persons and private sector employees with a focus on digital and green skills (items 3, 4, 19, 20, 21 in Analysis section).

c) The Decisions of Board of Directors of the National Center for Public Administration and Local Government (EKDDA) and the Curriculum issued by EKDDA for providing a digital upskilling programme to employees of the Ministry of Education, including teachers (items 31, 32 and 33 in Analysis section).

d) The public calls for the submission of applications by training providers and potential trainees, and their amendments (items 5-18 and 22-30 in Analysis section).

e) The information in the summary document (item 1 in Analysis section) that confirms that:

- A total 1 098 training actions (titles of courses) were provided to unemployed beneficiaries.
- A total 99 309 unemployed persons received training (58,867 persons on baseline digital skills, 19 699 trainees on medium-level digital skills, 19,615 persons on green skills, and 1 128 persons on financial literacy skills). Out of these 99,309 unemployed persons, 47,051 (47.3%) were aged below 39 years and 54,385 (54.8%) were long-term unemployed (unemployed for more than 12 months).
- A total of 726 training actions were provided to private sector employees and one training action was provided to public sector employees, including teachers. A total 50,674 private sector employees received training (40,112 on digital skills, 7,631 on green skills and 2,931 on financial literacy skills). Out of the total 50 674 private sector employees, 39,582 persons (78.1%) were employed in SMEs with limited in-house training capacity and 27,879 persons had an education level of up to post-secondary education, thus falling under the category of persons with high unemployment risk and those who are left behind by workspace technology.
- A total 17 public sector employees, including teachers, received training on medium-level digital skills.

Skills offered are: a) Baseline digital skills, b) Medium-level digital skills, c) Green skills and d) Financial literacy skills.

The requirement is met by:

a) The report of the Governor of the Public Employment Service that confirms the targeted provision of training programmes on digital, green and financial literacy skills of various levels (item 1.d in Analysis section).

b) The Decisions of the Board of Directors of the Public Employment Service for providing upskilling and reskilling programs with a focus on digital and green skills of various levels (items 3, 4, 19, 20, 21 in Analysis section).

c) The Public calls for the submission of applications by training providers and potential trainees, and their amendments (items 5-18 and 22-30 in Analysis section).

d) The Decisions of the Board of Directors of the National Center for Public Administration and Local Government and the Curriculum issued by EKDDA for providing a digital upskilling programme to employees of the Ministry of Education, including teachers (items 31, 32 and 33 in Analysis section).

e) The information in the summary document (item 1 of Analysis section) that confirms that baseline digital skills were offered to 88 525 trainees, medium-level digital skills were offered to 30 170 trainees, green skills were offered to 27 246 trainees, and financial literacy skills were offered to 4 059 trainees.

In particular, the training programmes on **baseline digital skills** included courses on data collection and processing and the use of basic computer applications (Windows, Office). They also included familiarization with functions and application of modern marketing, such as new digital marketing strategies, social media, advertising and communication, as well as theoretical and practical knowledge in the field of secretarial support as well as e-commerce basic principles. Upon completion of the programmes, trainees should be able to adopt in the digital environment of a company.

The training programmes on **medium-level digital skills** included courses for individuals who wanted to engage in website design, digital communication and marketing media, supply chain management, holistic social media strategies and the acquisition of technical and business skills, which are required for the comprehensive secretarial support of an executive office. Upon completion of the programmes, trainees should be able to apply the necessary techniques for research, collection, storage, processing and distribution of information with the help of computer systems.

The training programmes on **green skills** aimed to offer the necessary knowledge and skills related to the transition to green frameworks and fundamentals. Courses described the different types of natural disasters and climate change and how they can be managed. Moreover, they introduced the concept of green entrepreneurship and the exploitation of green opportunities, the circular economy, and lastly the concept of renewable energy sources and their importance for today's societies and economies. Upon completion of the programmes, trainees should have the necessary knowledge to undertake tasks in the fields of environment, environmental management and energy.

The training programmes on **financial literacy skills** covered topics related to Project Management, Accounting and Tax Management, Data Management and Business Administration. Moreover, they prepared trainees to enter a business or organization at theoretical and practical level. Upon completion of the programmes, trainees should have gained in-depth knowledge of the basic concepts of Business and Organizational Management, including the ability to control financial data in order to be able to use this knowledge in elementary business functions such as organization, control and planning.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 142	Related Measure: Promote job creation and participation in the labour market – Reform of Passive Labour Market Policies to Support Transitions to Employment (Measure ID: 16746)	
Name of the Milestone: Mutual obligation framework reform entry into force of legislation		
Qualitative Indicator: Entry into force of legislation		Time: Q3 2022
<p>Context:</p> <p>The objective of this reform is to further improve the framework of mutual obligations that currently applies between the public employment service (PES) and jobseekers. Milestone 142 requires the entry into force of legislation for reforming the mutual obligations framework, which sets out the relationship between the PES and the jobseeker. Among others, the reform will include a new definition of active job search and sanctions for those unemployed not abiding by the new rules. Milestone 142 is the only milestone or target of this reform.</p> <p>Following the completion of this milestone, in line with the description of the measure in the Council Implementing Decision, Greece will test the labour market effects of a) an increase of the level and coverage of the long-term unemployment benefit and b) an indexation of the standard unemployment benefit to the latest net wage level. Moreover, Greece will a) consolidate and streamline unemployment benefits and allowances to improve public spending efficiency, and b) remove disincentives for upskilling/reskilling among the unemployed by retaining their entitlement to unemployment benefits during participation in trainings. These are further steps of this reform that are not linked to the milestones and targets in the Council Implementing Decision.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ul style="list-style-type: none"> i. Copy of the publication in the Official Journal for primary legislation (Law 4921/2022 on '<i>Jobs Again: Reorganization of the Public Employment Service and digitization of its services, upgrading of skills of the workforce and diagnosis of the needs of the labour market and other provisions</i>', published in the Official Journal A 75/18.04.2022). ii. Copy of the publication in the Official Journal of Decision of the Governor of the Public Employment Service (PES) No. 5274/114 on '<i>Specification of the mutual obligations between the Public Employment Service and the active jobseekers, as well as of the related consequences</i>'. The Decision was published in the Official Journal B 5078/28.09.2022. iii. Copy of the publication in the Official Journal of Joint Decision No 121382/15.12.2022 signed between the Minister of Labour and Social Affairs and the Minister of Digital Governance on the '<i>Definition of the template of the digital Individual Action Plan as well as of the deadlines and the process for its preparation and revision</i>'. The Decision was published in the Official Journal B 6510/19.12.2022. iv. Copy of the publication in the Official Journal of Joint Decision No 122164/16.12.2022 signed between the Minister of Labour and Social Affairs and the Minister of Digital Governance on '<i>Definition of specific issues for the operation of the digital Register and the issuance of the digital Card of the PES</i>'. The Decision was published in the Official Journal B 6509/19.12.2022. v. Copy of the publication in the Official Journal of Joint Decision No 125676/22.22.2022 signed between the Minister of Labour and Social Affairs and the Minister of Digital Governance on the '<i>Completion of the transition of the existing unemployment registers of the PES into PES's digital</i> 		

Register and starting of the operation of the latter'. The Decision was published in the Official Journal B 6867/29.12.2022.

vi. A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.

Analysis:

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

Entry into force of legislation for reforming the mutual obligations framework which sets out the relationship between the Public Employment Service (PES) and the jobseeker.

The requirement is met by primary Law 4921/2022 on *'Jobs Again: Reorganization of the Public Employment Service and digitization of its services, upgrading of skills of the workforce and diagnosis of the needs of the labour market and other provisions'*. Articles 16-23 of the Law lay down a new framework of mutual obligations to apply between PES and jobseekers and introduce a digital Individual Action Plan, a digital Register, and a digital card for jobseekers. According to Article 82§2 and Article 18§8 of the Law, the Articles 16-23 of the Law relevant for achieving the objectives laid down in the milestone description entered into force on the date of the publication in the Official Journal of the Joint Decision of the Minister of Labour and Social Affairs and the Minister of Digital Governance No 125676/22.12.2022, namely on 29 December 2022. Moreover, the authorities adopted the secondary legislation, namely four Decisions, to implement Articles 16-23 of the primary Law 4921/2022. The Decisions entered into force on the date of the publication in the Official Journal of the Joint Decision of the Minister of Labour and Social Affairs and the Minister of Digital Governance No 125676/22.12.2022, namely on 29 December 2022, according to Article 82§2 and Article 18§8 of Law 4921/2022 and the related Articles of the Decisions.²

The reform will include a new definition of active job search

The requirement is met by Article 21 of primary Law 4921/2022 and by Article 2 of the Decision of the Governor of PES No. 5274/114. According to Article 82§2 and Article 18§8 of Law 4921/2022, Article 21 of Law 4921/2022 and Article 2 of the Decision of the Governor of PES No. 5274/114 entered into force on the date of the publication in the Official Journal of the Joint Decision of the Ministers of Labour and Social Affairs and Digital Governance No 125676/22.12.2022, namely on 29 December 2022. Compared with the previous framework of mutual obligations (Decision of the Board of the Public Employment Service No 792/20/20.03.2018 on the *'Clarification of the obligations of jobseekers who are registered with the Public Employment Service in exchange for obligations of the latter towards them'*, OJ 1236/B/4.4.2018), these Articles set out in greater detail

² These Decisions include: a) Decision of the Governor of the Public Employment Service (PES) No. 5274/114 on *'Specification of the mutual obligations between the Public Employment Service and the active jobseekers, as well as of the related consequences'* (OJ B 5078/28.09.2022); Joint Decision No 121382/15.12.2022 signed between the Minister of Labour and Social Affairs and the Minister of Digital Governance on the *'Definition of the template of the digital Individual Action Plan as well as of the deadlines and the process for its preparation and revision'* (OJ B 6510/19.12.2022); c) Joint Decision No 122164/16.12.2022 signed between the Minister of Labour and Social Affairs and the Minister of Digital Governance on *'Definition of the specific operational issues of PES' digital Register and of the edition of the PES's digital Card'* (OJ B 6509/19.12.2022); d) Joint Decision No 125676/22.12.2022 signed between the Minister of Labour and Social Affairs and the Minister of Digital Governance on the *'Completion of the transition of the existing unemployment registers of the PES into PES's digital Register and the starting of the operation of the latter'* (OJ B 6867/29.12.2022).

the actions a jobseeker who is registered in the digital Register should be involved in throughout the period of being registered with the PES to prove that she or he is actively searching for work. In particular, active job search corresponds to (a) acceptance of a job offered by the PES, provided that it is in accordance with the jobseekers' digital Individual Action Plan; (b) participation in continuing vocational training and employment programmes and actions that are indicated by the PES, and (c) cooperation with the employment counsellor, in particular for the purpose of the drafting or revision of the digital Individual Action Plan. In addition, the jobseeker need to carry out one or more actions including (a) cooperation with the PES or other public or private employment service with a view to finding a job, (b) submission of recruitment applications and/or CVs directly to employers, (c) participation in competitions or interviews aiming at recruitment. The jobseeker should also be able to submit evidence of all the above actions if requested. Taken together, the above two Articles introduce a new definition of active job search.

The reform will include sanctions for those unemployed not abiding by the new rules

The requirement is met by Articles 22 and 23 of Law 4921/2022 as well as by Article 4 of the Decision of the Governor of PES No. 5274/114 on '*Specification of the mutual obligations between the Public Employment Service and the active jobseekers, as well as of the related consequences*'. These legal provisions introduced a system of sanctions applicable in case of specific actions or omissions on the side of the jobseeker that notably relate to:

The jobseeker's information included in the digital Register of PES and the fulfilment of conditions for remaining in the register or for receiving the unemployment benefit. Sanctions apply in the following cases:

- The jobseeker is not providing information in the digital Register of PES or declares false information when registering and remaining in the digital Register of PES;
- Failure to update information in the register;
- Simultaneous employment;
- Failure to renew the digital card;
- Failure to declare presence with the PES (in the case of receipt of unemployment benefit);
- Failure to notify the PES for other (than employment) reasons of deregistration;
- Failure to submit evidence and required supporting documents for remaining in the register.

The omissions described above lead to temporary deregistration for various time periods depending on the type of the omission (deregistration for 30 days or 6 months). In the specific case of unemployment benefit recipients, the omission leads to the benefit being stopped or suspended. The benefit may be stopped or withdrawn, a relevant debt may be attributed and monthly benefits may be withheld. Furthermore, in cases of false declarations, failure to update information and receipt of benefits while working, an administrative fine of €500-10,000 is foreseen.

(ii) The attitude of the jobseeker in regard to job search and his/her overall cooperation with the employment counsellor. Sanctions are imposed in case of jobseeker's actions which demonstrate partial or insufficient job-search activity. More specifically: failure to respond to a job offer or to suggested programmes or measures aimed at skill/qualification acquisition or development or failure to attend a scheduled appointment with an employment counsellor, failure to set up a digital individual action plan, failure to inform the counsellor about the outcome of a job offer, failure to participate in vocational education, training or employment counselling, rejection of three job offers, failure to submit evidence of active job search, failure to positively respond to a medical test referral aimed at ascertaining one's fitness for work. The consequence of the omissions described above is a temporary deregistration for various time periods depending on the type of the omission (deregistration for 30 days, 6 months or 2 years). In the specific case of unemployment benefit recipients, the consequence of the omissions is the end or suspension of the benefit, or also the withholding of monthly benefits.

By comparison, the previous framework of mutual obligations (Decision of the Board of the Public Employment Service No 792/20/20.03.2018 on the 'Clarification of the obligations of jobseekers who are registered with the Public Employment Service in exchange for obligations of the latter towards them', OJ 1236/B/04.04.2018) provided for a general description of obligations of jobseekers and did not provide for any consequences or sanctions in case of not compliance with those obligations.

Furthermore, in line with the description of the measure, **the objective of further improving the framework of mutual obligations that currently applies between the public employment service and jobseekers** is met by Articles 16-23 of Law 4921/2022 as well as by the adopted secondary laws, notably by:

i) The Decision by the Governor of PES No 5274/114/27.09.2022 that further specified the mutual obligations of the PES and the jobseekers who are registered in PES's digital Register, by clearly defining the obligations of the above parties and the consequences to apply when the relevant obligations are not met. According to Article 4, the above Decision entered into force on the date of the publication in the Official Journal of the Joint Decision of the Ministers of Labour and Social Affairs and Digital Governance No 125676/22.12.2022, namely on 29 December 2022.

ii) The Joint Ministerial Decision No 121382/15.12.2022 that allows for the implementation of the *Digital Individual Action Plan* of the jobseeker in a personalized way. The Digital Individual Action Plan is set up jointly by the jobseeker and the employment advisor and records all possible actions that a jobseeker must take to find a suitable job, notably by making use of suitable job offers, vocational training programmes, educational programmes, individual job counselling services, or career guidance. The Plan is in digital form and it is a useful tool for the job matching process but also the basis for the obligations of jobseekers and the PES and for related sanctions. According to Article 4, the above Decision entered into force on the date of the publication in the Official Journal of the Joint Decision of the Ministers of Labour and Social Affairs and Digital Governance No 125676/22.12.2022, namely on 29 December 2022.

iii) Joint Ministerial Decisions No. 122164/19.12.2022 and No 125676/27.12.2022 that allow for the implementation of the PES's *digital Register* containing information for jobseekers and setting out responsibilities for the maintaining and updating of the PES's digital Register. According to Article 10 of the Joint Ministerial Decision No. 122164/19.12.2022, the Decision entered into force on the date of the publication in the Official Journal of the Joint Decision of the Ministers of Labour and Social Affairs and Digital Governance No 125676/22.12.2022, namely on 29 December 2022. According to Article 1 of the Joint Ministerial Decision No. 122164/19.12.2022, the Decision entered into force on the date of its publication in the Official Journal, namely on 29 December 2022.

Within the new system of obligations and sanctions, PES is expected to motivate and actively involve jobseekers in the labour (re)integration process, also ensuring effective commitment and constant cooperation with the PES counsellors.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 159	Related Measure: Improve resilience, accessibility and sustainability of healthcare – Reform of the Primary Health Care System (Measure ID: 16755)	
Name of the Milestone: Primary Health Care family medicine curricula activation		
Qualitative Indicator: Proof of start of courses for all newly activated academic curricula in family medicine and of the inclusion of a family medicine module in all medical curricula.		Time: Q4 2022

Context:

The measure aims to build a strong primary healthcare system by upgrading the infrastructure and medical equipment of health centres through energy efficient renovations and measures and by reorganizing their structure by retraining the health professionals to act as first-line care. In addition, the expansion of active family medicine curricula to at least 75% of medical schools and the introduction of an element of family medicine in all medical schools will help familiarise a larger number of medical students with the primary healthcare field. Moreover, the measure aims at supporting the development of an integrated healthcare system by establishing an effective framework for chronic diseases management. Finally, some selected projects shall comply with the Do No Significant Harm Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU environmental legislation.

Milestone #159 consists of two points: i) expand the number of active academic curricula in family medicine to at least 75% of medical schools in Greece and ii) include a compulsory module in family medicine in all medical curricula. This shall include documentation, for the affected universities, highlighting the new architecture of degrees: 1) newly established curricula and 2) inclusion of the compulsory module in family medicine in existing curricula.

Milestone #159 is the first step of the implementation of the reform, and it will be followed by milestones #161 and #166, related to the notification of award of contracts and completion of the renovation of at least 156 Health Centres (50% of total Health Centres in Greece) that shall be upgraded through energy efficient renovations and energy efficient measures regarding the public infrastructure and medical equipment. The reform has a final expected date for implementation in Q4 2025.

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Copy of a letter from the Dean of Athens Medical School 10065/02.02.2023 on the family medicine curricula and modules that currently exist in Athens Medical School's undergraduate studies programme
- iii. Note from Thessaloniki Medical School on the family medicine curricula and modules that currently exist in Thessaloniki Medical School's undergraduate studies programme (the information can be also found at <https://www.med.auth.gr/content/programma-proptyhiakon-spydon-1oy-4oy-etoys> and <https://www.med.auth.gr/content/programma-proptyhiakon-spydon-5oy-6oy-etoys>)
- iv. Copy of a letter from the Dean of Crete Medical School 2006/93/30.01.2023 verifying the existence of a compulsory module in family medicine
- v. Copy of e-mails of 15 March 2023 and 27 April 2023 from Crete Medical School providing details on the family medicine curricula and modules that currently exist in Crete Medical School's undergraduate studies programme as well as details on the faculty members with a specialisation in the relevant fields of family medicine
- vi. Copy of e-mail of 14 March 2023 from Ioannina Medical School providing details on the compulsory module in family medicine that currently exists in Ioannina Medical School's undergraduate studies programme

- vii. Copy of e-mail of 10 May 2023 from Ioannina Medical School providing details on the new course as well as on the new elements introduced since February 2020 to other courses of undergraduate studies that enhance the concept of family medicine
- viii. Copy of a letter of 15 May 2023 from the Dean of Patras Medical School on the modification of the content of the undergraduate studies programme by introducing a new family medicine course in the next academic year
- ix. Copy of the minutes 848/31.01.2023 of the extraordinary meeting of the Assembly of the Medical School of Patras regarding the approval of the modification of the content of the Undergraduate Studies Programme
- x. Copy of a letter from the Dean of Thessaly Medical School 1523(εξ.)/14.03.2023 providing details on the compulsory module in family medicine that currently exists in Ioannina Medical School undergraduate studies programme
- xi. Copy of e-mail of 3 May 2023 from Thessaly Medical School providing details on the faculty members with a specialisation in the relevant fields of family medicine
- xii. Copy of letters of 31 January 2023 and 14 March 2023 from the Dean of Thrace Medical School providing details on the family medicine curricula and modules that exist or will be introduced in Thrace Medical School undergraduate studies programme (including a copy of the Assembly's decision T.I.10/31.01.2023 on introducing a new course in family medicine)
- xiii. Modification of undergraduate studies programme of Thrace Medical School with the introduction of the course "Primary healthcare": <https://med.duth.gr/wp-content/uploads/2023/07/%CE%A4%CF%81%CE%BF%CF%80%CE%BF%CF%80%CE%BF%CE%AF%CE%B7%CF%83%CE%B7-%CE%A0%CF%81%CE%BF%CE%B3%CF%81%CE%AC%CE%BC%CE%B1%CE%BC%CF%84%CE%BF%CF%82-%CE%A3%CF%80%CE%BF%CF%85%CE%B4%CF%8E%CE%BD-%CE%B3%CE%B9%CE%B1-%CE%B5%CE%B9%CF%83%CE%B1%CE%BA%CF%84%CE%AD%CE%BF%CF%85%CF%82-2023-2024.pdf>
- xiv. Copy of e-mail of 27 April 2023 from Thrace Medical School providing details on the faculty members with a specialisation in the relevant fields of family medicine
- xv. Copy of the Decision Γ5α/Γ.Π.οικ. 64843 of Alternate Minister of Health, Official Journal B 4138/20.09.2018 "Introduction, renaming of medical specialties, determination of time and content of practice for obtaining a specialty title."
- xvi. Correct mistakes of the Decision of Minister of Health Γ5α/ΓΚοικ.45856/12.06.2019 concerning the medical specialty in General Medicine, Official Journal B 3065/31.07.2019
- xvii. Copy of Law 4957/2022, Official Journal A 141/21.07.2022, "*New Horizons in Higher Education Institutions: Strengthening the quality, functionality and connectivity of Higher Education Institutions with society and other provisions.*"

Analysis:

The justification and substantiating evidence provided by Greece cover all constitutive elements of the milestone. The milestone has two elements which have the following qualitative indicators:

Proof of inclusion of a family medicine module in all medical curricula

The Council Implementing Decision requires Greece to include a family medicine module to all medical schools' curricula. The objective of this measure is to help familiarise a large number of medical students with the primary healthcare field. As such, curriculum is considered referring to a

set of courses at undergraduate level, since that allows reaching the largest possible number of medical students. This also applies to the second element of the milestone which is related to the expansion of the number of active academic curricula in family medicine to at least 75% of medical schools in Greece.

In line with the description of the measure, a family medicine module is included in the undergraduate curriculum of all 7 medical schools. In specific, in 6 out of 7 medical schools (Athens, Thessaloniki, Thessaly, Ioannina, Crete and Thrace), the existing medical curricula, which are publicly available, already include a compulsory module in family medicine. For Patras Medical School, where the start of the compulsory module shall take place in the next academic year (2023-2024), Greece provided a letter from the Dean confirming the modification of the content of the undergraduate studies programme by introducing a new family medicine course. This letter was also accompanied by a copy of the relevant decision of the university's assembly. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Proof of start of courses for all newly activated academic curricula in family medicine. Expand the number of active academic curricula in family medicine to at least 75% of medical schools in Greece

The Council Implementing Decision requires Greece to expand the availability of active (where the courses have already started) family medicine curricula so that these are offered by at least 75% of medical schools. A curriculum in family medicine is considered a set of courses in the field of family medicine. In this context, before the implementation of this milestone, three medical schools had an active academic curriculum in family medicine by offering at least two courses in the subject of general/family medicine as well as of social/preventive medicine and public health. Specifically, the Medical School of Athens offered two family medicine related courses ("General medicine" and "Preventive Medicine and Public Health"), Medical School of Thessaloniki offered three courses ("Clinical practice in primary health care and general medicine", "Introduction to clinical skills and practice" and "Basic clinical skills") and Medical School of Crete offered two courses ("Introduction to Public Health" and "Clinical practice in primary health care"). It can be confirmed that additional courses related to family medicine were introduced to medical schools' undergraduate studies programme. Medical School of Thrace introduced a new course related to family medicine which will be taught for the first time in the winter semester of the academic year 2023-2024, bringing the total number of family medicine courses to two ("Social medicine" and "Primary health care"). Likewise, Medical School of Ioannina is also considered to have an active academic curriculum in family medicine as a new course "Social Medicine with an emphasis on the promotion of children's health" was added to the already existing course "General medicine" and new elements were introduced to other courses of undergraduate studies that enhance the concept of family medicine. Finally, a new course was introduced to undergraduate studies programme of Thessaloniki Medical School ("Introduction to health policy and primary health care"), bringing the total number of family medicine courses to four. As a result, five out of seven medical schools have an active family medicine curriculum (Medical Schools of Athens, Thessaloniki, Crete, Thrace and Ioannina).

Greece provided all the necessary evidence demonstrating the progress described above, including statements by the Deans of the Medical Schools verifying the existence of a family medicine curricula, detailed description of the courses and their relevance to family medicine, the number of enrolled students (where available) and confirmation from the Medical Schools that the newly introduced courses will be taught in the next academic year (2023-2024) at the latest. The Council Implementing Decision required the expansion of the number of active academic curricula in family

medicine to at least 75% of medical schools. Greece achieved five out of seven (71%) medical schools to have an active curriculum in family medicine. Whilst this constitutes a minimal numerical deviation of 4.8% from the requirement of the Council Implementing Decision, the overall objective of this milestone is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 160	Related Measure: Improve resilience, accessibility and sustainability of healthcare – Reform in the fields of mental health and addictions (Measure ID: 16820)		
Name of the Target: Mental health – 50 units open – step 1 of 2			
Quantitative Indicator: Number of Mental Health Units completed and operational	Baseline: 0	Goal: 50	Time: Q4 2022
Context:			
<p>The objective of this reform is to strengthen the mental health framework by providing comprehensive and responsive services to specific groups suffering from mental illness and addiction, ensuring access to all population through the digitalization of relevant services and implement actions for promotion and prevention and reduction of stigmatization and institutionalisation. The expanded and enhanced mental health services and other planned actions will focus mainly on patients with dementia, Alzheimer's disease and autism, on patients in the age group of children, adolescents and young adults as well as on supporting addicts and dependent individuals.</p> <p>Target #160 requires the establishment and full operation of 50 Mental Health Units (implemented through a renovation of existing units) supported by the National Strategic Plan for the support of mental health (out of a total of 106 mental health units).</p> <p>Target #160 is the first step of the implementation of the reform, and it will be followed by target #162, related to the completion of this project through the establishment and full operation of additional 56 Mental Health Units (implemented through a renovation of existing units) supported by the National Strategic Plan for the support of mental health to reach a total of 106 mental health units.</p>			
Evidence Provided:			
<p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. ii. Report from Ministry of Health Γ3B/ΓΠ οικ. 24573/27.04.2023 including documentation for milestone #160 iii. Table from Ministry of Health with data for staff and patients per mental health unit iv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71381/22/16.01.2023, "Granting of a license to establish a timely Intervention Unit 			

- for Psychosis, to the urban non-profit organization Regional Development and Mental Health Organization (*EPAPSY*), in the Administrative Region of Attica - Regional Unit of the Northern Sector of Athens”
- v. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71631/19.12.2022, “Granting of a license to establish a timely Intervention Unit in Psychosis, to the urban non-profit organization "*XENIOS ZEUS*", in the Administrative Region of Peloponnese - Mental Health Sector of Arcadia, Laconia, Argolis - Regional Unit of Arcadia.
 - vi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.70972/15.12.2022, “Granting a license to establish a timely Intervention Unit in Psychosis, to the Non-Profit Association for the Prevention and Promotion of Health Services "*IKELOS*", in the Administrative Region of Attica, Regional Unit of Piraeus.”
 - vii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71374/15.12.2022, “Granting of a license to establish a timely Intervention Unit in Psychosis, in the non-profit Organization for Regional Development and Mental Health (*EPAPSY*), in the Administrative Region of Central Macedonia, Regional Unit of Thessaloniki”.
 - viii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71632/19.12.2022, “Granting a license to establish a timely Intervention Unit in Psychosis, to the urban non-profit organization "*XENIOS ZEUS*", in the Administrative Region of Crete - mental health sector of Heraklion Lasithi - Regional Unit of Heraklion”.
 - ix. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71104/15.12.2022, “Granting a license to establish a nursing home (A1) for 15 adults with serious mental disorders and serious psychosocial problems or people with mental retardation and secondary mental disorders, in the "*INTERNATIONAL CENTER FOR SUSTAINABLE DEVELOPMENT*" ("*DIETHNES KENTRO GIA TI VIOSIMI ANAPTIKSI*")", in the Mental Health Sector of Corfu - Ioannina - Thesprotia.
 - x. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.73218/20.12.2022, “Granting a license to establish a nursing home (A5) for 25 people suffering from end-stage dementia at the HELLENIC ORGANIZATION OF MEDICAL PSYCHOLOGY ("*ELLINIKI ETERIA IATRIKIS PSYCHOLOGIAS*") in the Administration of Attica, in the 2nd YPE, in the 3rd Department of Mental Health of Attica in the municipalities of Aspropyrgos, Elefsinas, Mandras Idyllias, Megareon”.
 - xi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71154/15.12.2022, “Granting a license to establish a nursing home (A7) for 15 people with severe mental disorders and excitable behavior, who need increased care either temporarily due to relapse (short-term accommodation), or on a permanent basis, at the Urban Non-Profit organization "*IASIS*", in the 1st & 2nd YPE”.
 - xii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71200/15.12.2022, “Granting a license to establish a nursing home (A6) for 15 people with severe mental disorders and/or severe mental retardation and accompanying organic problems in the Urban Non-Profit organization "*THALPOS PSYCHIKI HYGEIA*", in the Mental Health Sector of Messinia”.
 - xiii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71157/15.12.2022, “Granting a license to establish a nursing home (A1) for 15 adults with severe mental disorders and serious psychosocial problems or people with mental retardation and secondary mental disorders, in the Urban Non-Profit organization "*IASIS*", in the Regional Unit of the Eastern and Western Sectors of Athens”.
 - xiv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π.71197/15.12.2022, “Granting a license to establish a nursing home (A1) for 15 adults with serious mental disorders and serious psychosocial problems or people with mental retardation and secondary mental disorders, in the Urban Non-Profit organization "*THALPOS PSYCHIKI HYGEIA*", in the Mental Health Sector of Messinia”.

- xv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.8387/22.02.2023, "Granting a license to establish a nursing home (A3) for fifteen (15) people with organic psych syndromes, Alzheimer's disease and related disorders in the Urban Non-Profit organization "GI KAI ANTHROPOS" in the Administrative Region of Attica, in the Regional Unit of the Northern Sector of Athens".
- xvi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73953/22.12.2022, "Granting a license to establish a nursing home (A3) for fifteen (15) people with organic psych syndromes, Alzheimer's disease and related disorders in the NGO APOSTOLI in the Administrative Region of Central Greece, in the Mental Health Sector of Fthiotida Evrytania, in the Regional Unit of Fthiotida".
- xvii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73204/20.12.2022, "Granting a license to establish a nursing home (A5) for 25 people suffering from end-stage dementia at the ORGANIZATION FOR THE DEVELOPMENT OF COMMUNITY MENTAL HEALTH SERVICES FOR CHILDREN AND ADULTS (PANAKEIA) in the South Aegean Administrative Region, in the Dodecanese Mental Health Sector, in the Rhodes Regional Unit".
- xviii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73210/20.12.2022, "Granting a license to establish a nursing home (A5) for 25 people suffering from end-stage dementia at the HELLENIC ORGANIZATION OF MEDICAL PSYCHOLOGY ("ELLINIKI ETERIA IATRIKIS PSICHOLOGIAS") in the Administrative Region of the Ionian Islands, the Mental Health Sector of Corfu, Ioannina, Thesprotia, in the Regional Unit of Corfu".
- xix. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 7153/15.12.2022, "Granting a license to establish a nursing home (A7) for 15 people with severe mental disorders and excitable behaviour, who need increased care either temporarily due to relapse (short-term accommodation), or on a permanent basis, at the Urban Non-Profit organization "IASIS", in the 3rd YPE. – Administrative Region of Macedonia".
- xx. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.72668/16.12.2022, "Granting a license to establish a Mobile Unit for adults to the urban non-profit organization " THALPOS PSYCHIKI HYGEIA".
- xxi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73586/20.12.2022, "Granting a license to establish a Mobile Unit for adults with dementia at the ALZHEIMER AND RELATED DISORDERS ORGANIZATION OF ATHENS in the Administrative Region of Attica, in the 2nd Department of Mental Health of Attica, in the Municipality of Piraeus".
- xxii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.72669/16.12.2022, "Granting a license to establish a Mobile Unit for adults in the Association of Families and Friends for Mental Health, Alzheimer's Disease and Congenital Disorders of Serres Prefecture "SOFPSY N. SERRON".
- xxiii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73558/20.12.2022, "Granting a license to establish a Mobile Unit for or people with dementia at the ALZHEIMER AND RELATED DISORDERS ORGANIZATION OF ATHENS in the Administrative Region of Epirus, in the Mental Health Sector of Arta Preveza Lefkada, in the Regional Unit of Arta".
- xxiv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.72675/16.12.2022, "Granting a license to establish a Mobile Unit for Adults at the Organization of Neurosciences and Rehabilitation "E.N.A".
- xxv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.72676/16.12.2022, "Granting a license to establish a Mobile Unit for Adults in the Urban Non-Profit organization of Psychosocial Interventions "AGALIA".

- xxvi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.74239/23.12.2022, "Granting a license to establish a Mobile Unit for people with dementia at the ALZHEIMER'S AND RELATED DISORDERS ORGANIZATION OF ATHENS in the Administrative Region of Attica, in the 5th Department of Mental Health of Attica, in the municipalities of Acharnon, Lykovrysis-Pefkis, Prefecture of Heraklion".
- xxvii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.72666/16.12.2022, "Granting a license to establish a Mobile Unit for children and Adolescents to the Urban Non-Profit organization of Social Solidarity *"Syn-irmos"*".
- xxviii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73309/20.12.2022, "Granting a license to establish a Mobile Unit for people with dementia at ALLILEGII HERACLEIOU – ORGANIZATION FOR ALZHEIMER'S DISEASE AND HEALTHY AGING in the Administrative Region of Crete, in the Mental Health Sector of Heraklion Lasithi, in the Regional Unit of Heraklion".
- xxix. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.72672/16.12.2022, "Granting a license to establish a Mobile Unit for Adults in the PANHELLENIC ASSOCIATION FOR PSYCHOSOCIAL REHABILITATION AND VOCATIONAL REINTEGRATION *"P.E.P.S.A.E.E"* in the Administrative Region of Attica, in the 3rd Sector of Mental Health of Attica (Municipalities of Aspropyrgos, Elefsinas, Mandras Idyllias, Megareon)".
- xxx. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71147/16.12.2022, "Granting of a license to establish a guest house (B1) for 10-12 Delinquent Adolescents, to the Urban Non-Profit organization *"IASIS"*, in the 3rd YPE, Administrative Region of Central Macedonia".
- xxxi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71198/15.12.2022, "Granting of a license to establish a guest house (B1) for 15 adults with serious mental disorders and serious psychosocial problems, in the Urban Non-Profit organization *"THALPOS PSYCHIKI HYGEIA"*, in the Mental Health Sector of Messinia".
- xxxii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71865/15.12.2022, "Granting of a license to establish a guest house (B1) for 10-12 Delinquent Adolescents, to the Urban Non-Profit organization *"HELLENIC COMPANY OF MEDICAL PSYCHOLOGY"*, in the Regional Unit of the Central Sector of Athens".
- xxxiii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73589/20.12.2022, "Granting a license to establish a day care centre for people with dementia at the ALZHEIMER AND RELATED DISORDERS ORGANIZATION OF ATHENS in the Administrative Region of Attica, in the 2nd Department of Mental Health of Attica, in the Municipality of Piraeus".
- xxxiv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71569/15.12.2022, "Granting a license to establish a day care centre for children, adolescents and young adults with Neoplastic Disease at the HELLENIC ANTI-CANCER ORGANIZATION in the Administrative Region of Attica."
- xxxv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.74540/22.12.2022, "Granting a license to establish a day care centre for people with dementia at the HELLENIC ORGANIZATION OF ALZHEIMER'S DISEASE AND RELATED DISORDERS OF CHALKIDAS in the Administrative Region of Central Greece - Mental Health Sector of Evia, in the Regional Unit of Evia".
- xxxvi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71409/15.12.2022, "Granting a license to establish a day care centre for adults in the ASSOCIATION OF FAMILIES AND FRIENDS FOR THE MENTAL HEALTH OF ALZHEIMER'S DISEASE AND RELATED DISORDERS OF SERRON *"SOFPSY SERRON"* in the Administrative Region of North Macedonia, Department of Mental Health of Serres, Drama, Kilkis-Regional Unit of Serres".

- xxvii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 72928/15.12.2022, "Granting a license to establish a day care centre for people with dementia at the ALZHEIMER'S AND RELATED DISORDERS ORGANIZATION OF ATHENS in the Administrative Region of Attica, in the 5th Department of Mental Health of Attica, in the municipalities of Acharnea, Lykovrysi-Pefkis, Neo Heraklion".
- xxviii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71189/16.12.2022, "Granting a license to establish a day care centre for Children & Adolescents in the non-profit organization " *THALPOS PSYCHIKI HYGEIA* " in the Administrative Region of Attica in the 2nd Department of Mental Health for Children & Adolescents in the Municipalities of Penteli, Vrilissi, Kifissia".
- xxix. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71191/19.12.2022, "Granting a license to establish a day care centre for family support to the " *THALPOS PSYCHIKI HYGEIA* " NGO in the Administrative Region of Attica in the 1st Department of Mental Health for Children & Adolescents in the Regional Unit of the Western Sector of Athens in the Municipalities of Aigaleo, Peristeri, Perama, Agia Varvara, Chaidari".
- xl. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71145/19.12.2022, "Granting a license to establish a day care centre for family support at non-profit organization "*IASIS*", in the 1st Department of Mental Health for Children and Adolescents in the Regional Unit of Thessaloniki".
- xli. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71226/15.12.2022, "Granting a license to establish a day care centre for adults in the PANHELLIC ASSOCIATION FOR PSYCHOSOCIAL REHABILITATION AND VOCATIONAL REINTEGRATION "*P.E.P.S.A.E.E.*" in the Administrative Region of Attica, in the 3rd Sector of Mental Health of Attica, in the municipalities of Aspropyrgos, Elefsina, Mandras Idyllias, Megaron".
- xlii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73585/20.12.2022, "Granting a license to establish a day care centre for people with dementia at the ALZHEIMER AND RELATED DISORDERS ORGANIZATION OF ATHENS in the Administrative Region of Epirus, in the Mental Health Sector of Arta Preveza Lefkada, in the Regional Unit of Arta".
- xliii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.72414/15.12.2022, "Granting a license to establish a day care centre for Children and Adolescents in the non-profit organization of Social Solidarity *SYNEIRMOS* in the Administrative Region of Thessaly, in the 1st Department of Mental Health for children and adolescents in the Regional Unit of Trikala".
- xliv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71959/15.12.2022, "Granting a license to establish a day care centre for adults to non-profit organization "*TACHEIA THERAPEIA - THERAPY EXPRESS*" in the Administrative Region of Attica, in the Regional Unit of the Northern Sector of Athens, in the municipalities of Filothei - Psyhikou, Ag. Paraskevi".
- xlv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71193/15.12.2022, "Granting a license to establish a day care centre for the support of employees in the " *THALPOS PSYCHIKI HYGEIA* " NGO in the Administrative Region of Attica, in the Regional Unit of the Central Sector of Athens in the Municipality of Athens & its Municipal Units".
- xlvi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71160/16.12.2022, "Granting a license to establish a day care centre for the psychological support of employees at the "*IASIS*" Community Centre in the Administrative Region of Central Macedonia, in the Regional Unit of Thessaloniki".

- xlvi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71222/16.12.2022, "Granting a license to establish a day care centre for the support of workers in the PANHELLIC UNION FOR PSYCHOSOCIAL REHABILITATION AND VOCATIONAL REINTEGRATION "P.E.P.S.A.E.E." in the Administrative Region of Attica, in the 2nd Mental Health Sector, in the Regional Unit of Piraeus".
- xlvii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71194/19.12.2022, "Granting a license to establish a day care centre for adults to the "THALPOS PSYCHIKI HYGEIA" NGO in the Administrative Region of Eastern Attica - Municipalities of Nea Makri, Marathona, Grammatikou, Oropou".
- xlvi. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. οικ.73308/20.12.2022, "Granting a license to establish a day care centre for people with dementia at ALLILEGII HERACLEIOU – ORGANIZATION FOR ALZHEIMER'S DISEASE AND HEALTHY AGING in the Administrative Region of Crete, in the Mental Health Sector of Heraklion Lasithi, in the Regional Unit of Heraklion".
 - i. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71149/19.12.2022, "Granting a license to establish a day care centre for adults at non-profit organization PSYCHOSOCIAL INTERVENTIONS "AGALIA" in the Administrative Region of Attica Province, in the 11th Mental Health Sector in the municipalities of Kropia, Vari, Voula, Vouliagmeni, Markopoulos, Saronikos".
 - ii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 711225/16.12.2022, "Granting a license to establish a day care centre for the support of workers in the PANHELLIC UNION FOR PSYCHOSOCIAL REHABILITATION AND VOCATIONAL REINTEGRATION "P.E.P.S.A.E.E." in the Regional Unit of the Western Sector of Athens, in the 1st Sector of Mental Health in the municipalities of Aigaleo, Peristeri, Chaidari, Petroupoli".
 - iii. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 71618/15.12.2022, "Granting a license to establish a day care centre for dealing with Eating Disorders of children and adolescents at the REGIONAL DEVELOPMENT AND MENTAL HEALTH ORGANIZATION "EPAPSY" in the Administrative Region of Central Macedonia, in the 1st Mental Health Sector in the Regional Unit of Thessaloniki".
 - iv. Copy of the decision of the Head of the Directorate General of Health Services Γ3β/Γ.Π. 73115/22/10.02.2023, "Granting a license to establish a day care centre for people with dementia at the HELLENIC ALZHEIMER'S AND RELATED DISORDERS SOCIETY OF THESSALONIKI in the Administrative Region of K. Macedonia - Department of Mental Health Pieria, Imathia, Pella - Pieria Regional Unit".
- lv. Copy of the National Strategic Plan for the support of mental health
- lv. Copy of the public tender Γ3β/Γ.Π./οικ. 44585/29.07.2022 for the establishment of 8 nursing homes, 6 day centres and 4 mobile units
- lv. Copy of the public tender Γ3β/Γ.Π./οικ. 44583/29.07.2022 for the establishment of 8 units of timely intervention
- lv. Copy of the public tender Γ3β/Γ.Π./οικ. 44584/29.07.2022 for the establishment of 12 nursing homes and one guest house
- lv. Copy of the public tender Γ3β/Γ.Π./οικ. 44582/29.07.2022 for the establishment of 10 day centres and 5 mobile units
- lv. Copy of the public tender Γ3β/Γ.Π./οικ. 44586/29.07.2022 for the establishment of 8 day centres, 3 guest houses and 1 mobile unit

Analysis:

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

Establishment and full operation of 50 Mental Health Units (implemented through a renovation of existing units) supported by the National Strategic Plan for the support of mental health (out of a total of 106 mental health units)

50 licenses of establishment for an equal number of mental health units have been issued in line with the Council Implementing Decision. Specifically:

- i. Regarding the renovation, the tenders issued foresee renovation works and equipment procurement so that each unit meets the specifications of the current legislation for the respective type of mental health unit.
- ii. Regarding the establishment of the mental health units, Greece issued 5 public tenders for the establishment of 65 mental health units on 29 July 2022. These tenders were for the establishment of 24day centres, height units for timely intervention, three guest houses, ten mobile units and 20 nursing homes offering mental health services and support to children, adolescents, young adults and families, to patients suffering from dementia & Alzheimer’s disease and to adults. Out of the 65 units that were procured, a total of 64 were assigned to successful tenderers after the completion of the process. Following the successful tenders, Greek Ministry of Health issued 54 licenses of establishment, in December 2022, which are the official documents of certification. For the assessment of fulfilment of the target, 50 of them are taken into account and include 21 day centres, five units for timely intervention, ten mobile units, three guest houses, and 11 nursing homes.
- iii. Regarding the full operation of these mental health units, Greece provided staff data per unit and per main category of staff. Until April, 412 persons were employed in these 50 mental health units, including 44 psychiatrists/medical staff, 86 psychologists, 45 social workers, 58 nursing staff and 179 other staff. It is noted that two mental health units are not sufficiently staffed because they have only one person as staff which in one case is not even a medical staff, thus they are not considered fully operational.
 - a. The Council Implementing Decision required the establishment and full operation of 50 mental health units. Greece has established and fully operationalized 48 mental health units. Whilst this constitutes a minimal numerical deviation of 4% from the requirement of the Council Implementing Decision, the overall objective of this target is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.
- iv. Regarding the National Strategic Plan for the support of mental health, Greece has prepared its National Strategic Plan for the support of mental health which aims at the de-institutionalization and modernization of the mental Health Services delivery system by creating modern, community-oriented and integrated services. It is structured in ten axes that reflect the spirit of the integration of mental healthcare reform, with special care for all population groups, de-stigmatization, empowerment of the mentally ill and timely response to crisis situations. The proposed actions described in the National Strategic Plan support the establishment and full operation of mental health units and most notably the actions included in the following axes:
 - Axis1: Completion of the abolition of institutional care, with the parallel development of services for people with Alzheimer's disease and related disorders
 - Axis 2: Further development and integration of the community network of mental Health Services, emphasizing prevention with the simultaneous integration of Mental Health Services in Primary Healthcare, utilizing modern digital technologies

- Axis 3: Completing the network of mental Health Services for children and adolescents, with an emphasis on prevention, including special provision for people with Pervasive Developmental Disorders
- Axis 8: Strengthening the inclusion of people with mental health problems in the labor market and developing programs for the protection of workers' mental health

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 191	Related Measure: Making taxes more growth friendly and improving tax administration and tax collection – New framework for the fight against smuggling, mainly for products subject to excise duties (tobacco, alcohol and energy) (Measure ID: 16656)	
Name of the Milestone: Fight against smuggling – adoption of regulatory decisions		
Qualitative Indicator: Regulatory decisions / circulars entered into force		Time: Q3 2022
Context:		
<p>The measure aims to support the fight against smuggling for those products subject to excise duties (tobacco, alcohol, energy) through the modernisation of the Customs' tracking systems, audit processes, and equipment to increase the effectiveness of cargo audits. It also includes the upgrading of the IT systems of the Independent Authority for Public Revenue (IAPR) in order to obtain information from European and national databases.</p> <p>Milestone 191 concerns the entry into force of 15 regulatory decisions / circulars adopted by the Independent Authority for Public Revenue on the design of a new integrated system for the fight against smuggling.</p> <p>In accordance with the roadmap adopted on 31 March 2022 as part of milestone 190, the required decisions and circulars entering into force concern the preparation of a new integrated system which will support the audit process by monitoring customs transactions and procedures in real time. This system shall operate by aiming at better and faster targeting of the prosecuting custom services with central supervision and at the points of high interest.</p> <p>Milestone 191 is the second and last milestone of the reform, and it follows the completion of milestone 190 related to the adoption of the roadmap outlining the necessary legislative changes to support the fight against smuggling. The reform has a final expected date for implementation in Q4 2025.</p>		
Evidence provided:		
<p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. ii. Copy of the 15 regulatory decisions / circulars adopted by the Independent Authority for Public Revenue: <ul style="list-style-type: none"> • Act of the Council of Ministers No. 48 of 7 December 2020, published in the Official Government Gazette A' 257 of 24 December 2020. 		

- Decision of the Governor of IAPR, No. A.1006 of 12 January 2021, published in the Official Government Gazette B' 248 of 27 January 2021.
- Joint decision of the Deputy Minister of Finance and the Governor of IAPR, No. 1027184 ΕΞ2021 of 31 March 2021, with number of electronic upload in Diaygeia ADA number: 6EBY46MΠ3Z-6NY.
- Decision of the Governor of IAPR No. A.1103 of 23 April 2021, published in the Official Government Gazette B' 1994 of 14 May 2021.
- Decision of the Governor of IAPR No. A.1146 of 24 June 2021, published in the Official Government Gazette B' 2853 of 01.07.2021.
- Joint Ministerial Decision of the Ministers of Finance, Development and Investments, State and the Governor of the IAPR, No. A.1230 of 14 October 2021, published in the Official Government Gazette B' 4904 of 22 October 2021 & 5000 of 27 October 2021 (Correction of error B' 5000).
- Joint Ministerial Decision of the Ministers of Finance, Development and Investment, Infrastructure and Transport, Digital Governance and the Governor of IAPR, No. A. 1016 of 28 January 2022, published in the Official Government Gazette B 489 of 8 February 2022.
- Decision of the Governor of IAPR No. A 1035448 ΕΞ 2022 of 21 April 2022, published in the Official Government Gazette B 2110 of 28.04.2022.
- Decision of the Governor of IAPR No. A.1079 of 15 June 2022, published in the Official Government Gazette B 3100 of 17.06.2022.
- Joint Ministerial Decision of the Ministers of Finance, Development and Investment, Infrastructure and Transport, Digital Governance and the Governor of IAPR, No. A 1080 of 15 June 2022, published in the Official Government Gazette B 3146 of 22 June 2022, with number of electronic upload in Diaygeia ADA number: Ψ28I46MΠ3Z-NTN.
- Joint Ministerial Decision of the Ministers of Finance, Environment and Energy, Shipping and Island Policy and the Governor of IAPR, No. A 1087 of 30 June 2022, published in the Official Government Gazette B 3489 of 5 July 2022.
- Joint Ministerial Decision of the Ministers of Finance, Development and Investment, Interior, Transport and Infrastructure and the Governor of IAPR, No. A 1119 of 11 August 2022, published in the Official Government Gazette B 4647 of 5 September 2022.
- Joint Ministerial Decision of the Ministers of Finance, Development and Investment, Digital Governance and the Governor of IAPR, No. A.1145 of 24 October 2022, published in the Official Government Gazette B 5535 of 26 October 2022, with number of electronic upload in Diaygeia ADA number: Ψ28I46MΠ3Z-NTN.
- Joint Ministerial Decision of the Ministers of Finance, Environment and Energy, Shipping and Island Policy and the Governor of IAPR, No. A.1185 of 28 December 2022, published in the Official Government Gazette B 6997 of 31 December 2022.
- Decision of the Head of the Directorate-General for Human Resources and Organisation of the IAPR, A 1140498 ΕΞ 2022 of 30 December 2022, published in the Official Government Gazette 1226 of 31 December 2022.

iii. A report by the Independent Authority for Public Revenue demonstrating how the system will contribute to better and faster targeting of the prosecuting custom services with central supervision and at the points of high interest.

Analysis:

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

In line with the description of the milestone:

Entry into force of 15 regulatory decisions / circulars adopted by the Independent Authority for Public Revenue on the design of a new integrated system for the fight against smuggling

Three decisions concerning the coordination and supervision of actions entered into force to combat smuggling:

- i. Act of the Council of Ministers 48 of 7 December 2020, for the establishment of a Government Committee for the formulation of the national strategy to deal with the smuggling of products subject to Excise Duty and Consumption Tax. The Act contains provisions concerning the operational supervision of the authorities responsible for the prosecution of smuggling, the definition of the specific objectives for combating the phenomenon and the monitoring of the implementation of the system for monitoring and electronic transmission of inflow-outflow data of liquid fuels and liquefied petroleum gases is in accordance with articles 53 and 53A of Law 2960/2001 (A' 265). The act of the Council of Ministers entered into force on the date of publication in the Official Government Gazette, on 24 December 2020, as there is no relevant article for entry into force. As a general rule and if not specified otherwise in the decision, the date of entry into force is the date of publication in the Official Government Gazette.
- ii. Joint Ministerial Decision 1027184 EX2021 of 31 March 2021, regarding the appointment of members of the Board of Management of the Coordinating Operational Center of the Independent Authority of Public Revenue, pursuant to article 6 of Law 4410/2016 (A' 141) which operates as a coordination centre between services to deal with the smuggling of products subject to excise duty and tax consumption. The term length of the Board shall be three years, starting from the date of upload of this Decision in the "Diageia" Programme, on 31 March 2021, as stated in the body of the decision and more precisely, point ΣΤ. The decision entered into force by adoption of the Joint Decision on 31 March 2021.
- iii. Decision of the Governor of IAPR A 1035448 EX 2022 of 21 April 2022, regarding the establishment of an additional Department in the Executive Service of Customs Controls of the General Directorate of Customs and Excise - "Department C - Central Operational Chamber", in order to provide the most effective support of operational actions to its organizational units related to prosecution checks in real time. IAPR Governor's Decision A 1035448 was published in the Government Gazette No. 2110 B' of 28 April 2022 and entered into force three months after publication, on 28 July 2022, as stated in the body of the decision and more precisely, point A.1.

Four decisions concerning the operation of electronic applications in the context of monitoring the movement of excise products:

- i. Joint Ministerial Decision No. A.1230 of 14 October 2021, delegated by par. 5 of Article 33 and par. 3 of article 63 of Law 2960/2001 (A' 265) regarding the modernization and updating of the procedures and specifications for the installation and control of integrated inflow-outflow monitoring systems in tax warehouses and customs warehouses for energy products, as well as the requirements for compliance, recording, operation and assurance of measurements and electronic data transmission and the type and content of the data provided by the this system in order to meet the needs of the market and to harmonize with

the procedures applicable in those establishments. Joint Ministerial Decision A.1230, that covers two regulatory provisions of law 4758/2020, namely provisions of articles 8 & 9, entered into force on the date of publication in the Official Government Gazette, on 22 October 2021, as provided by article 15.

- ii. Joint Ministerial Decision No. A.1016 of 28 January 2022, pursuant to par. 1 of article 26 of Law 4758/2020 (A' 242) which determined the terms, conditions and procedures for electronic inventory and control of the data of liquid fuel and LPG tanks of fuel stations and installations of heating oil sellers as well as other data relating to the service station or installation of a heating oil seller, in the application of the Register of Fuel Supply Stations Tanks and Heating Oil Sellers Facilities. Joint Ministerial Decision A.1016 entered into force on the date of publication in the Official Government Gazette, on 08 February 2022, as provided by article 9.
- iii. Joint Ministerial Decision No. A.1080 of 15 June 2022, pursuant to par. 1 of article 26 of Law 4758/2020 (A' 242) which determined the terms, conditions and procedure for electronic inventory and control of data of energy product tanks and other data related to tax and customs warehouses in the application of the Register of Energy Product Tanks of Tax Warehouses and Customs Warehouses of the Independent Authority for Public Revenue. This decision entered into force from the start date of operation of the new electronic platform of the Register of Energy Product Tanks of Tax and Customs Warehouses, as defined in par. 1 of article 8 of the Joint Ministerial Decision A. 1080 of 15 June 2022. The platform is also available in the following link: <https://www.aade.gr/epiheiriseis/forologikes-ypiresies/systima-eisroon-ekroon-kaysimon/forologikes-apothikes-kai-apothikes-teloneiakis-0>
- iv. Decision of the Head of the Directorate-General for Human Resources and Organisation of the IAPR No. ADR A 1140498 EX 2022 of 30 December 2022, regarding the establishment, constitution and appointment of members of a Project Management Team for the maturation and design of the project (investment) "TALOS Vehicle and Container Monitoring System" that the Independent Authority of Public Revenue is called upon to implement in the framework of the National Recovery and Resilience Plan "Greece 2.0" with the main objective of preventing and suppressing smuggling - especially in the fields of products that are subject to Excise Duties, through the integrated control of the movement of their means of transport on land and sea using modern technological methods. Joint Ministerial Decision 1226 entered into force on the date of publication in the Official Government Gazette, on 31 December 2022, as there is no relevant article for entry into force. As a general rule and if not specified otherwise in the decision, the date of entry into force is the date of publication in the Official Government Gazette.

The above-mentioned decisions concern the definition of the technical specifications for electronic application regarding the control of incoming – outgoing quantities from tax and customs warehouses in real time as well as the creation of registers for the electronic inventory of data of gas station tanks, tax warehouses and customs warehouses and the access of control authorities to these data. This contributes to ensuring better and comprehensive monitoring and control of storage and handling facilities for petroleum products, which is expected to contribute to the detection and targeting of dangerous cases of tax evasion. The project "TALOS Vehicle and Container Monitoring System" aims in particular at the electronic monitoring of the traffic of commercial vehicles and containers in the Greek territory, from the moment of their entry into the country until their exit.

This ensures the immediate and fuller coordination of customs control authorities and the enhancement of the effectiveness of preventive customs and prosecution controls carried out by them, while in addition this collected information material is expected to significantly facilitate the control of suspicious means of transport for possible transport of drugs, smuggled goods, etc.

Six decisions concerning the sanctioning framework in the context of detection violations of the legislation regarding excise duties products:

- i. Governor's Decision No. A.1079 of 15 June 2022, delegated by par. 4 of article 119A of Law 2960/2001 (A' 265) regarding the determination of the procedure, the instruments and the way of imposing the sealing and unsealing of the facilities of holders of a marketing license or a license for the retail trade of petroleum products, in case of possession, movement and marketing of adulterated fuels, as well as the need to determine the terms and conditions for the publication of the data of the offenders, the infringements, the sanctions, the manner, the time and the means of publication. Governor's Decision A.1079 entered into force on the date of publication in the Official Government Gazette, on 17 June 2022, as provided by article 9.
- ii. Joint Ministerial Decision No. A.1087 of 30 June 2022, pursuant to article 17A of Law 3054/2002 (A' 230). The decision concerns the determination of violations regarding the installation of an electronic geolocation system on floating means of supply - transport of marine fuel, the determination of the amount of fines, as well as the procedure and bodies for their enforcement and recovery. Joint Ministerial Decision A.1087 entered into force on the date of publication in the Official Government Gazette, on 5 July 2022, as provided by article 5.
- iii. Joint Ministerial Decision No. A. 1119 of 11 August 2022, pursuant to article 31 of Law 3784/2009 (A' 137), concerns the determination of procedures for the imposition of administrative fines and any other necessary detail by the competent authorities for carrying out audits, regarding violations of the provisions concerning integrated monitoring systems and electronic transmission of input and/or output data and their connection to a fiscal electronic mechanism at gas stations and heating oil vendors' facilities. Joint Ministerial Decision A.1119 was published in the Official Government Gazette on 05.09.2022, entered into force fifteen days after the publication, on 20.09.2022, as provided by article 7.
- iv. Joint Ministerial Decision No. A. 1145 of 24 October 2022, pursuant to par. 2 of article 26 of Law 4758/2020 (A' 242), regarding the specification of infringements concerning the obligation of electronic inventory of energy product tanks and other data of tax and customs warehouses in the application of the Register of Energy Product Tanks of Tax and Customs Warehouses of the Independent Authority for Public Revenue and the determination of the amount of administrative fines, the procedure and the competent enforcement authorities. This decision entered into force from the start date of operation of the new electronic platform of the Register of Energy Product Tanks of Tax and Customs Warehouses, as defined in par. 1 of article 8 of the Joint Ministerial Decision A. 1080 of 15 June 2022. The platform is also available in the following link: <https://www.aade.gr/epiheiriseis/forologikes-ypiresies/systema-eisroon-ekroon-kaysimon/forologikes-apothikes-kai-apothikes-teloneiakis-0>
- v. Joint Ministerial Decision No. A.1185 of 28 December 2022, pursuant to par. 5 of article 17A of Law 3054/2002 (A' 230), regarding the determination of the terms and conditions for the publication of the data of offenders and the respective violations and fines, the way, time and means of publication and the transmission of these data to the Coordinating Operational

Center, for violation of the provisions on the installation of an electronic geolocation system on floating means of maritime fuel logistics. Joint Ministerial Decision A.1185 entered into force on the date of publication in the Official Government Gazette, on 31.12.2022, as provided by article 6.

- vi. Governor's Decision No. A.1103 of 23 April 2021, pursuant to article 119B of Law 2960/2001 (A' 265), regarding the determination of a procedure for sampling seized manufactured tobacco, the procedure for examining samples and finalizing the results of the examination carried out in the competent laboratories of the General Chemical State Laboratory in order to establish a single delimited framework in order to achieve prevention, detecting, investigating and prosecuting illicit trafficking in tobacco products. Governor's Decision A.1103 entered into force on the date of publication in the Official Government Gazette, on 14 May 2021, as provided by article 7.

The above-mentioned decisions seek to take measures against offenders in the context of combating the trafficking of adulterated fuel and tackling the phenomenon of smuggling, in order to protect consumers. The specification of infringements and the establishment of a sanctioning framework ensures the compliance of businesses with the obligations provided for in the legislation regarding the movement of excise duty products and enhances the proper functioning of the petroleum products market.

Two decisions concerning the procedure for monitoring the movement of excise duty products:

- i. Governor's Decision No. A.1146 of 24 June 2021, pursuant to article 112A of Law 2960/2001 (A' 265) regarding the determination of the procedure for monitoring and controlling the quantities of energy products transported by tanker vehicles under a tax suspension regime and intended for export to third countries, in order to prevent the disposal of products intended for export within the territory. Governor's Decision A.1146 entered into force on 01 July 2021, as provided by article 4.
- ii. Governor's Decision No. A.1006 of 12 January 2021, pursuant to article 98A of Law 2960/2001 (A' 265) regarding the determination of the Weighted Average Retail Price (WARP) of fine-cut tobacco products and other smoking tobaccos, as defined in articles 94 and 95 of Law 2960/2001, on the basis of which the corresponding VAT for the year 2021 will be calculated, in cases of smuggling, importation from third countries by private individuals, production on special order without being intended for marketing, reception by postal parcels, free distribution for market research purposes. This Decision applies the WARP uniformly by the customs authorities and reduces the risk of loss of revenue. Governor's Decision A.1006 entered into force on the date of publication in the Official Government Gazette, on 27 January 2021, as provided by article 3.

The abovementioned decisions define the procedures for monitoring the movement of energy products intended for export and establish a single framework for the definition of WARP with the aim of preventing, detecting and prosecuting illegal trade in these products.

The decision / circulars entered into force shall concern the preparation of a new integrated system which shall support the audit process by monitoring customs transactions and procedures in real time.

The decisions related to the new system for the control of customs transactions and procedures in real time determine the conditions for the creation of an electronic register and electronic inventory (decisions No. A. 1016/28.01.2022, A.1080/15.06.2022) of data of tanks of gas stations, tax

warehouses and customs warehouses for energy products. The specifications of integrated systems for monitoring inflows and outflows in tax warehouses and customs warehouses for energy products are also defined in the decisions No. A.1230/2021, A.1016/2022 and A.1080/2022. The information contained in these systems shall be received and used in real time by the control authorities in the context of the fight against fuel smuggling, as outlined in the decision No. A.1230.

This system shall operate by aiming at better and faster targeting of the prosecuting custom services with central supervision at the points of high interest.

Three decisions, namely No. B. 48/07.12.2020, No. 1027184 EX2021/31.03.2021 and No. A 1035448 EX 2022/21.04.2022, pertain to the coordination and supervision of actions aimed at combating smuggling. The decision No. B. 48 sets up the Coordinating Operational Center of the IAPR, that operates as a coordination centre between services to deal with the smuggling of products subject to excise duty and tax consumption, seeking to enhance the supervision of the competent services involved in the prosecution of tax evasion and the coordination among prosecuting authorities, which in turn could provide better targeting of the prosecuting custom services as well as greater supervision. The decision No. A 1035448 aim to support operational actions of the organisational units of the General Directorate of Customs and Taxation, concerning real-time prosecution checks and monitoring by technical and digital means and applications of the geographical location of goods, land vehicles and floating means, which in turn could provide better and faster targeting of the prosecuting custom services. With the entry into force of these measures, improved strategic planning is achieved in terms of combatting smuggling, preventing tax evasion in excise duty products and ensuring supervision of the competent prosecuting authorities.

In addition, decision No. A. 1230 defines the technical specifications for electronic application regarding the control of incoming and outgoing quantities from tax and customs warehouses while decisions No. A. 1016 and No. A 1080 pertain the creation of registers for the electronic inventory of data of gas station tanks, tax warehouses and customs warehouses and the access of control authorities to these data. In such manner, better and comprehensive monitoring and control of storage and handling facilities for petroleum products is achieved, which will contribute to the detection and targeting of dangerous cases of tax evasion. Further, the decision No. ADR A 1140498 regarding the establishment, constitution and appointment of members of a Project Management Team for the maturation and design of the project "TALOS Vehicle and Container Monitoring System" aims at the electronic monitoring of the traffic of commercial vehicles and containers in the Greek territory, from the moment of their entry into the country until their exit.

This ensures the immediate and better coordination of customs control authorities and the enhancement of the effectiveness of preventive customs and prosecution controls carried out by the former, while this collected information material is expected to significantly facilitate the control of suspicious means of transport for possible illegal goods.

Further, in line with the description of the measure:

The reform aims to support the fight against smuggling, in particular for those products subject to excise duties (tobacco, alcohol, energy) through the modernisation of the Customs' tracking systems, audit processes, and equipment in order to increase the effectiveness of cargo audits.

Two decisions, namely No. A.1006 and No. A.1103, aim to support the fight against smuggling for the products subject to excise duties and specifically for tobacco products. In particular, decision

1103 sets out the procedure for sampling seized manufactured tobacco, examining the samples and finalizing the results of the examination carried out in the laboratories of the General Chemical State Laboratory in order to establish a single delimited framework to achieve prevention, detecting, investigating and prosecuting illicit trafficking in tobacco products. Similarly, decision 1006 determines the Weighted Average Retail Price (WARP) of fine-cut tobacco products and other smoking tobaccos and establishes a single framework for the definition of WARP with the aim of preventing, detecting and prosecuting illegal trade in these products.

As far as the energy products are concerned, decision No. A.1146 determines the procedure for monitoring and controlling the movement of energy products intended for export while decision No. A.1230 focuses on the modernization and updating of procedures and specifications for the installation and control of integrated inflow-outflow monitoring systems in tax warehouses and customs warehouses for energy products. This monitoring system should track the movement of energy products more effectively while collecting, recording and processing electronically all the data concerning inflows-outflows from the fuel tanks.

The decisions entered into force aim to enhance targeted monitoring audits conducted by the competent audit authorities, as well as efforts to strengthen tax compliance and discipline in the prescribed procedures and obligations.

The decision No. A 1140498 notes that the implementation of the TALOS vehicle and container monitoring system within the framework of works of the established Project Management Team for the design of this project, aims at the electronic monitoring of the traffic of commercial vehicles and containers in the Greek territory, from the moment of their entry into the country until their exit.

The information received are to be collected in real time online in the "Operations Center", which shall operate within the Executive Service of Customs Controls. This center enable the creation of a single registration database for all land Customs Authorities, containing information on incoming and outgoing vehicles. This is expected to provide real-time information to the Operational Center regarding the means of transport, the cargo handled, their transit time and the exact crossing point.

With this new integrated system, the real-time information received may be provided to develop scenarios for utilizing data in the context of prioritizing cases for the selection of dangerous companies involved in fuel trading.

In addition, the information system shall support the recording of check results for documentation purposes, and provide feedback on the success of specific targeting, as well as the need for possible readjustment. At the same time, it may be possible to register or upload audit data, including their results as well as findings from non-compliance, from audits carried out by other audit authorities outside the Independent Authority for Public Revenue.

The reform also requires the upgrade of IAPR's IT systems necessary to obtain information from European and national databases

The regulatory decisions required by the milestone have upgraded the IAPR's IT systems. In particular, Greece has issued decisions/circulars setting out the specifications needed to enable the IAPR's IT systems to obtain information from European and national databases. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled. Specifically,

Governor’s Decision No 1035448/ ΕΞ 2022 provides for the establishment of an additional Department, Department C, in the Executive Service for Customs Controls of the Directorate-General for Customs. The Department C will, among others, support the Directorate-General’s organizational units through access to information systems of the IAPR, as well as to the information systems of other services and of international organisations. Additionally, through this decision, the responsibilities of Department B, namely “Information Analysis and Operational Action Planning” of the Directorate-General for Customs, are redefined to also support, amongst others, the access to the information systems of the IAPR, as well as the extraction and exchange of information, through national, EU or international customs information systems. A precondition for the information exchange described above is the ability of national information systems and databases to interoperate. The decisions A.1230/14.10.2021 (Article 1), 1016/28.01.2022 (Articles 2 and 3) and A.1080/2022 (Articles 2 and 3) provide for the implementation of an integrated information system that will allow for this interoperability and data exchange with information systems such as monitoring systems for Liquid fuel and heating oil sellers, stock flow systems for Tax Warehouses and Customs Warehouses, TAXIS Integrated Information System, Customs Information Systems ICISnet and the Integrated Information System of ELENXIS Audit Services.

The above-mentioned decisions outline the specifications necessary to make specific IT systems compatible with the new integrated information system to be developed, including TAXIS Integrated Tax Information System (as also provided by decision No A.1080/15.06.2022), which interoperates with the European VIES platform.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 206	Related Measure: Reforming Public Administration (Measure ID: 16972)	
Name of the Milestone: Public administration – legislative framework to clarify mandates		
Qualitative Indicator: Entry into force of legal provisions modifying the legislative framework of the general government entities at central, regional and local level.		Time: Q3 2022
Context:		
<p>The objective of this reform is to modernise the Greek public administration and invest in its human resources by implementing five key actions, including putting in place a multi-level governance framework. This reform continues efforts to improve the efficiency and effectiveness of the public administration.</p> <p>Milestone 206 concerns the establishment of a multi-level governance allocation system aiming to clarify responsibilities between all public administration levels and address overlaps. This will be achieved through the adoption of a legislative framework streamlining the allocation of responsibilities among the central, regional and local level and their respective governance frameworks. The legal framework will set out the responsibility areas for each public sector entity relating to planning and implementation, including on functions such as resource assurance and monitoring and evaluation responsibilities.</p> <p>Milestone 206 is the second milestone or target of the reform, and it follows the completion of milestone 205, related to the establishment of a pilot rewarding system for civil servants. It will be</p>		

followed by milestone 207 and target 208, related to the establishment of a rewarding system across the public administration and the training of 250,000 civil servants. The reform has a final expected date for implementation on December 2025.

Following the completion of this milestone, in line with the description of the measure in the Council Implementing Decision, Greece will establish a strategic workforce planning framework and modernise hiring procedures to be able to carry out selection procedures in a fully digitalised manner. These are further steps of this reform that is not linked to the milestones and targets in the Council Implementing Decision.

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Copy of the publication in the Official Journal for the law on “Multi-level governance and risk management in the public sector and other provisions” (5013/2023, OJ A 12/19.01.2023). Article 45 confirms entry of force on the date of publication in the OJ (i.e. 19 January 2023).
- iii. Copy of the publication in the Official Journal for Ministerial Decision ΔΙΔΔΑ/Φ.30/οικ.4490 of the Minister of Interior, Official Journal B 1694/20.03.2023. Article 5 confirms entry of force on the date of publication in the OJ (i.e. 20 March 2023).

Analysis:

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

Entry into force of primary and secondary legislation to establish a multi-level governance allocation system aiming to clarify responsibilities between all public administration levels and address overlaps

The law on “Multi-level governance and risk management in the public sector and other provisions” (5013/2023, OJ A 12/19.01.2023) was published on 19 January 2023. According to Article 45 of Law 5013/2023, the law enters into force on the day of its publication, unless stated differently in specific provisions. Article 1 of Law 5013/2023 states that the objective of this law is to streamline the allocation of responsibilities between administrative levels in order to enhance the effectiveness of the public administration. Article 2 of Law 5013/2023 sets out that this law establishes the “National System of Multilevel Governance” as a new governance model, including common classification of public policies and systematic allocation of responsibilities for public sector entities. Article 4 of Law 5013/2023 states that the new “National System of Multilevel Governance” applies to the whole public sector, including to public sector entities not belonging to the general government. Article 5 of Law 5013/2023 defines the organisational/institutional set-up of the “National System of Multilevel Governance”, including that the General Directorate of Public Organisations (part of the General Secretariat of Human Resources of the Public Sector, Ministry of the Interior) has been assigned as the operational centre for the “National System of Multilevel Governance”.

The secondary legislation (Ministerial Decision ΔΙΔΔΑ/Φ.30/οικ.4490 of the Minister of Interior, Official Journal B 1694/20.03.2023) was published on 20 March 2023. According to article 5 of this

act, it enters into force on the day of its publication. Law 5013/2023 and its Article 17(1) enables the adoption of an act of secondary law to define the content and scope of the functional classification of public policies as set out in article 7 of Law 5013/2023. Adopted on that basis, the Ministerial Decision introduces a classification methodology for public policies carried out by multiple public entities bodies on the basis of four categories, as set out in the annex of this act. Article 17(2) of Law 5013/2023 enables the adoption of joint ministerial decision of Minister for Interior, Minister for Finance and Minister for Digital Governance for the operation of the multi-level governance’s information system, as set out in Article 15(5) of Law 5013/2023. However, the adoption of this secondary legislation is optional and its adoption is not considered necessary to fulfil the milestone. Therefore, all necessary secondary legislation was adopted.

Revised legal framework shall set out the responsibility areas for each entity relating to planning and implementation, including on functions such as resource assurance and monitoring and evaluation responsibilities

Article 7 of Law 5013/2023, provides for a uniform methodology for the allocation of policy areas and responsibilities for all public sector entities operating at the central, regional and local levels. Article 7 sets out that the methodology of COFOG (Government expenditure by function) shall be used when each public entity defines the public policies falling under their respective responsibility. Further, Article 7 sets out that the responsibility areas to be confirmed for each public sector entity are grouped in the following categories: (i) executive (incl. strategic planning and simplification of procedures); (ii) supportive (incl. financial operation and human resources management); (iii) implementation (incl. licensing to citizens, licensing to businesses and certifications) (iv) audit (incl. inspections and internal controls); and (v) policy monitoring and evaluation of results.

Article 3 of the secondary legislation (Ministerial Decision ΔΙΔΔΑ/Φ.30/οικ.4490 of the Minister of Interior, Official Journal B 1694/20.03.2023) elaborates on parameters to be considered to determine the possible transfer or redistribution of responsibilities amongst public sector entities, including for responsibility areas relating to planning and implementation, including on functions such as resource assurance and monitoring and evaluation, as set out in Article 7 of Law 5013/2023 (see previous paragraph). Finally, Article 4 of the Ministerial Decision sets out that all public sector entities need to submit the requested information to the Ministry of Interior within six months of the secondary act’s publication (i.e. by 20 September 2023), in order for the multilevel governance allocation system to be managed by the Ministry of Interior (Article 15, Law 5013/2023) to become operational.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 209	Related Measure: Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption - Efficient Combating of Corruption (Measure ID: 16978)	
Name of the Milestone: Asset declarations and political parties		
Qualitative Indicator: Entry into force of new legislation		Time: Q3 2022
Context:		

The objective of this reform is to improve the legal response to corruption by undertaking a series of amendments in Greece's relevant legal framework. This covers asset declarations, the codification of the legislation related to political parties, protection of persons who report breaches of Union Law, and amendments in the Criminal Code and Code of Criminal Procedure.

Milestone 209 requires the entry into force of the new legislation regarding asset declarations and the codification of legislation on political parties.

Milestone 209 is the only milestone or target of this reform.

In line with the description of the measure in the Council Implementing Decision, Greece has also adopted a new law amending the Criminal Code and the Code of Criminal Procedure, and a new law on the protection of persons who report breaches of Union Law transposing EU Directive 2019/1937. This is a further step of this reform that is not linked to the milestones and targets in the Council Implementing Decision.

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Copy of Law 5026/2023, Official Journal A 45/28.02.2023, "Submission of asset declarations and declarations of financial interests".
- iii. Copy of Presidential Decree 15/2022, Official Journal A 39/01.03.2022, "Codification in a single text of the provisions of the legislation on the financing of political parties and party coalitions".
- iv. Copy of Decision 4122 of the Hellenic Parliament Chair, reference 2957, Official Journal Y.O.Δ.Δ. 292/31.03.2023, "Establishment of the Committee for the audit of asset declarations and declarations of financial interests".
- v. Copy of Decision 4737 of the Hellenic Parliament Plenary, reference 3427, Official Journal A 89/12.04.2023, "Regulation of the Audit Committee".
- vi. Copy of Decision 3814 of the Hellenic Parliament Plenary, reference 1834, Official Journal A 33/28.02.2019, "Regulation of the asset declarations Special Audit Unit".
- vii. Copy of Decision 1737 of the Hellenic Parliament Plenary, Official Journal A 51/10.04.1997, "Regulation of the Parliament".
- viii. Copy of Decision 10425 of the Hellenic Parliament Chair, the Minister and Deputy Minister of Finance and the Minister of Justice, reference 7113, Official Journal B 3947/15.09.2020, "Single Regulation of asset declarations audit procedures".
- ix. Copy of Decision 17991 of the Minister of Justice, the Minister of State, the Deputy Minister of Finance and the Governor of the Independent Authority for Public Revenue, Official Journal B 2963/04.05.2023, "Specification of the provisions for the submission of asset declarations".
- x. Copy of Decision 17992 of the Minister of Justice, the Minister of State, the Deputy Minister of Finance and the Governor of the Independent Authority for Public Revenue, Official Journal B 2964/04.05.2023, "Determination of the type and content of the declaration of economic interests".

- xi. Copy of Decision 17994 of the Minister of Justice and the Deputy Minister of Finance, Official Journal B 3081/09.05.2023, "Subject matter of the publication of asset declarations and the data to be published".
- xii. Copy of Decision 113523 of the Minister of Justice and the Deputy Minister of Finance, Official Journal B 2834/15.12.2011, "Determination of the procedure for seizing assets and prohibiting assets sales".

The authorities also provided:

- i. Copy of Law 4855/2021, Official Journal A 215/12.11.2021, "Amendments in the Criminal Code and the Code of Criminal Procedure".
- ii. Copy of Law 4990/2022, Official Journal A 210/11.11.2022, "Protection of persons reporting breaches of Union Law".

Analysis:

The justification and substantiating evidence provided by Greece covers all constitutive elements of the milestone.

This is demonstrated in the sections below.

Entry into force of the new legislation regarding asset declarations.

Law 5026/2023 on the submission of asset declarations and declarations of financial interests entered into force with its publication on 28 February 2023 (as provided by article 60). The new law's stated objectives are to increase - over a period of three years - the percentage of asset declarations audited annually to at least 7% of all asset declarations submitted, to improve the quality and effectiveness of audits, to eliminate the fragmentation of responsibilities by granting the competence and supervision to a single audit body (the Audit Committee), and to reduce the administrative burden of the submission and audit procedure.

Article 45 of the new asset declarations law also provides for the adoption of secondary legislation through enabling provisions. In this respect, the authorities either adopted new acts where necessary or kept in force existing acts that were already adopted previously and that could cover the provisions of the new law. The latter approach is allowed as per Article 44 of the law (transitional provisions), which set outs that the acts already adopted on the basis of the previous legislative framework shall remain in force, provided that they do not contradict the provisions of the new law.

The new legislation adopted concerned the following.

- i. Specification of the provisions for the submission of asset declarations, as provided in the relevant Decision of the Minister of Justice, the Minister of State, the Deputy Minister of Finance and the Governor of the Independent Authority for Public Revenue (17991, Official Journal B 2963/04.05.2023; entered into force with its publication on 4 May 2023, as provided by article 11).
- ii. Determination of the type and content of the declaration of economic interests, as provided in the relevant Decision of the Minister of Justice, the Minister of State, the Deputy Minister of Finance and the Governor of the Independent Authority for Public Revenue (17992, Official Journal B 2964/04.05.2023; entered into force with its publication on 4 May 2023, as provided by article 2).
- iii. Rules of procedure of the Audit Committee, as provided in the relevant Decision of the Hellenic Parliament Plenary (4737, Official Journal A 89/12.04.2023).

- iv. Publication of asset declarations' information, as provided in the relevant Decision of the Minister of Justice and the Deputy Minister of Finance (17994, Official Journal B 3081/09.05.2023; entered into force with its publication on 9 May 2023, as provided by article 2).

The aforementioned newly adopted legislation was complemented by the following existing legislation.

- i. Financial management rules, as provided in the relevant Decision of the Hellenic Parliament Plenary (1737, Official Journal A 51/10.04.1997; entered into force with its publication on 10 April 1997, as provided by article 159).
- ii. Organisation of the asset declarations special audit unit, as provided in the relevant Decision of the Hellenic Parliament Plenary (3814, Official Journal A 33/28.02.2019).
- iii. Regulation of asset declarations audit procedures, as provided in the relevant Decision of the Hellenic Parliament Chair, the Minister and Deputy Minister of Finance and the Minister of Justice (10425, Official Journal B 3947/15.09.2020; entered into force with its publication on 15 September 2020, as provided by article 2).
- iv. Procedure for seizing assets and prohibiting assets sales, as provided in the relevant Decision of the Minister of Justice and the Deputy Minister of Finance (113523, Official Journal B 2834/15.12.2011).

Entry into force of the codification of legislation on political parties.

Presidential Decree 15/2022 that codifies the political parties' legislation, entered into force with its publication on 1 March 2022 (as provided by article 27). Particularly, the codification concerns the inclusion in a single text of legislative provisions on State financing of political parties and parties' coalition and parliament members, specifically as regards: (i) the revenue, expenditure and audit of the finances of political parties and parties' coalitions; (ii) the revenue, expenditure, audit of the finances and electoral campaign of candidates and elected members of the Hellenic Parliament and the European Parliament. Overall, the codification aims at enabling the different actors concerned to be aware of and manage their rights and obligations, and providing a comprehensive and clear framework for administrative services involved in the implementation of the relevant provisions.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 210	Related Measure: Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption – Strengthening the National Anti-Corruption Framework through targeted interventions in the fields of detection, prevention and raising awareness (Measure ID: 16952)	
Name of the Milestone: National anti-corruption action plan		
Qualitative Indicator: Adoption by the National Transparency Authority of National Anti-Corruption Action Plan for the period 2022-2025		Time: Q3 2022
Context:		

The measure aims to detect and prevent corruption and consists of the following actions to be implemented by the National Transparency Authority: (i) strengthening the audit framework for detecting fraud and corruption; (ii) regulatory interventions in key policy fields, namely whistle-blowers protection, lobbying, and conflicts of interest; (iii) the strengthening of the internal control system and the establishment of a national network of integrity advisors in the public administration; (iv) the development of ethics and deontology codes, and the revision of disciplinary processes; (v) initiatives to raise awareness against fraud and corruption; (vi) the adoption of the National Anti-Corruption Action Plan for the period 2022-2025; and (vii) projects to finance the authority's digital and infrastructure capacities.

Milestone 210 requires the adoption by the National Transparency Authority of the National Anti-Corruption Action Plan for the period 2022-2025, including the specification of: (i) actions to enhance transparency and accountability across public administration; (ii) targeted interventions to detect and prevent corruption in high-risk areas; (iii) necessary regulatory interventions in selected policy fields.

Milestone 210 is the first step of the implementation of the reform and it is accompanied by Milestone 211 in this payment request related to the implementation of the Internal Controls law, which is the final milestone of the reform. The reform has a final expected date for implementation on 31 December 2025.

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Copy of Law 4915/2022, Official Journal A 63/24.03.2022, "National Anti-Corruption Action Plan 2022-2025".
- iii. Copy of Act 19 of the Ministers' Council, Official Journal A 138/13.07.2022, "Approval of National Anti-Corruption Action Plan 2022-2025" link: <https://aead.gr/images/manuals/esskd/2022-2025/fek-2022-A-138-esskd.pdf>.
- iv. Copy of explanatory report by the National Transparency Authority demonstrating how the actions foreseen in the National Anti-Corruption Action Plan 2022-2025 contribute to achieving the objectives of the reform.

Analysis:

The justification and substantiating evidence provided by Greece covers all constitutive elements of the milestone.

Adoption by the National Transparency Authority of the National Anti-Corruption Action Plan for the period 2022-2025.

Law 4915/2022 entered into force with its publication on 24 March 2022 (as provided by article 112). The law provides that the National Anti-Corruption Action Plan 2022-2025 shall be drawn up and adopted by the National Transparency Authority, which shall be responsible for monitoring the

progress and coordinating the implementation of its actions, with the cooperation of all competent bodies.

Moreover, Act 19 of the Ministers' Council (13 July 2022), provided for the approval of the National Anti-Corruption Action Plan 2022-2025 by that Council, as adopted by the National Transparency Authority (version of March 2022)).

The National Anti-Corruption Action Plan 2022-2025 shall include the specification of actions to enhance transparency and accountability across public administration.

The National Anti-Corruption Action Plan 2022-2025 includes three parts: (i) enhancing the audit / investigations framework; (ii) strengthening integrity, accountability, and transparency; and (iii) citizens' engagement. The second part concerns the strategic objective of enhancing transparency and accountability across public administration, with focused targets and actions. For example, such targets regard the reinforcement of the institutional and regulatory framework, the upgrade of strategic planning, the strengthening of the coordination and assessment mechanisms, the enhancement of operational capacities, and the development of digital tools and digital transformation actions. These targets will be realised through 64 distinct and defined actions, allocated to public bodies indicated in the plan that are responsible for their implementation.

The National Anti-Corruption Action Plan 2022-2025 shall include targeted interventions to detect and prevent corruption in high-risk areas (including, for example, health, public finances, investments).

The National Anti-Corruption Action Plan 2022-2025 includes targeted interventions to detect and prevent corruption in high-risk areas, among others, related to health, public finances, and investments. More specifically:

- i. Health: Ratification of the MEDICRIME Convention of the Council of Europe, with the aim of combating counterfeit medicinal products; codification, amendment or supplementing of the existing general and special provisions of the disciplinary law for health professionals in the national health system to enhance clarity and complement the current framework where needed; code of ethics for the employees of the Ministry of Health; mapping of the provisions that regulate issues of conflict of interest and integrity violations in legal entities supervised by the Ministry of Health; assessment of integrity risks in administrative procedures of the Ministry of Health; implementation of information and awareness raising actions on corruption issues in the medical sector and its consequences in the health system.
- ii. Public finances: Strengthening the legislative and institutional framework for asset recovery and management; establishing rules to facilitate the use of financial and other information for the prevention, detection, investigation or prosecution of certain criminal offences; ensuring access of public authorities and the public to adequate, accurate and up-to-date information on the beneficial owners of legal entities through the central register of beneficial owners; modernization of the institutional framework for the operation and monitoring of public enterprises and organizations, and public shareholdings; various actions concerning the Ministry of Finance and the Independent Authority for Public Revenue, such as the latter's updated anti-corruption action plan 2022 - 2025, as well as the development, enhancements and access to information and management systems; development of a strategy for the fight against corruption and fraud with regards to the implementation of the Recovery and Resilience Facility.

- iii. Public and private investments: Access of National Transparency Authority’s auditors to the general electronic commercial registry of the Ministry of Development and Investments; codification of consumer protection legislation; development of a general methodology and standardization of procedures for the implementation of Public Private Partnerships; development of a Code of Ethics and Conduct for civil servants working in public procurement; development of an integrated information system for the management and monitoring of Public Private Partnerships.

The National Anti-Corruption Action Plan 2022-2025 shall include necessary regulatory interventions in selected policy fields.

The National Anti-Corruption Action Plan 2022-2025 includes regulatory interventions in selected policy fields, such as public administration, education, migration and asylum, justice, and media, notably concerning: Regulation for the establishment of an external reporting channel for the receipt and handling of reports of violations (whistle-blowers); introduction of a regulation on the obligation to maintain and publish a list of sponsorships received by non-governmental organisations active in the field of migration and asylum; issuance of regulatory acts for the application and implementation of the provisions regarding the monitoring of disciplinary cases; update of the regulatory framework and implementation of the licensing process for media service providers and radio stations, and integration of the European Media Act; implementation of the legislative regulations concerning the office for the collection and processing of statistical data in the field of Justice (JustStat); adoption of a code of legislation on the disciplinary law for academic staff; codification of legislation on spatial and urban planning, forestry, local government entities, and asylum and migration.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 211	Related Measure: Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption – Strengthening the National Anti-Corruption Framework through targeted interventions in the fields of detection, prevention and raising awareness (Measure ID: 16952)	
Name of the Milestone: Internal Controls law implementation		
Qualitative Indicator: - Report by the National Transparency Authority on internal control systems established - Regulatory acts issued - Joint Ministerial Decision issued		Time: Q4 2022
Context:		
The measure aims to detect and prevent corruption and consists of the following actions to be implemented by the National Transparency Authority: (i) strengthening the audit framework for detecting fraud and corruption; (ii) regulatory interventions in key policy fields, namely whistle-blowers protection, lobbying, and conflicts of interest; (iii) the strengthening of the Internal Control System and the establishment of a national network of integrity advisors in the public administration; (iv) the development of ethics and deontology codes, and the revision of disciplinary processes; (v) initiatives to raise awareness against fraud and corruption; (vi) the adoption of the		

National Anti-Corruption Action Plan for the period 2022-2025; and (vii) projects to finance the authority's digital and infrastructure capacities.

Milestone 211 concerns the implementation of the new Law on Internal Controls in public administration, including: (i) the establishment of internal audit units in line Ministries; (ii) the issuance of the regulatory acts for the establishment of internal audit units and audit committees in local government entities (1st and 2nd degree) and their legal entities, universities, hospitals - health units, independent authorities; (iii) the issuance of a Joint Ministerial Decision to set the criteria for the cooperation of internal audit units with external experts. The milestone further requires that the National Transparency Authority in cooperation with the Ministry of Interior provides oversight and guidance to general government entities to put in place a coherent and functioning Internal Control system and facilitates a pilot self-assessment of the basic elements of the Internal Control system, and that the Hellenic Court of Auditors includes in its annual work plan audits on internal control arrangements.

Milestone 211 is the second and last milestone of the reform, and it follows Milestone 210 part of this payment request, which is related to the adoption of the National Anti-Corruption Action Plan for the period 2022-2025.

Following the completion of milestone 211, in line with the description of the measure in the Council Implementing Decision, Greece additionally intends to: (i) strengthen the audit framework for detecting fraud and corruption; (ii) implement regulatory interventions in key policy fields, namely whistle-blowers protection, lobbying, and conflicts of interest; (iii) establish a national network of integrity advisors in the public administration; (iv) develop ethics and deontology codes, and the revision of disciplinary processes; (v) introduce initiatives to raise awareness against fraud and corruption; and (vi) implement projects to finance the National Transparency Authority's digital and infrastructure capacities. These are further steps of this reform that are not required by the milestones and targets in the Council Implementing Decision.

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Copy of Law 4795/2021, Official Journal A 62/17.04.2021, "Internal Control System in public administration".
- iii. Copy of Law 4622/2019, Official Journal A 133/07.08.2019, "Executive State: organisation, operation and transparency of the government, government bodies and central public administration".
- iv. Copy of Decision 12158 of the Minister of Tourism and the Governor of the National Transparency Authority, Official Journal B 3397/28.07.2021, "Establishment of an Internal Audit Unit in the Ministry of Tourism".
- v. Copy of Decision ΥΠΠΟΑ/ΓΡΥΠ/237518/6051 of the Minister of Culture and Sports and the Governor of the National Transparency Authority, Official Journal B 2024/26.05.2020, "Establishment of an Internal Audit Unit in the Ministry of Culture and Sports".
- vi. Copy of Decision 26193/Δ1.8581 of the Minister of Labour and Social Affairs and the Governor of the National Transparency Authority, Official Journal B 2744/04.07.2020, "Establishment of an Internal Audit Unit in the Ministry of Labour and Social Affairs".

- vii. Copy of Decision 1358/193758 of the Minister of Rural Development and Food and the Governor of the National Transparency Authority, Official Journal B 3044/22.07.2020, "Establishment of an Internal Audit Unit in the Ministry of Rural Development and Food".
- viii. Copy of Decision 81764 of the Minister of Interior and the Governor of the National Transparency Authority, Official Journal B 5306/03.12.2020, "Establishment of an Internal Audit Unit in the Ministry of Interior".
- ix. Copy of Decision 2523 ΕΞ 2021 of the Minister of Finance and the Governor of the National Transparency Authority, Official Journal B 76/15.01.2021, "Establishment of an Internal Audit Unit in the Ministry of Finance".
- x. Copy of Decision Α1ε/Γ.Π.44282 of the Minister of Health, Official Journal B 3228/04.08.2020, "Establishment of an Internal Audit Unit in the Ministry of Health".
- xi. Copy of Decision 139240/Y1 of the Minister of Education and Religious Affairs, Official Journal B 4631/21.10.2020, "Establishment of an Internal Audit Unit in the Ministry of Education and Religious Affairs".
- xii. Copy of Decision ΥΠ 254 of the Minister of Climate Crisis and Civil Protection, Official Journal B 2140/03.04.2023, "Establishment of an Internal Audit Unit in the Ministry for Climate Crisis and Civil Protection".
- xiii. Copy of Decision 115223 of the Minister of Infrastructure and Transport, Official Journal B 1996/14.05.2021, "Establishment of an Internal Audit Unit in the Ministry of Infrastructure and Transport".
- xiv. Copy of Decision ΥΠΕΝ/ΔΝΕΠ/98493/3639 of the Minister of Environment and Energy, Official Journal B 5041/01.11.2021, "Establishment of an Internal Audit Unit in the Ministry of Environment and Energy".
- xv. Copy of Presidential Decree 5/2022, Official Journal A 15/04.02.2022, "Organisation of the Ministry of Development and Investments".
- xvi. Copy of Presidential Decree 40/2020, Official Journal A 85/15.04.2020, "Organisation of the Ministry of Digital Governance".
- xvii. Copy of Presidential Decree 106/2020, Official Journal A 255/23.12.2020, "Organisation of the Ministry for Migration and Asylum".
- xviii. Copy of Presidential Decree 6/2021, Official Journal A 7/15.01.2021, "Organisation of the Ministry of Justice".
- xix. Copy of Law 4781/2021, Official Journal A 31/28.02.2021, "Organisation and operation of the Ministry of Foreign Affairs".
- xx. Copy of Decision ΓΔΟΕΣ/1/2/423-α' of the Minister of Citizen Protection, the Minister of Administrative Reconstruction, and the Alternate Minister of Finance, Official Journal B 2351/18.06.2019, "Establishment of an Internal Audit Unit in the Ministry of Citizen Protection".
- xxi. Copy of Decision 800/265/139770 of the Minister of National Defence, the Minister of Administrative Reform and Digital Governance, and the Alternate Minister of Finance, Official Journal B 3465/23.12.2014, "Establishment of an Internal Audit Unit in the Ministry of National Defence".
- xxii. Copy of Presidential Decree 13/2018, Official Journal A 26/20.02.2018, "Organisation of the Ministry of Maritime Affairs and Insular Policy".
- xxiii. Copy of Decision 86218 of the Minister and Alternate Minister of Interior, Official Journal B 6506/19.12.2022, "Establishment of Internal Audit Units in 1st degree local government entities and their legal entities".

- xxiv. Copy of Decision 86288 of the Minister and Alternate Minister of Interior, Official Journal B 6506/19.12.2022, "Establishment of Internal Audit Units in 2nd degree local government entities and their legal entities".
- xxv. Copy of Law 4957/2022, Official Journal A 141/21.07.2022, "New horizons for higher education institutions".
- xxvi. Copy of Decision 36804 of the Minister and Alternate Minister of Health, Official Journal B 3448/04.07.2022, "Establishment of Internal Audit Units in entities supervised by the Ministry of Health".
- xxvii. Copy of Law 4940/2022, Official Journal A 112/14.06.2022, "System of targeting, evaluation and reward for enhancing the efficiency of public administration".
- xxviii. Copy of Decision 90264 of the Minister of Finance, and the Minister and Alternate Minister of Interior, Official Journal B 6873/29.12.2022, "Establishment of Audit Committees in 1st degree local government entities and their legal entities".
- xxix. Copy of Decision 90268 of the Minister of Finance, and Minister and Alternate Minister of Interior, Official Journal B 6873/29.12.2022, "Establishment of Audit Committees in 2nd degree local government entities and their legal entities".
- xxx. Copy of Decision ΓΓΑΔΔΤ 742 of the Minister of Finance and the Minister of Interior, Official Journal B 6918/30.12.2022, "Establishment of Audit Committees in universities".
- xxxi. Copy of Decision ΓΓΑΔΔΤ 743 of the Minister of Finance and the Minister of Interior, Official Journal B 6918/30.12.2022, "Establishment of Audit Committees in entities supervised by the Ministry of Health".
- xxxii. Copy of Decision ΓΓΑΔΔΤ 741 of the Minister of Finance and the Minister of Interior, Official Journal B 6918/30.12.2022, "Establishment of Audit Committees in independent authorities".
- xxxiii. Copy of Decision ΓΓΑΔΔΤ 358/9388 of the Minister of Finance and the Minister of Interior, Official Journal B 3093/17.06.2022, "Additional conditions, obligations and impediments for the award of services to a natural or legal person for the support of the Internal Audit Units".
- xxxiv. Copy of amending Decision ΓΓΑΔΔΤ 65/OIK.1682 of the Minister of Finance and the Minister of Interior, Official Journal B 520/02.02.2023, "Additional conditions, obligations and impediments for the award of services to a natural or legal person for the support of the Internal Audit Units".
- xxxv. Copy of report by the National Transparency Authority, December 2022, "Oversight and guidance on the development of a coherent and functioning internal control system in general government entities".
- xxxvi. Copy of report by the National Transparency Authority, version 1.0, December 2022, "Internal control system maturity assessment - pilot implementation".
- xxxvii. Copy of Hellenic Court of Auditors' annual audit plan for year 2022.

Analysis:

The justification and substantiating evidence provided by Greece covers all constitutive elements of the milestone.

In line with the requirements of the Council Implementing Decision, Greece has adopted the necessary acts to follow up on the implementation of the new Law on internal controls in public administration (Law 4795/2021) entered into force with its publication on 17 April 2021, as provided by article 84.

The establishment of internal audit units in line Ministries.

Internal audit units in line Ministries were established with the following acts.

- i. Decision 12158 of the Minister of Tourism and the Governor of the National Transparency Authority establishing an Internal Audit Unit in the Ministry of Tourism (entered into force with its publication on 28 July 2021, as provided by article 3).
- ii. Decision ΥΠΠΟΑ/ΓΡΥΠ/237518/6051 of the Minister of Culture and Sports and the Governor of the National Transparency Authority establishing an Internal Audit Unit in the Ministry of Culture and Sports (entered into force with its publication on 26 May 2020, as provided by paragraph 5).
- iii. Decision 26193/Δ1.8581 of the Minister of Labour and Social Affairs and the Governor of the National Transparency Authority establishing an Internal Audit Unit in the Ministry of Labour and Social Affairs (published on 4 July 2020, entered into force with the start of operation of the Internal Audit Unit as per Law 4622/2019, as provided by article 3).
- iv. Decision 1358/193758 of the Minister of Rural Development and Food and the Governor of the National Transparency Authority establishing an Internal Audit Unit in the Ministry of Rural Development and Food (entered into force with its publication on 22 July 2020, as provided by article 5).
- v. Decision 81764 of the Minister of Interior and the Governor of the National Transparency Authority establishing an Internal Audit Unit in the Ministry of Interior (entered into force with its publication on 3 December 2020, as provided by paragraph 3).
- vi. Decision 2523 ΕΞ 2021 of the Minister of Finance and the Governor of the National Transparency Authority establishing an Internal Audit Unit in the Ministry of Finance (entered into force with its publication on 15 January 2021, as provided by article 5).
- vii. Decision Α1ε/Γ.Π.44282 of the Minister of Health establishing an Internal Audit Unit in the Ministry of Health (entered into force with its publication on 4 August 2020, as provided by article 2).
- viii. Decision 139240/Υ1 of the Minister of Education and Religious Affairs establishing an Internal Audit Unit in the Ministry of Education and Religious Affairs (entered into force the next day of its publication on 21 October 2020, as provided by article 4).
- ix. Decision ΥΠ 254 of the Minister of Climate Crisis and Civil Protection establishing an Internal Audit Unit in the Ministry for Climate Crisis and Civil Protection (entered into force with its publication on 3 April 2023, as provided by paragraph 2).
- x. Decision 115223 of the Minister of Infrastructure and Transport establishing an Internal Audit Unit in the Ministry of Infrastructure and Transport (entered into force with its publication on 14 May 2021, as provided by paragraph 4).
- xi. Decision ΥΠΕΝ/ΔΝΕΠ/98493/3639 of the Minister of Environment and Energy establishing an Internal Audit Unit in the Ministry of Environment and Energy (entered into force with its publication on 1 November 2021, as provided by paragraph 4).
- xii. Presidential Decree 5/2022 on the organisation of the Ministry of Development and Investments, establishing an Internal Audit Unit in the Ministry (entered into force 30 days after its publication on 4 February 2022, as provided by article 87).
- xiii. Presidential Decree 40/2020 on the organisation of the Ministry of Digital Governance, establishing an Internal Audit Unit in the Ministry (entered into force with its publication on 15 April 2020, as provided by article 62).
- xiv. Presidential Decree 106/2020 on the organization of the Ministry for Migration and Asylum, establishing an Internal Audit Unit in the Ministry (entered into force with its publication on 23 December 2020, as provided by article 64).
- xv. Presidential Decree 6/2021 on the organisation of the Ministry of Justice, establishing an Internal Audit Unit in the Ministry (entered into force with its publication on 15 January 2021, as provided by article 57).

- xvi. Law 4781/2021 on the organisation and operation of the Ministry of Foreign Affairs, establishing an Internal Audit Unit in the Ministry (entered into force with its publication on 28 February 2021, as provided by article 492).

Beyond the requirements of the law, the Ministries of Citizen Protection, National Defence, and Maritime Affairs and Insular Policy have established their own internal control mechanisms that are tailored to the specificities and nature of their operations. Specifically:

- i. Decision ΓΔΟΕΣ/1/2/423-α' of the Minister of Citizen Protection, the Minister of Administrative Reconstruction, and the Alternate Minister of Finance, establishing an Internal Audit Unit in the Ministry of Citizen Protection (entered into force with its publication on 18 June 2019, as provided by article 2).
- ii. Decision 800/265/139770 of the Minister of National Defence, the Minister of Administrative Reform and Digital Governance, and the Alternate Minister of Finance, establishing an Internal Audit Unit in the Ministry of National Defence (entered into force with its publication on 23 December 2014, as provided by article 9).
- iii. Presidential Decree 13/2018 on the organisation of the Ministry of Maritime Affairs and Insular Policy, establishing an Internal Audit Unit in the Ministry (entered into force one month after its publication on 20 February 2018, as provided by article 94).

The issuance of the regulatory acts for the establishment of internal audit units and audit committees in local government entities (1st and 2nd degree) and their legal entities.

Internal audit units

Decision 86218 of the Minister and Alternate Minister of Interior (entered into force with its publication on 19 December 2022, as provided by article 8), provides for the criteria and framework for the establishment of internal audit units in 1st degree local government entities and their legal entities. Moreover, Decision 86288 of the Minister and Alternate Minister of Interior (entered into force with its publication on 19 December 2022, as provided by article 7), provides for the criteria and framework for the establishment of internal audit units in 2nd degree local government entities and their legal entities. In both Decisions, the criteria concern the number of permanent staff and the budget of the local government entities. According to these Decisions and Law 4795/2021, local government entities that do not fall under such criteria may either: (i) establish a common internal audit unit with another local government entity; or (ii) be subject to the internal audit unit of their competent supervising body; or (iii) appoint an external third party to conduct the internal audit activities. The Decisions also provide for the organisation and staffing of the internal audit units, the monitoring of implementation by the National Transparency Authority, as well as provisions on the legal entities supervised by the local government entities.

Audit committees

Decision 90264 of the Minister of Finance, and the Minister and Alternate Minister of Interior (entered into force with its publication on 29 December 2022, as provided by article 11), provides for the criteria and framework for the establishment of audit committees in 1st degree local government entities and their legal entities. Moreover, Decision 90268 of the Minister of Finance, and Minister and Alternate Minister of Interior (entered into force with its publication on 29 December 2022, as provided by article 11), provides for the criteria and framework for the establishment of audit committees in 2nd degree local government entities and their legal entities. Both Decisions specify how such committees are set up, the qualifications and mandate of their members, as well as the competences and operational arrangements of the audit committees in local government entities.

In this respect, the Law on Internal Control in public administration (Law 4795/2021) in conjunction with the aforementioned acts that are adopted based on that Law, provide specific requirements as demonstrated above to establish internal audit units and audit committees in local government entities and their legal entities.

Altogether, the legal acts mentioned above provide for legal obligations for such public bodies to set up the relevant internal audit units and audit committees (this is applicable to the rest of the public bodies as mentioned in the sections below, notably universities, hospitals - health units, and independent authorities).

The issuance of the regulatory acts for the establishment of internal audit units and audit committees in universities.

Internal audit units

In accordance with article 213 of Law 4957/2022 (that article entered into force with the Law's publication on 21 July 2022, as provided by article 489), each university is obliged to establish an internal audit unit, which is an autonomous and independent administrative structure of the university and reports directly to the University Rector, as the head of the institution.

Audit committees

Decision ΓΓΑΔΔΤ 742 of the Minister of Finance and the Minister of Interior (entered into force with its publication on 30 December 2022, as provided by article 11), provides for the criteria and framework for the establishment of audit committees in universities. This Decision specifies how such committees are set up, the qualifications and mandate of their members, as well as the competences and operational arrangements of the audit committees in universities.

The issuance of the regulatory acts for the establishment of internal audit units and audit committees in hospitals - health units.

Internal audit units

Decision 36804 of the Minister and Alternate Minister of Health, (entered into force with its publication on 4 July 2022, as provided by article 7) provides for the criteria and framework for the establishment of internal audit units in entities supervised by the Ministry of Health, notably hospitals and health units. The criteria set out in this Decision concern the number of staff and the budget, while the Decision also provides for the organisation, staffing and operation of the internal audit units in hospitals - health units.

Audit committees

Decision ΓΓΑΔΔΤ 743 of the Minister of Finance and the Minister of Interior (entered into force with its publication on 30 December 2022, as provided by article 11), provides for the criteria and framework for the establishment of audit committees in entities supervised by the Ministry of Health, notably hospitals and health units. This Decision specifies how such committees are set up, the qualifications and mandate of their members, as well as the competences and operational arrangements of the audit committees in hospitals - health units.

The issuance of the regulatory acts for the establishment of internal audit units and audit committees in independent authorities.

Internal audit units

Article 42 of Law 4940/2022 (that article entered into force with the Law's publication on 14 June 2022, as provided by article 65) provides that independent authorities are obliged to establish

internal audit units. In case the competent management body of an independent authority finds that it is impossible to establish an internal audit unit, it may: (i) establish an internal audit unit jointly with other public bodies; or (ii) award internal audit support to external providers; or (iii) be subject to the internal audit unit of the competent Ministry. If the establishment of an internal audit unit is not possible due to the specific nature of an independent authority's responsibilities, this should be justified by a decision of its competent management body, which should be notified to the Court of Auditors, the Ministry of Interior and the National Transparency Authority.

Audit committees

Decision ΓΑΔΔΤ 741 of the Minister of Finance and the Minister of Interior (entered into force with its publication on 30 December 2022, as provided by article 11), provides for the criteria and framework for the establishment of audit committees in independent authorities. This Decision specifies how such committees are set up, the qualifications and mandate of their members, as well as the competences and operational arrangements of the audit committees in independent authorities.

The issuance of a Joint Ministerial Decision to set the criteria for the cooperation of internal audit units with external experts.

Decision ΓΑΔΔΤ 358/9388 of the Minister of Finance and the Minister of Interior (entered into force with its publication on 17 June 2022, as provided by article 6), as amended by Decision ΓΑΔΔΤ 65/OIK.1682 of the Minister of Finance and the Minister of Interior (entered into force with its publication on 2 February 2023, as provided by article 2), provides for the criteria for the cooperation of internal audit units with external experts. Specifically, the Decision sets out the requirements for third parties to provide services concerning the support of internal audit units, their obligations, the reasons for excluding certain third parties, and conflict of interest provisions. The aforementioned provisions set the framework and the rules facilitating the cooperation between the internal audit units and external experts that will support the internal audit processes.

The National Transparency Authority in cooperation with the Ministry of Interior shall provide oversight and guidance to general government entities to put in place a coherent and functioning Internal Control system.

The report by the National Transparency Authority entitled "Oversight and guidance on the development of a coherent and functioning internal control system in general government entities" (December 2022) demonstrates the oversight and guidance provided by the National Transparency Authority to general government entities on their internal control system, with the cooperation of the Ministry of Interior. Such oversight and guidance concerned: (i) legislative and regulatory initiatives, notably participation in developing the new Law on internal controls in public administration and the relevant regulatory acts, including by providing views and suggestions on draft legislation; (ii) support in the implementation of the internal control system and the establishment of internal audit units through developing relevant guidance, policies and procedures, opinions and consultations, and methodologies and tools; (iii) development of a pilot programme of internal audit projects involving units from ministries and other public bodies; (iv) design and development of the network of internal auditors in public administration and organisation of their certification programme, as well as of related trainings, workshops and seminars; (v) implementation of a project for the assessment of the maturity of the internal control system for financial management in Ministries.

The National Transparency Authority shall facilitate a pilot self-assessment regarding the basic elements of the internal control system.

The report by the National Transparency Authority entitled “Internal control system maturity assessment - pilot implementation” (version 1.0, December 2022) concerns a pilot self-assessment on elements of the internal control system in public administration, which was developed and coordinated by the National Transparency Authority. That project assessed the maturity level of ministries’ internal control systems, with the aim of capturing the current situation, indicating good practices and weak points of the system, and identifying opportunities for improving the institutional framework and the procedures followed.

The Hellenic Court of Auditors has included in its annual work plan, audits for the assessment of internal control arrangements across general government entities.

The Hellenic Court of Auditors’ annual audit plan for year 2022 includes, among others, a part concerning audits on the effectiveness of the internal control system in public administration. Specifically, the following administration audits are mentioned: (i) audits on direct awards of public contracts or awards following a short negotiation procedure; (ii) audits on hiring external third parties; (iii) audits on financing towards non-governmental organisations and associations; (iv) audits on the integrity and effectiveness of fiscal controls.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 214	Related Measure: Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption – Enhance State-aid network (Measure ID: 16701)	
Name of the Milestone: Enhanced State-aid network		
Qualitative Indicator: Entry into force of the enhanced state-aid framework		Time: Q4 2022
Context:		
<p>The objective of the reform is to revise the Greek state aid legal framework and strengthen the capacity of the network of state aid units across Ministries, primarily through the upgrade of the Central State Aid IT System establishing a digital state aid cases library, an intranet communication platform and data analytics tools.</p> <p>Milestone 214 requires the entry into force of the amendments to the state aid legal framework for the operation of Central State Aid Network (CESANET), to strengthen the competencies of the Central State Aid Unit and the Decentralised State Aid Units.</p> <p>Milestone 214 is the only milestone of this reform.</p> <p>The reform has a final expected date for implementation in Q4 2024.</p> <p>Following the completion of milestone 214, in line with the description of the measure in the Council Implementing Decision, Greece additionally intends to: upgrade the Central State Aid IT System establishing digital state aid cases library, intranet communication platform and data analytics tools.</p>		

These are further steps of this reform that are not required by the milestones and targets in the Council Implementing Decision.

Evidence provided:

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

- i. Summary note;
- ii. Copy of Law 5000/2022, Chapter B, '*Institutional framework for the operation of the central state aid unit and the state aid network*' (Articles 22-35) (Official Journal, Series I, No 226 of 9 December 2022);
- iii. Copy of Joint Ministerial Decision No 189794 of 23 December 2022 of the Minister of Finance and the Minister of Justice, concerning the '*Operation of the central system for state aid under Law 5000/2022*' (Official Journal, No 6741 of 27 December 2022).

Analysis:

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

Entry into force of the amendments to the State aid legal framework for the operation of Central State Aid Network (CESANET), to strengthen the competencies of the Central State Aid Unit and the Decentralised State Aid Units.

The Council Implementing Decision required the entry into force of the *amendments* to the State aid legal framework. Greece adopted Law 5000/2022 which amended the existing State aid legal framework for the operation of the CESANET, by repealing pre-existing provisions and codifying all provisions on the institutional framework for the operation of state aid, previously included in various pieces of legislation (e.g. sections B.2-B.12 of paragraph B of Law 4152/2013 and Article 22 of Law 4002/2011 on the recovery of unlawful aid), into a single piece of legislation.

Milestone 214 is considered fulfilled by the entry into force on 9 December 2022 of Chapter B of Part C of Law 5000/2022 on the '*Institutional framework for the operation of the central state aid unit and the state aid network*' pursuant to Article 77 of such law, which foresees that the Law shall enter into force on the day of its publication in the Official Journal and by the entry into force on 27 December 2022 of Joint Ministerial Decision No 189794 on the '*Operation of the central information system for State aid*' pursuant to Article 14 of such JMD, which foresees that the Decision shall enter into force on the day of its publication in the Official Journal.

As per its title, Chapter B of Part C of Law 5000/2022 sets out the institutional framework for the operation of the Central State aid Unit within the Directorate-General for State Aid and Relief of the Secretariat-General for Economic Policy of the Ministry of Finance (hereinafter referred to as KEMKE) and of the Decentralized State aid Units within each Ministry (hereinafter referred to as AMKE). Article 23 of Law 5000/2022 sets out KEMKE's responsibilities and Article 27 foresees in particular that KEMKE is the responsible entity for the operation of the CESANET, in accordance with the provisions set out under Presidential Decree 142/2217 (Official Journal, Series I, No 192) while the Secretariat General for Information Systems of the Public Administration of the Ministry of Digital is designated as the responsible entity that technically supports CESANET's operation, in accordance with Articles 85 to 88 of Law 4727/2020 on Information Infrastructures. Article 24 defines the role of Decentralized State aid Units, while Article 25 defines the procedure for the

consultation of the CESANET. Article 26 defines the rules for the cooperation with the Centre of International and European Economic Law (CIEEL) and Article 27 contains provisions on the Central State Aid Information System (CISE). Article 28 introduces amendments to the legal framework for the operation of the CESANET in view of making the use of the CISE mandatory for bodies within the Greek public administration implementing actions entailing State aid financed by EU funds and the European Agricultural Fund for Rural Development (EAFRD). In addition, Article 29 foresees that the CISE mandatorily interoperates with the 'information system for the cumulation of aid of minor importance' in order to facilitate the online registration, processing and monitoring of state aid granted in Greece. Finally, Articles 30 and 31 amend the provisions related to the procedures for the recovery of unlawful and incompatible State aid in view of clarifying them and consolidating them into a single piece of legislation.

In line with Article 27 of Law 5000/2022, the Joint Ministerial Decision No 189794 of 23 December 2022 further specifies the provisions related to the '*Operation of the central information system for State aid*'. In particular Joint Ministerial Decision No 189794 (i) regulates the way in which the CISE operates, defines its requirements in terms of interoperability and interconnection with the entities which keep State aid data and clearly defines the responsibilities of various entities involved in the operation of the CISE, the State aid data to be registered, processed and monitored and provides for the obligation of operators maintaining information systems with State aid data to interconnect with the CISE.

Furthermore, in line with the description of the measure,

This reform shall revise the Greek state aid legal framework and strengthen the capacity of the network of state aid units across Ministries

The elements presented above also fulfil the requirement of the description of the measure in the Council Implementing Decision insofar they revise the Greek state aid legal framework and strengthen the capacity of the network of state aid units across Ministries (AMKE).

Commission Preliminary Assessment: Satisfactorily fulfilled

<p>Number: 215</p>	<p>Related Measure: 13 - 4.2. Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption – Enhancement of policy planning and coordination (Measure ID: 16981)</p>	
<p>Name of the Milestone: Policy planning and coordination – impact assessment</p>		
<p>Qualitative Indicator: Training programme launched with 100 civil servants selected to attend.</p>		<p>Time: Q4 2022</p>
<p>Context:</p> <p>The measure aims to strengthen the policy coordination, planning and policy development of the central administration. Specific actions that form part of this reform are (i) establishment of a monitoring mechanism to track progress of timely adoption of secondary legislation set out in primary legislation; (ii) establishment of an electronic platform to facilitate completion of the impact</p>		

assessment accompanying each draft law; and (iii) launch of a training programme for civil servants to improve the quality of the impact assessments prepared.

Milestone 215 concerns the launch of a training programme and associated accreditation procedure for at least 100 civil servants enrolled, including civil servants selected for a new job classification entitled “executive branches” (established by Law 4622/2019, Article 104). The training of civil servants is expected to improve the quality of the impact assessments prepared and facilitate the use of an electronic platform that has been established.

Milestone 215 is the only milestone or target of this reform.

In line with the description of the measure in the Council Implementing Decision, Greece has confirmed that the monitoring mechanism to track progress of timely adoption of secondary legislation is in place and being utilised by the General Secretariat of Coordination. This is a further step of this reform that is not linked to the milestones and targets in the Council Implementing Decision.

Evidence provided:

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

- i. Summary document duly justifying how the milestone was satisfactorily fulfilled. The summary document included:
 - a. Training and certification actions completed, including confirmation on the number of persons enrolled, including civil servants selected for the “executive branches; and
 - b. Type of training and certification provided with detail of its content and learning format used.

The authorities also provided:

- i. Legal framework setting out details on the establishment of the new job classification, “executive branches”, including that the selected candidates are existing civil servants; and
- ii. Sampling information: 60 confirmation requests that the civil servant is enrolled to one (out of two) training programmes on impact assessment

Analysis:

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

A training programme and associated accreditation procedure shall be launched with at least 100 civil servants enrolled, including civil servants selected for the “executive branches” (Law 4622/2019, Article 104) aiming to improve the quality of the impact assessments prepared and facilitate the use of the electronic platform

To carry out the training relating to impact assessment, the Secretariat General for Legal and Parliamentary Affairs (part of the Presidency of the Government), in coordination with the Ministry of Interior, assigned this role to the National Centre for Public Administration and Local Government (EKDDA), which provides for capacity building through up-skilling and re-skilling of civil servants in the Greek public administration.

Two separate training programmes were established by EKDDA:

- “Better Regulation in practice: drafting regulatory documents and accompanying reports” (programme approved in May 2022): the training consists of four training sessions across four days (in total 28 hours), including a one-hour end-of-course exam, which comprises both close and open-ended questions. In particular, the training programme includes the following three sessions relating to impact assessment: (i) better regulation and the use of regulatory impact analysis in taking regulatory initiative; (ii) ex ante regulatory impact analysis and ex post regulatory impact assessment; and (iii) simulation workshop on producing a regulatory impact analysis using the electronic platform.
- “Public service training for the executive branch” (programme approved in June 2022): the training programme comprises two preliminary (2) and three (3) supplementary courses. The preliminary courses are common for the three categories of the “executive branch” (i.e. public policy analysts, legal drafters and digital policy analysts, while the supplementary courses are custom-designed for each specific category. For the legal drafters category the training programme covers 203 hours of training, out of which 36 hours is assigned to regulatory impact analysis and assessment, in addition to 4 hours of training on the electronic platform. It is noted that “the executive branch” of the civil service was introduced by the Executive State Law in 2019 (Law 4622/2019), which aims to create and promote within the Greek public administration an agile corps of highly skilled and highly competent civil servants, specially trained as public policy analysts, legislation drafters and digital policy analysts.

The enrolment into these two training programmes were as follows:

- “Better Regulation in practice: drafting regulatory documents and accompanying reports”: five training courses were held during 2022 with a total number of 111 civil servants participating; and
- “Public service training for the executive branch”: the admissions test, which was organised by EKDDA, took place on 12 December 2022 and the total number of civil servants admitted to the specialist course for ‘legal drafters’ was 41.

The evidence provided for a sample of 60 units confirmed the enrolment of the civil servant in the specific training programme.

The sample was checked by the Commission on 13 April 2023 and confirmed the validity of the information provided by the authorities. Specifically, for each of the registration documents within the sample, the unique identification number identifying each civil servants were cross-referenced to the annexed report provided by the Ministry, containing the 152 registration documents.

Launch of the electronic platform for impact assessment

The Council Implementing Decision refers to the launch of the electronic platform. A platform has been established that is designed as a government to government (G2G) service for document and process management and is custom-designed according to the specifications of the regulatory impact analysis template laid down by the Secretariat General for Legal and Parliamentary Affairs (part of the Presidency of the Government).

The Secretariat General for Legal and Parliamentary Affairs has been granted access right of a demo mode of the platform since March 2022 by the developer (GRNET S.A. - National Infrastructures for Research and Technology). Since June 2022, the access rights were extended to also cover the

participants taking part in the two training programmes related to impact assessment, as referred to above. It is noted that through the access rights given to the civil servants that took part in the training programme, GRNET S.A. had the opportunity to collect and evaluate feedback to improve user experience design, functionality and usability of the platform. Since April 2023, the platform has completed the development phase and all functionalities are operable and accessible. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 223	Related Measure: Improve the efficiency of the justice system - Accelerating the administration of justice (Measure ID: 16575)	
Name of the Milestone: Technical support – Judicial Performance Tool		
Qualitative Indicator: Award of tender for technical support		Time: Q3 2022
<p>Context:</p> <p>Milestone 223 is part of measure 16575, whose objective is to accelerate the administration of justice, enhance its efficiency and effectiveness so as to contribute to the economic and institutional transformation of the country. To this end, said measure will comprise several elements, ranging from a revision of the judicial map across Greece (covering all branches of the judiciary), to the creation of a judicial police, the introduction of an array of procedural and training measures and the introduction of a judicial performance tool for the provision of financial incentives to judicial clerks.</p> <p>Milestone 223 concerns the last of the above-listed elements, namely the introduction of a judicial performance tool, in the form of a temporary scheme for the provision of financial incentives to judicial clerks, to be based on objectively measurable individual performance indices and in full consistency with the unified wage grid (Law 4354/2015), aiming at accelerating the performance of courthouse-related tasks and duties and eliminating court backlogs.</p> <p>Milestone 223 is the initial step in the implementation of the measure and consists of the award of the contract for the provision of technical support to be used by the Greek authorities in the process of drafting the relevant primary and secondary legislation. The next and final step for its fulfillment is Milestone 230, consisting of the adoption and entry into force of the primary and secondary legislation relevant to the judicial performance tool due by 30 June 2023.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided by the Greek authorities:</p> <ol style="list-style-type: none"> i. A Summary Note, dated 12 May 2023, duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. ii. The Reimbursable Advisory Services Agreement “Support for Reform of the Judicial Map of the Civil and Criminal Courts and for the Development of a Performance-based Human Resources Management Framework”, between the Hellenic Republic and the International Bank for Reconstruction and Development, entered into on 31 March 2022. iii. The Amendment No. 1 to the Reimbursable Advisory Services Agreement “Support for Reform of the Judicial Map of the Civil and Criminal Courts and for the Development of a 		

Performance-based Human Resources Management Framework”, between the Hellenic Republic and the International Bank for Reconstruction and Development, entered into on 12 August 2022.

- iv. The Decision No. 380/2022 of the Greek Court of Auditors in full plenary formation, issued on 9 February 2022.
- v. The Act No. 112/2022 of the Greek Court of Auditors (7th Chamber), issued on 10 March 2022.

The authorities also provided:

- vi. Law 4940/2022, published in the Official Journal, Section A, issue number 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”, which is relevant to the completion of upcoming Milestone 230 and will be assessed in that context.

Analysis:

The justification and substantiating evidence provided by the Greek authorities cover all constitutive elements of the milestone as set out in the Council Implementing Decision.

This is demonstrated in the sections below.

Award of a tender for technical support for the development of a Judicial Performance Tool.

This requirement was met by the signing, on 31 March 2022, of the Reimbursable Advisory Services Agreement “Support for Reform of the Judicial Map of the Civil and Criminal Courts and for the Development of a Performance-based Human Resources Management Framework” (“the contract”), between the Hellenic Republic and the International Bank for Reconstruction and Development for the provision, among other deliverables, of technical support for the development of a Judicial Performance Tool.

The Judicial Performance Tool shall be based on strategic goals, introducing objective key performance indicators (time for completing a duty, individual performance in terms of time, communication, motivation etc.) by department and/or category of clerks and providing accurate and objective data on the allocation of bonuses. This requirement is met by the deliverables described under the heading “Component 2” (pages 9 and 10 of the annex to the contract, whose provisions are binding on the International Bank for Reconstruction and Development). More specifically, these deliverables include:

- The preparation of a baseline and benchmarking report (“the Report”) on human resource performance and compensation (“Activity 2.1”), based on an assessment of (a) the alignment of the tasks generally performed by judicial clerks with the applicable framework, including courts’ rules, procedures, and job descriptions and (b) critical human resource management functions, including relevant existing performance management practices for judicial clerks. The Report shall contain (a) an analysis of relevant existing human resource management functions for judicial clerks, including current performance management practices and (b) an analysis using relevant international and national benchmarks.
- The preparation of an options note (“the Note”), based on the findings of the Report (“Activity 2.2”), which shall (a) summarise the latter’s analysis, (b) identify reform options for the introduction of the Judicial Performance Tool and (c) provide recommendations for its application, based on key performance indicators (such as time required for completing a task; individual performance in terms of time, communication and motivation, etc.), aiming to facilitate the definition of the tasks of judicial clerks, their evaluation and the allocation of bonuses or other incentives by department and/or category of clerks.

- A technical note on proposals for the development of software to support the operation of the judicial performance tool (“Activity 2.3”).

Payment of bonuses under the Judicial Performance Tool shall be made in the first quarter after the end of the relevant year, on the basis of that year’s performance. This requirement is met by the explicit stipulation of the contract (page 10, component 2, activity 2.2) that bonuses shall be payable in the first quarter after the end of the relevant year, on the basis of that year’s performance

The Judicial Performance Tool shall be temporary. Article 26(2) of Law 4940/2022 expressly stipulates that the bonuses in question shall be paid over the period from 1 January 2023 to 31 December 2025.

The Judicial Performance Tool shall be in full consistency with the unified wage grid (law 4354/2015), without setting any exemption for the elimination of court backlogs.

This requirement is met by the explicit stipulation of the contract (page 10, Component 2, Activity 2.2) that the tool shall be in full consistency with the unified wage grid (Law 4354/2015) without setting any exemption for the elimination of court backlogs.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 225	Related Measure: Improve the efficiency of the justice system – Accelerating the administration of justice (Measure ID: 16575)	
Name of the Milestone: Judicial Police – Secondary legislation		
Qualitative Indicator: Entry into force of legislation		Time: Q3 2022
<p>Context:</p> <p>Milestone 225 is part of measure 16575, whose objective is to accelerate the administration of justice, enhance its efficiency and effectiveness so as to contribute to the economic and institutional transformation of the country. To this end, said measure will comprise several elements, ranging from a revision of the judicial map across Greece (covering all branches of the judiciary), to the creation of a judicial police, the introduction of an array of procedural and training measures and the introduction of a judicial performance tool for the provision of financial incentives to judicial clerks.</p> <p>Milestone 225 concerns the second of the above-listed elements, namely the creation of a judicial police and requires the entry into force of all secondary legislation necessary for the full implementation of the law on the Judicial Police in order for it to assist the work of the judicial and prosecutorial Authorities with a number of actions, detailed and discussed in the analysis section below.</p> <p>Milestone 225 is the first step of the implementation of the creation of a judicial police and will be followed by milestone 234, related to the full operationalisation and functionality of the judicial police in all its competences, both at central administration level and at regional level within the courts. The reform has a final expected date for implementation by 31 December 2023.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. A summary note, dated 11 May 2023, duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. 		

- ii. Presidential Decree 6/2023 (Official Journal section A, issue 13/20.01.2023) establishing the Directorate of Judicial Police, four regional services of the Judicial Police, organic positions of the Judicial Police and defining the competencies of its regional services.
- iii. Presidential Decree 31/2023 (Official Journal section A, issue 63/15.03.2023) providing for the uniforms and individual equipment of the police sector personnel of the judicial police.
- iv. Joint Ministerial Decision 19943oik/2023 (Official Journal section B, issue 2556/19.04.2023), as combined with an entry on the correction of clerical mistakes published in Official Journal B 2997/08.05.2023), regarding the introductory training of the Judicial Police personnel.

The authorities also provided:

- v. Law 4963/2022 (Official Journal section A, issue 149/30.07.2022) on the formation of a judicial police and other urgent provisions of the Ministry of Justice, which constitutes the primary legislation for the creation of the judicial police and contains, in its article 59, the enabling provisions for the adoption of the above-listed secondary legislation.

Analysis:

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

This is demonstrated in the sections below.

Entry into force of all secondary legislation (in the form of Presidential decrees or ministerial decisions, as appropriate) necessary for the full implementation of the law on the Judicial Police to assist the work of the Judicial and Prosecutorial Authorities with:

- the provision of scientific and technical assistance to judges and prosecutors in matters requiring technical or professional expertise;
- the conduct of preliminary examinations and investigations;
- the execution of warrants;
- the provision of assistance in submitting or responding to requests for judicial assistance;
- the service of documents and procedural acts;
- the enforcing of judgments;
- the guarding of and maintenance of order in courthouses;
- other procedural acts entrusted to it by the competent courts and public prosecutors.

Following the adoption of the necessary primary legislation, namely law 4963/2022 (listed in the evidence section, under numeral v), which entered into force upon publication in the Official Journal (by virtue of its article 62), on 30 July 2022, and in compliance with its delegating provisions, as set out in its article 59, Greece adopted the secondary legislation that is necessary for the full implementation of the law on the Judicial Police to assist the work of the Judicial and Prosecutorial Authorities and is reflected in all objectives listed in article 4 of the law, defining the competences of the regional services of the judicial police respectively and addressing logistics and training matters. More specifically:

Regarding the definition of the competences of the judicial police, Presidential Decree 6/2023 (listed in the evidence section, under numeral ii) was adopted and entered into force, as per its article 10, upon publication in the Official Journal, on 20 January 2023, establishing the Directorate of Judicial Police and four regional services, defining the organic positions of both the civil branch and the police branch of the Judicial Police and defining the competencies of its regional services as follows, in the order listed in the CID description:

- The provision of scientific and technical assistance to judges and prosecutors in matters requiring technical or professional expertise is entrusted to the regional civil sections of the judicial police (article 6b);

- The conduct of preliminary examinations and investigations is entrusted to the regional civil sections of the judicial police (article 6a);
- The execution of warrants is entrusted to the regional police sections of the judicial police (article 7b), in the context of the execution of all court decisions, as expressly and specifically confirmed by the authorities in the summary note (page 5, third to last paragraph), which states that “the competence of the judicial police concerning the ‘execution of warrants’, although not expressly mentioned, falls under the general category of competence relating to the ‘enforcement of judgments’ ”.
- The provision of assistance in submitting or responding to requests for judicial assistance is entrusted to the regional civil sections of the judicial police (article 6c);
- The service of documents and procedural acts is entrusted to the regional police sections of the judicial police (article 7a);
- The enforcing of court decisions is entrusted to the regional police sections of the judicial police (article 7b);
- The guarding of and maintenance of order in courthouses is entrusted to the regional police sections of the judicial police (article 7c).

As for the potential addition of new competencies, regarding procedural acts that may be entrusted to the judicial police by the competent courts and public prosecutors, it can be effected at any time, as expressly confirmed in the summary note, by an amendment to the above Presidential Decree, given that the enabling provision of article 4(2) of Law 4963/2022 specifies that the listing of the relevant competencies is indicative.

In addition, the authorities adopted the following legislation addressing the setting up and operation of the judicial police (not listed in the CID or the Operational Arrangements):

- Regarding the regulation of logistic matters, relevant to the performance of their duty by the staff of the justice police, Presidential Decree 31/2023 (listed in the evidence section, under numeral iii) was adopted and entered into force upon publication in the Official Journal, on 15 March 2023, determining the uniforms, emblems, insignia and equipment to be used by its personnel.
- Regarding the provision of introductory training of the Judicial Police personnel on subject matters relevant to the performance of their above-listed duties, Joint Ministerial Decision 19943/2023 (listed in the evidence section, under numeral iv) was adopted and entered into force upon publication in the Official Journal, on 19 April 2023, specifying the location of the training for both branches (civil and police) of the judicial police (article 1), purpose (article 2), duration (article 3), syllabus (article 4), attendance and assessment (article 5) graduation modalities (articles 6-8), defining the training staff (articles 9-10) and providing for the funding of the resulting expenses (article 11).

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 226	Related Measure: Improve the efficiency of the justice system – Accelerating the administration of justice (Measure ID: 16575)	
Name of the Milestone: Judicial map - primary legislation – administrative		
Qualitative Indicator: Entry into force of legislation		Time: Q4 2022
Context:		

Milestone 226 is part of measure 16575, whose objective is to accelerate the administration of justice and enhance its efficiency and effectiveness so as to contribute to the economic and institutional transformation of the country. To this end, said measure will comprise several elements, ranging from a revision of the judicial map across Greece (covering all branches of the judiciary), to the creation of a judicial police, the introduction of an array of procedural and training measures and the introduction of a judicial performance tool for the provision of financial incentives to judicial clerks.

Milestone 226 concerns part of the first of the above-listed elements, namely the revision of the administrative branch of the judicial map and requires the entry into force of the relevant primary legislation.

Milestone 226 is the first step of the implementation of the reform and will be followed by milestone 236, related to the 70% of affected entities (courts) and milestone 238, related to the operationalisation and functionality of all reformed entities. The reform has a final expected date for implementation by 31 December 2025.

Evidence provided:

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

- i. A summary note, dated 2 May 2023, duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
- ii. Law 5028/2023 (Official Journal Section A issue 54/09.03.2023) on the reorganisation of the judicial districts of administrative courts, the organization of telematic hearings, the conversion of transitional seats, the establishment of telematic offices and other urgent provisions of the Ministry of Justice and sundry provisions.

The authorities also provided:

- iii. A map depicting the 20 secondary seats (first instance and appellate) of ordinary administrative courts, which will be converted into telematic court offices.
- iv. A map depicting the territorial jurisdiction of the Corfu and Ioannina administrative courts of first instance under presidential decree 404/1978.

Analysis:

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

This is demonstrated in the sections below.

Entry into force of primary legislation for the revision of the judicial map for administrative justice.

Regarding the adoption and entry into force of the relevant legislation, the Greek authorities provided a copy of law 5028/2023 with the appropriate references of publication in the Official Journal (as indicated above in the Evidence section, under numeral iii), whose chapters three (articles 13 and 14) and four (articles 16-18, in conjunction with the Appendix to the law, also published in the same issue of the Official Journal) contain the provisions relevant to the revision of the administrative judicial map; moreover, article 46(1) of the law stipulates its entry into force on the day of its publication in the Official Journal, which is on 9 March 2023, with the exception of articles 13(1) and 14, respectively on (i) the redefinition of the territorial jurisdiction of administrative courts and (ii) the redistribution, based on territorial criteria, of specific categories of cases among them, which entered into force on 30 June 2023, as per article 46(20) of the law.

Furthermore, in line with the description of the measure, the stipulations of the relevant chapters of law 5028/2023, as described in the summary note provided by the authorities and analysed in greater detail in the impact assessment report accompanying the law, duly lay out the necessary measures for the fulfilment of milestone 226, namely the revision of the administrative map. More specifically:

- Regarding the territory of Greece in its entirety, article 13(1) of the law redefined the geographical boundaries of the territorial jurisdiction (districts) of the administrative courts (30 first-instance and 9 appellate ones), as well as their respective seats, in line with the recent definition of the geographical boundaries of regional self-government, as introduced in 2011 with the “Kallikratis” programme. It should be noted that, since the implementation of the latter, the merging of regional self-government entities or the redrawing of their boundaries did not affect at that time the territorial jurisdiction of administrative courts, resulting in jurisdiction disputes and inconveniencing parties to administrative litigation. The new rearrangement of territorial jurisdiction under said provision of law 5028/2023 is fully consistent and harmonized with the current administrative division of the regional self-government entities of Greece, while also taking into account the reduction of secondary seats of administrative courts from 40 to 20. The secondary seats are the so-called “commuting court seats”, serving remote areas of the country. Under this judicial institution, the judges of the main seat of a court commute to other cities of the administrative district of the court periodically, in order to adjudicate cases filed in those areas. Commuting court seats essentially function as secondary seats in relation to the “main seat” of the court. They have their own staff and building facilities, but the judges who commute to it serve in the main seat of the court and belong organically only to it.
- Regarding changes in the territorial jurisdiction of individual courts:
 - By virtue of article 13(1), section A.2 of the law, the territorial jurisdiction of the Administrative Court of First Instance of Piraeus has been extended over cases arising from acts or omissions of administrative authorities based in the municipalities of Elefsina, Mandra-Idyllia, Megareon, Fylis, Aspropyrgos, Chaidari and Korydallos. This arrangement aims at relieving the oversized first instance administrative court of Athens, based on the criterion of accessibility and the creation of a single coastal front, extending from the municipality of Megara, in the south-western part of Attica, to the municipality of Vari-Voulas-Vouliagmeni, in its south-eastern part, and following, as homogeneously as possible, the existing administrative territorial division of the Attica region. The reassignment of the territorial jurisdiction in question was based on detailed statistical data on such portion of the workload of the administrative first instance court of Athens as originated from above reassigned municipalities over a decade, as well as on data regarding the overall backlog of both the Athens and Piraeus first-instance administrative courts.
 - By virtue of article 13(1), section A.8 of the law, the territorial jurisdiction of the administrative first instance court of Ioannina has also been extended over cases arising from acts or omissions of administrative authorities based in the Regional Unit of Thesprotia, in the north-western part of Greece. This arrangement was introduced on the basis of the principle of proximity, for the convenience of the parties to administrative litigation, taking into account the new road network in the area as well as the statistics regarding the case burden of the hitherto competent first instance administrative court of Corfu.
- Moreover, specific categories of cases have been decentralized, based on the nature of the dispute, and redistributed among the administrative courts of Greece pursuant to the provisions of article 14 of the law. The redistribution in question has been effected in interest of efficiency and of maximizing convenience to the parties to administrative litigation. Indeed, the parties to the relevant disputed will be submitted to the jurisdiction of the administrative courts, based on

the principle of proximity of their residence to the court, rather than on the basis of the location of the seat of the state authority or entity, which is usually in Athens or other major cities. The cases in question are the following:

- Cases related to social security disputes, which concern large groups of citizens, often belonging to vulnerable groups;
- Remuneration disputes between state entities, regional government entities and public sector entities and their respective personnel;
- Tax disputes arising from the conduct of tax audits conducted by authorities based in Athens whose competence extends beyond the Attica region;
- Disputes related to social security audits and fines.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 227	Related Measure: Improve the efficiency of the justice system – New Judicial Buildings (Measure ID: 16292)	
Name of the Milestone: List Adjustment – Launch of tenders		
Qualitative Indicator: List of renovation projects in line with the relevant law on the revision of the judicial map, as per milestone 14 4.3 / Q4 2022; launch of tenders		Time: Q4 2022
<p>Context:</p> <p>Milestone 227 is part of investment 16292, which aims at the construction and renovation of buildings that are part of the judicial system, in close coordination with the revision of the judicial map, so as to maximize judicial efficiency and avoid unnecessary effort and expenses. Regarding new constructions, the buildings shall all comply with a Primary Energy Demand at least 20% lower than the nearly zero-energy building (NZEB) requirement, as per national directives. It is expected that this investment will not cause significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852</p> <p>Milestone 227 consists of two points: i) the adjustment of the list of construction or renovation projects in alignment with the revision of the administrative judicial map as adopted in the law; ii) the launch of the tenders regarding the construction of administrative courts; the terms of the tenders being required to specify that newly constructed buildings shall achieve a Primary Energy Demand (PED) that is at least 20% lower than the NZEB requirement (nearly zero-energy building, national directives).</p> <p>Milestone 227 is the second milestone of the investment and follows the completion of milestone 222, which consisted in the compilation of a list of courts not affected by the revision of the judicial map and eligible for either relocation in new premises or renovation of their current ones. It will be followed by milestone 231, consisting of the award of contracts for construction projects not affected by the revision of the judicial map and milestone 237, consisting of (i) the completion of all construction and renovation projects in line with the needs of the revised judicial map and (ii) the completion and full operationalisation of the judicial buildings’ e-identity platform. The investment has a final expected date for implementation by 31 December 2025.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. A summary note, dated 10 May 2023, duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. 		

- ii. A report by the Ministry of Justice, dated 24 March 2023, under protocol number 1772, providing a list of construction and renovation projects regarding judicial buildings, following the entry into force of the primary legislation for the revision of administrative judicial map and singling out the projects relevant to administrative courts.
- iii. Law 5028/2023 (Official Journal Section A issue 54/09.03.2023) on the reorganisation of the judicial districts of regular administrative courts, the decentralisation of their competencies, the organization of telematic hearings, the conversion of transitional seats, the establishment of telematic offices, other urgent provisions of the Ministry of Justice and sundry provisions.
- iv. A copy of the publication of the call for proposals for the upgrading (renovation) of the premises of the Administrative Courts of Athens, under Internet Upload Registry Number 23PROC012473551 2023-04-10, launched on 10 April 2023.
- v. A copy of the publication of the call for proposals for the upgrading (renovation) of the Building Complex of the Council of State, under Internet Upload Registry Number 23PROC012601688 2023-05-04, launched on 4 May 2023.
- vi. A copy of the publication of the call for proposals for the purchase of a real estate property located within the boundaries of the municipality of Piraeus, for the housing of the courts and judicial services of Piraeus, under reference ADA 6ΦΚ446ΨΧΥΙ-ΞΙΣ, launched on 21 July 2022.
- vii. An extract of the special conditions of the contract for the renovation of the premises of the Administrative Courts of Athens (above under iv), regarding the technical specifications ensuring compliance with DNSH specificities (article 4, section 4.1.6).
- viii. An extract of the special conditions of the contract for the renovation of the premises of the Building Complex of the Council of State (above under v), regarding the technical specifications ensuring compliance with DNSH specificities (article 4, section 4.1.6).

The authorities also provided:

- i. An undated and unsigned “Report” repeating the list of construction and renovation projects regarding administrative judicial buildings contained in the report of 24 March 2023 of the Ministry of Justice (above under ii) and providing the publication details of the calls for proposals for the renovation or construction works referred to above under iv, v and vi.

Analysis:

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

This is demonstrated in the sections below.

Milestone 227 requires:

(i) the adjustment of the list of projects in alignment with the revision of the (administrative) judicial map as adopted in the law.

Regarding the submission of the adjusted list of projects, the report of the Ministry of Justice, (referenced in the evidence section above, under numeral i), confirms that the courthouses included in the 14 September 2021 initial list of projects (as submitted in the context of Milestone 222), have not been affected by the revision of the administrative map. In consequence, the report reproduces unaltered the list of projects in line with the relevant law on the revision of the judicial map as per milestone 226, of which the ones relevant to point (ii) of the milestone under review are the following:

- The construction of the Piraeus judicial building, which will house administrative courts as well as the civil and criminal ones (number 1 in the report),
- The renovation of the Council of State building (number 6 in the report),
- The renovation of the Athens administrative courts building (number 7 in the report).

The Athens and Piraeus courts remain operational in the context of the revised map, as per the relevant provisions of article 13 of law 5028/2023, namely its sections 1.A.2 and 1.A.22, respectively regarding the Athens and Piraeus first instance administrative courts and sections 1.B.1 and 1.B.7, respectively regarding the Athens and Piraeus appellate administrative courts. Although not mentioned by above provisions, the Council of State is by definition not affected by the administrative judicial map revision (which only applies to “regular courts”, i.e. first-instance and appellate ones), by reason of its being the supreme administrative court.

(ii) The launch of the tenders regarding administrative courts

Regarding the launch of tenders and the requirement for the submission of copies of the relevant calls for tenders, the Greek authorities provided copies all three calls for tenders, (as identified in the Evidence section above, under numerals iv, v and vi of above section on submitted evidence, showing that the relevant competitions were open to applications. More specifically:

- i. The call for tenders for the upgrading (renovation) of the premises of the Administrative Courts of Athens, is expressly described (in its heading) as an open procedure and according to its article 7, “Applicable Legislation”, shall be conducted in accordance with the Greek and EU legislation on public procurement and allows, as per its article 21(1), for the participation of all physical or legal persons or entities or unions thereof, which are active in the sector of construction and electromechanical projects and are established in a member state of the EU, the European Economic Area or third countries, which have either signed and ratified the Government Procurement Agreement or have concluded bilateral or multilateral agreements with the EU regarding procedures for the commissioning of public contracts.
- ii. Similarly, the call for tenders for the upgrading (renovation) of the Building Complex of the Council of State is expressly described (in its heading) as an open procedure and is, and according to its article 7, “Applicable Legislation”, shall be conducted in accordance with the Greek and EU legislation on public procurement and allows, as per its article 21(1), for the participation of all physical or legal persons or entities or unions thereof, which are active in the sector of construction and electromechanical projects and are established in a member state of the EU, the European Economic Area or third countries, which have either signed and ratified the Government Procurement Agreement or have concluded bilateral or multilateral agreements with the EU regarding procedures for the commissioning of public contracts.
- iii. Finally, the call for tenders for the construction of the premises of the courts and judicial services of Piraeus, is also expressly described as an open procedure (in its heading).

Furthermore, the report mentioned in the evidence section above, under numeral ix, submitted by the Greek authorities alongside the report of the Ministry of Justice, provides the publication details of the launch of the tenders for the renovation or construction works regarding all three of above-mentioned administrative courts.

(iii) That the terms of tender shall set out that newly constructed buildings shall achieve a Primary Energy Demand (PED) that is at least 20% lower than the NZEB requirement (nearly zero-energy building, national directives).

The terms of tender set out that newly constructed buildings shall achieve a Primary Energy Demand (PED) that is at least 20% lower than the NZEB requirement (nearly zero-energy building, national directives). As this requirement concerns newly constructed buildings, the relevant call for tenders is the call for the construction of the premises of the courts and judicial services of Piraeus (referred to in the evidence section above, under numeral vi), which foresees the construction of a new building. Article II.4.iv of the call contains the selection criteria that ensure compliance with DNSH

specificities, namely that the newly constructed building shall achieve a Primary Energy Demand (PED) that is at least 20% lower than the NZEB requirement (nearly zero-energy building, national directives).

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 278	Related Measure: Modernise and improve resilience of key economic sectors – Labour Reform in the Cultural Sector (Measure ID: 16715)	
Name of the Milestone: Legislation for Labour Reform in the Cultural sector		
Qualitative Indicator: Entry into force of legislation and secondary legislation and set up of a system to credibly evaluate status of the “creative or cultural professional”		Time: Q3 2022
<p>Context:</p> <p>The measure aims to introduce labour and social security legislation for the cultural and creative sector with a view to increasing the share of declared work in the sector and supporting the industry’s professionals and protecting their intellectual property rights. The objective of this reform is to increase the resilience of the cultural and creative sector. The implementation of the reform shall be completed by 30 September 2022.</p> <p>Milestone 178 requires the entry into force of legislation for Labour Reform in the Cultural sector, including definition of a status of “creative or cultural professionals” and proportionate tax and social security incentives.</p> <p>Milestone 278 is the only milestone or target of this reform.</p>		
<p>Evidence provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ol style="list-style-type: none"> i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. ii. Copy of the publication in the Official Journal for primary legislation (Law 4821/2021 on “Modernization of the Greek Land Registry, new digital services and strengthening of digital governance and other provisions”, OJ A 134/31.04.2021). iii. Copy of the publication in the Official Journal for primary legislation (Law 4949/2022 on “Incorporation of par. 5 of article 1 of Council Directive (EU) 2017/952 of 29 May 2017 amending Directive (EU) 2016/1164 regarding discrepancies in the treatment of hybrid vehicles with third countries (L 144) and other urgent issues”, OJ A 126/30.06.2022). iv. Copy of the publication in the Official Journal for primary legislation (Law 5039/2023 on “Measures to support relatives of the victims and those affected by the February 28, 2023 Tempe train accident, pension provision, arrangements to enhance transportation safety, provisions to enhance development, interventions to modernize tourism legislation and other emergency provisions”, Articles 107, 108-111, OJ A 83/03.04.2023). v. Copy of the publication in the Official Journal for secondary legislation (Joint Ministerial Decision of the Ministers of Finance and Culture and Sports No 214630/2023, OJ B 2940/03.05.2023). vi. Copy of the publication in the Official Journal for secondary legislation (Joint Ministerial 		

- Decision of the Ministers of Finance, Development and Investments and Culture and Sports No 223506, OJ B 3078/09.05.2023).
- vii. Copy of the publication in the Official Journal for secondary legislation (Joint Ministerial Decision of the Ministers of Finance, Labour and Social Affairs and Culture and Sports No 210053, OJ B 2905/02.05.2023).
 - viii. Copy of the publication in the Official Journal for secondary legislation (Joint Ministerial Decision of the Ministers of Digital Governance and Culture and Sports No 4419, OJ B 4345 /20.09.2021).
 - ix. Economic assessment by the Ministry of Culture and Sports of the labour market incentives provided by the above legislation.

Analysis:

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

The entry into force of legislation introducing proportionate tax and social security incentives is met by the adoption of the following primary and secondary legislation:

- **Law 4949/2022 (Official Journal 126 A/30.6.2022) that entered into force on 30 June 2022 according to Article 82.** Article 58 of the law notably provides for the following tax incentives a) a suspension of the self-employment tax for fiscal years 2022, 2023 and 2024 (imposed on all self-employed professionals under Law 3986/2011 and amounting to EUR 650 per year). The beneficiaries of such incentive are self-employed professionals in the Creative and Cultural sector (CCS) who stopped business between 1 January 2010 until the date of entry into force of the law (30 June 2022) and have restarted activity until 30 June 2023; and b) a decrease of the self-employment tax applied to all professionals in the sector for fiscal years 2022, 2023 and 2024 (EUR 400 per fiscal year instead of EUR 650). Moreover, Article 59 of the same law provides for a subsidy equal to 30% of the yearly turnover of fiscal years 2022, 2023 and 2024 (not exceeding EUR 5 000 in total) for the first 3 100 beneficiaries eligible for the self-employment tax suspension. The amount of the subsidy is remitted to escrow accounts held by the beneficiaries and is gradually released on the basis of the beneficiaries' turnover recorded during the relevant fiscal years. The subsidy is an additional incentive to the one provided to professionals restarting their business activities.
- **Joint Ministerial Decision of the Minister of Finance and the Minister Culture and Sports No 214630/2023 (Official Journal B 2940/03.05.2023) implementing Article 58 of the above Law that entered into force on the date of its publication in the Official Journal (3 May 2023) as there is no Article specifying the entry into force.** The Decision specifies the classes of economic activities to which professionals in the Creative and Cultural sector (CCS) fall under as per the applicable business activities classification and regulates various self-employment tax suspension and address implementation issues.
- **Joint Ministerial Decision of the Ministers of Finance, Development and Investments and Culture and Sports No 223506 (Official Journal B 3078/09.05.2023) implementing article 59 of the above Law that entered into force on the date of its publication in the Official Journal (9 May 2023) as there is no Article specifying the entry into force.** The Decision sets out various matters pertaining to the implementation of the subsidy adopted under Article 59 of Law 4949/2022.
- **Law 5039/2023 (Official Journal 83 A/03.04.2023) that entered into force on 3 April 2023.** Article 111 of the Law introduces an obligation of the employers for fair remuneration and payment of social security contributions concerning rehearsals of theatre, dance and music

productions. This regularizes the payment and social security conditions for rehearsals with those of other workers.

Economic assessment of the tax and/or social security incentives that took into consideration reliable statistics, and data provided by the Independent Public Revenue Authority (IAPR) came to the conclusion that the tax and social security incentives are proportionate.

The definition of a status of “creative or cultural professionals” and the setting up of a system to credibly evaluate status of the “creative or cultural professional” is met by the entry into force of the following primary and secondary legislation:

- **Law 5039/2023, (Official Journal A 83/3-4-2023)** that entered into force on 3 April 2023. Article 107 notably introduces a comprehensive definition of the Creative and Cultural sector to include any financial activity connected to literature, visual and audiovisual arts music, theatre dance and craft. Article 107 further introduces a definition of supporting cultural and creative activities. Accordingly, employees and professionals are divided into employees and professionals active in cultural and creative activities in the strict sense of the term and employees and professionals active in supporting such activities. Articles 108-110 provide for the establishment of a register where all above professionals in the cultural and creative sector and employees (including those active in supporting activities) may subscribe. Articles 107 and 108-110 attempt to map in a clear and comprehensive manner workers and professionals in the cultural and creative sector, thus allowing the planning, adoption, implementation and monitoring of more efficient and fair policies, pertaining to the establishment of new rights, benefits and support measures, as well as enhancing the protection of employment, professional and social security rights of workers and professionals. At the same time, all workers and professionals are able to receive real time, reliable practical information relating to rights, benefits and incentives available to them from time to time. Article 111 stipulates that the participation of actors, dancers and technical personnel employed in theatre, dance and music productions in rehearsals, qualifies as employment, subject to an individual agreement. This provision effectively suppresses undeclared work. Moreover, it fully clarifies from a legal, tax and social security standpoint the relevant rights and obligations of both employers and employees active in theatre, dance and music productions.
- **Joint Ministerial Decision of the Ministers of Finance, Labour and Social Affairs and Culture and Sports No 210053 (Official Journal B 2905/02.05.2023) that entered into force on 2 May 2023.** This Decision classifies the workers and professionals in the Creative and Cultural sector on the basis of the applicable business activity and employment specialization classifications.

This reform shall introduce labour and social security legislation for the cultural and creative sector with a view to increasing the share of declared work in the sector

The introduction of proportionate tax incentives constitutes a credible effort to reward professionals in the cultural and creative sector for officially restarting previously interrupted business operations. It provides a tangible incentive directly aiming at increasing the declared work in this sector. Rewarding those Creative and Cultural sector (CCS) professionals who kept their business going during the period of financial crisis, being a proportionate and equitable measure, is no less of an important effort to attain the above objectives. Moreover, the introduction of an obligation of the employers for fair remuneration and respective social security contributions regarding rehearsals of theatre, dance and music productions according to Article 111 of Law 5039/2023 aims to suppress undeclared work in the industry. It provides a balanced, clear-cut solution to a structural problem, which results to the effective protection of labor and social security rights of workers in the cultural

and creative sector, thereby serving as an incentive to CCS workers to provide declared, lawfully remunerated and fully insured work.

This reform shall introduce labour and social security legislation for the cultural and creative sector with a view to supporting the industry’s professionals and protecting their intellectual property rights.

This objective is notably fulfilled by Article 48 of Law 4821/2021 for which the relevant provision (Article 48) entered into force on 31 April 2021. The Law establishes various, mainly preventive measures taken by the Hellenic Telecommunications and Post Commission following an application of suspected violation of IP rights related to broadcasted events (either local or not) such as sport or cultural events as well as by the implementing Joint Ministerial Decision of the Ministers of Digital Governance and Culture and Sports No 4419 (Official Journal B 4345/20.09.2021). The measures are targeted to forcing internet access providers to interrupt access to illegal content, extending to all related URL’s, IP addresses and domain names. By adopting a set of rules mindful of all technical aspects of the targeted IP violations, while avoiding lengthy bureaucratic procedures, Article 48 aims to combat large scale intellectual property rights violations related to broadcasted events.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 302	Related Measure: Modernise and improve resilience of key economic sectors – New Industrial Parks (Measure ID: 16634)	
Name of the Milestone: Industrial Parks – legislative reform (primary law)		
Qualitative Indicator: Publication of legislation in Official Journal		Time: Q3 2022
<p>Context:</p> <p>The measure aims to provide financial assistance for: a) the establishment of new, next-generation industrial parks; b) expansion of the existing ones, with a view to increasing their readiness for transition to 5G and ultra-high bandwidth network infrastructure and use of renewable energy sources, smart energy management and energy saving interventions, and circular economy infrastructure; and c) the transformation of areas with high industrial concentration to green and digitalized industrial parks. The measure also includes a reform of the regulatory framework for industrial parks, including addressing legal uncertainties, resolving governance issues, and providing effective incentives for the resolution of informal industrial concentrations.</p> <p>Milestone 302 requires the enactment of primary legislation to improve the regulatory framework for industrial parks, including addressing legal uncertainties, resolving governance issues, and providing effective incentives for the resolution of informal industrial concentrations.</p> <p>Milestone 302 is the second milestone of the measure, and it follows the completion of milestone 301, related to the launch of a competitive call for proposals for the development of industrial parks as per the eligibility requirements set under this measure. It will be followed by milestone 304, related to the entry into force of all necessary secondary legislation to operationalise the new framework enacted under the current milestone 302, and milestone 307, related to the completion of construction of all investment projects selected under the competitive call for proposals. The measure has a final expected date for implementation in Q4 2025.</p>		

Evidence provided:

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

Summary document

- i. Copy of Law 4982/2022, Official Journal 195/A/15.10.2022, *“Establishment, development, management and operation of Business Parks - Unified regulatory framework for Organized Receptors for Manufacturing and Business Activities and other provisions to enhance development”*, which regulates sites intended for manufacturing and related activities
- ii. Copy of Law 5007/2022, Official Journal 241/A/23.12.2022, *“Integrated Palliative Care Provision Arrangements to deal with the COVID-19 pandemic and to protect public health and other emergency arrangements”* (article 98), concerning, inter alia, the Operating Regulation for organized receptors for manufacturing and business activities
- iii. Copy of Law 5019/2023, Official Journal 27/A/14.02.2023, *“Incorporation of Directive (EU) 2020/1828 of the European Parliament and of the Council of 25 November 2020 regarding representative actions for the protection of the collective interests of consumers and for the repeal of Directive 2009/22/EC, strengthening the protection of consumers, regulatory framework for wine aging and other urgent provisions”*, (article 91), concerning, inter alia, the implementation of incentives in existing businesses within organized receptors for manufacturing and business activities
- iv. Copy of Law 5039/2023, Official Journal 83/A/03.04.2023, *“Measures to support relatives of the victims and those affected by the February 28, 2023 Tempe train accident, pension provision, provisions to enhance transportation safety, provisions to enhance development, interventions to modernize tourism legislation and other emergency provisions”*, (article 8), concerning, inter alia, the conditions for securing the land area during the development and the expansion of the business park, and the reciprocal services by the development and management company

Analysis:

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

Enactment of primary legislation to improve the regulatory framework for industrial parks

In line with the requirement of the milestone to enact primary legislation to improve the regulatory framework for industrial parks, the Greek authorities adopted Law 4982/2022 unifying the regulatory framework for all types of sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities), which include industrial parks, and creating a single type, i.e. business parks (hereinafter referred to as "parks"). The law entered into force on 15 October 2022, as per article 112. In addition, the Greek authorities adopted three subsequent amendments to specific articles of Law 4982/2022 in order to ensure the correct interpretation and application of the said articles in line with the purpose of the initial provisions. Specifically, these amendments took place via the adoption of:

- article 98 of Law 5007/2022, which entered into force on 23 December 2022, as per article 129, and which amended articles 47(10) and 47(11) of Law 4982/2022,
- article 91 of Law 5019/2023, which entered into force on 14 February 2023, as per article 103(1), and which amended articles 28(6) and 46(12) of Law 4982/2022, and

- article 8 of Law 5039/2023, which entered into force on 3 April 2023, as per article 152, and which amended articles 9(5), 17(1) and 25(3) of Law 4982/2022.

The abovementioned amended provisions aim at addressing deficiencies of the previous regulatory framework on sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities), which includes industrial parks. Key weaknesses of the previous regulatory framework include the non-viability of the economic model for the development of sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities) by investors; legal bottlenecks arising from opportunistic requests for the development of these sites that end up in perpetual court disputes that block the materialisation of the investments; the lack of insufficient incentives for the development or modernization of these sites through investments (for instance, in electricity and telecommunication networks, waste treatment facilities, security); the difficulty to secure the minimum land requirements needed for the development of these sites due to high degree of land fragmentation in Greece; the lack of effective provisions to tackle the chronic problems relating to the use of abandoned production units (often without proper disposal of hazardous materials) and idle land plots within these sites; the disproportionate restrictions for the development and/or expansion of these sites in specific areas; and the multiplicity of regulatory regimes governing all the different types of sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities). Previously, these organised receptors for manufacturing and business activities were regulated simultaneously by three different laws, namely law 4458/1965 (A' 33), 2545/1997 (A' 254) and articles 41 to 63 of Law 3982/2011 (A' 143), depending on the time of issuance of the approval for their establishment and their inclusion in the respective regime.

In particular, improvements of the regulatory framework to address the above are demonstrated via the following articles of Law 4982/2022:

- **Article 6** eliminates the segregation between the development and commercial exploitation of the business park (which is now established as the single type of organized receptors for manufacturing and business activities) by introducing the possibility for an investor to undertake both roles through the establishment of a single entity for the development, management and commercial exploitation of the business park (hereinafter referred to as "Development and Management Company"). This provides for more certainty of the expected rate of return on the investment. Further, the requirement of a minimum amount of share capital for the Development and Management Company is abolished, thus making it easier for investors to undertake the investments in new parks.
- **Article 14** provides for the possibility of a direct concession to the Development and Management Company for the use of the coastline and the right to carry out, the use and the exploitation of port projects or the expansion of the port facilities already existing in the area. This makes easier for investments in parks to take place.
- **Article 18** provides for the possibility of developing a park via a public-private partnership, or by granting the use or lease of public or municipal real estate, or real estate of companies that are directly or indirectly owned by the state. This makes easier the development of parks.
- **Article 21** allows, for the first time, the approval and development of a park in two or more distinct geographical areas, within the same wider geographical area, thus making easier the development of new parks or the expansion of existing ones.
- **Article 31** introduces an obligation to the owners of buildings within parks to utilize these within a certain time so that the property fulfills its purpose and does not end up as an idle

and abandoned building. In the case of non-compliance with the foreseen timeline, the article further introduces the possibility for the enactment of an expropriation procedure in favour of the Management and Development Company, by decision of the Ministry of Development and Investment. This allows for the full exploitation of parks and tackles the problem of lack of available capacity in parks of high demand.

- **Article 47** foresees the eventual transition after a set period of time, of all the fragmented regulatory regimes governing the different types of sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities) into the provisions of the new law, by codifying previous legislation and creating a unique legal framework for their development and operation (now to be referred by the common term "business park"). This is expected to facilitate legal clarity and a level-playing field among park investors and businesses established within parks.

Enactment of primary legislation to improve the regulatory framework for industrial parks, including addressing legal uncertainties

In line with the requirement of the milestone to enact primary legislation to improve the regulatory framework for industrial parks, and more specifically to address legal uncertainties, the adopted Law 4982/2022 introduces several improvements. Key deficiencies of the previous regulatory framework pertain to the uncertainties created over the ownership of shared land areas within the sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities), including industrial parks. Such legal uncertainties disrupted the smooth functioning and commercial exploitation of the site as a whole. Coupled to that, the high degree of fragmentation of land ownership prevalent in most cases, especially among the Development and Management Company and businesses established within these sites, exacerbated these legal uncertainties.

In particular, the following articles contribute to this end:

- **Article 8** abolishes the requirement for a minimum land area of 50,000 square meters for the development of the park. This makes it easier for the investor to secure land needed for the development of a new park, regardless the size of the area in question. Further, the article provides that the investor must be the owner of the entire area to be occupied by the park (or alternatively of at least 80% of the total area, under certain conditions). This is expected to limit the ownership of the land area to one owner (or to few owners, under certain conditions), hence reducing the possibility of legal disputes when it comes to the right to take decisions concerning the management and exploitation of the park.
- **Article 12** provides that shared and public areas belong in their own right to the Management and Development Company, by the approval of the zoning plan. This eliminates the legal uncertainty over ownership and management of these areas.

Enactment of primary legislation to improve the regulatory framework for industrial parks, including resolving governance issues

In line with the requirement of the milestone to enact primary legislation to improve the regulatory framework for industrial parks, and more specifically to resolve governance issues, the adopted Law 4982/2022 introduces several improvements. Specifically, the content and the process of establishing/amending the internal regulation for the operation of the sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities) were not fit for purpose, mainly due to state intervention. This led to governance problems between

the company that developed these sites, and the companies established within the sites. In particular, the following articles contribute to this end:

- **Article 23** abolishes state intervention in the internal regulation for the operation of the business park as the regulation is not anymore subject to approval by the Ministry of Development and Investments, thus ensuring a more flexible and appropriate process to define the rights and obligations of the two sides in line with the principles of free competition.
- **Article 27** provides, for the first time the possibility of transferring the administration and management of a park to a new entity, under certain conditions, under free market conditions.

Enactment of primary legislation to improve the regulatory framework for industrial parks, including providing effective incentives for the resolution of informal industrial concentrations

In line with the requirement of the milestone to enact primary legislation to improve the regulatory framework for industrial parks, and more specifically to provide effective incentives for the resolution of informal industrial concentrations, the adopted Law 4982/2022 introduces several improvements. The chronic problems associated with underinvestment in the sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities) in Greece, reduced demand by businesses to establish their operations within these sites. Over the years, this gave rise to the development and proliferation of informal industrial concentrations (i.e. areas outside any form of organized receptors for manufacturing and business activities not intended for industrial use, in which industrial activity has been established). Areas that have been occupied by such informal industrial concentrations traditionally suffer from environmental degradation as a result of the industrial activity, due to the lack of appropriate infrastructure and rules on the disposal of waste. Further, incentives under the previous regulatory framework proved insufficient to promote the resolution of informal industrial concentrations that exist in Greece, either by i. effectively incentivising the relocation of companies established in informal industrial concentrations to sites intended for manufacturing and related activities (organized receptors for manufacturing and business activities); or ii. by incentivising investors to undertake the development of a so called ‘business rehabilitation park’ (which is a means for resolving an informal industrial concentration through the development and implementation of a rehabilitation plan for the affected area).

In particular, the following articles contribute to this end:

- **Article 11** now makes possible, under specific conditions, the issuance of building permits for construction, and the installation and operation of new businesses within parks, even before the approval of the Regional Implementation Plan (article 11(8)). This is expected to alleviate a previously significant disincentive to investors of business rehabilitation parks, as investment plans were often frozen or aborted until the new Regional Implementation Plan was approved. Further, the article provides that the removal of fencing in rutted parts of the park and the construction of new fencing is exempted from the obligation to obtain a building permit, as fencing is now considered a part of the park’s infrastructure (Article 11(9)). This is expected to expedite construction, especially in the case of informal industrial concentrations, where the replacement and development of such infrastructure is most needed. Lastly, owners of businesses operating within parks are exempted from infrastructure expenditures, as these are undertaken by the Management and Development Company.

- **Article 20** foresees that in the case of informal industrial concentrations of special interest to the Greek State (for instance, those concerning large-scale developments, or areas seriously affected by environmental degradation), the Ministry of Development and Investments is allowed to launch a call for expressions of interest for the development of a business rehabilitation park without applying the existing 55% minimum requirement of land ownership by the Management and Development Company. This is expected to lead to a significant acceleration of the procedures for the approval and implementation of the rehabilitation plan. Further, the article foresees that expropriation costs can be considered eligible for subsidisation in the case of such informal industrial concentrations of special interest to the Greek State. Lastly, the development of a business rehabilitation park becomes more attractive, as there no restriction regarding the establishment of business activities, regardless of their environmental classification category, as long as it is permissible according to the land uses of the area.

Article 28 provides for financial incentives to investors undertaking the development of a park, as well as licensing incentives for the establishment of businesses within parks. This is expected to incentivise the establishment of new businesses within parks, as well as the relocation of existing businesses currently operating in informal industrial concentrations within parks.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 311	Related Measure: Modernise and improve resilience of key economic sectors – Digital Transformation of the Agri-Food Sector (Measure ID: 16653)	
Name of the Milestone: Launch of the call for the digital transformation of the agri-food sector		
Qualitative Indicator: Launch of the call		Time: Q3 2022
<p>Context:</p> <p>The objective of this investment is to promote the adoption of innovative technologies in the Greek agriculture sector, the fight against Greek product counterfeiting, facilitate access to foreign markets for Greek food products, as well as develop new agri-food knowledge in Greece and deploy best practices. The investment comprises interventions (a) to support the digital transformation of the agricultural sector such as the development of a large-scale open digital infrastructure, with cloud infrastructure and large-scale processing capabilities of satellite and aerial data, and (b) to promote trade in Greek agricultural products, stock-farming and fisheries by facilitating issuance of export certificates, developing a system for the management of import and intra-community trade data and a business intelligence system for imports and trade and the development of an outward-looking portal for the promotion of Greek agri-food and agricultural products.</p> <p>The milestone concerns the launch of the call for the digital transformation project for the development of a large-scale open digital agricultural infrastructure and a cognitive agriculture environment for the production process and management of natural resources.</p> <p>Milestone 311 is the first step of the implementation of the investment, and it will be followed by milestone 313, related to the completion of the digital transformation of agriculture project, with the outward-looking agriculture digital services incorporated in the Easy Agro Expo platform. The investment has a final expected date for implementation of Q2 2025.</p>		

Evidence provided:

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

- i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled
- ii. Published call of tenders 14655 on 24 August 2022 for sub-project 1 “The digital transformation of the agricultural sector such as the development of a large-scale open digital infrastructure, with cloud infrastructure and large-scale processing capabilities of satellite and aerial data (“Diavgeia” Internet uploading number: ADAM: 22PROC011158570 2022-08-30)
- iii. Published call of tenders 20967 on 28 November 2022 for sub-project 2 “Outward-looking portal for the promotion of Greek agri-food and agricultural products”, showing that the competition is open to applications (“Diavgeia” Internet uploading number: ADAM: 22PROC011762559 2022-12-08).

The authorities also provided:

- iv. Print screen of the electronic public procurement platform
- v. Supplementary printout from Tenders Electronic Daily for subproject 1, including an amendment to the time limit for the receipt of tenders or requests to participate as well as the date in the chapter "Conditions for opening tenders".

Analysis:

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

Launch of the call for the digital transformation project for the development of a large-scale open digital agricultural infrastructure and a cognitive agriculture environment for the production process and management of natural resources.

In line with the requirements of the Council Implementing Decision, on 24 August 2022, Greece published two separate calls for tender for the selection of the contractor under the measure 16653 "Digital Transformation of the Agricultural Sector". This measure is implemented through two subprojects a) Digital Transformation of the Agricultural Sector b) Outward-looking Agriculture, that, taken together, cover all the requirements of the Council Implementing decision. The call for subproject 1 was launched on 30.08.2022 and the call for subproject 2 was launched on 08.12.2022, inviting interested parties to submit their tender proposals. The two calls are uploaded in Diavgeia with ADAM number 22PROC011158570 2022-08-30 and 22PROC011762559 2022-12-08 respectively.

In line with the description of the measure, the investment promotes the adoption of innovative technologies in the Greek agriculture sector, the control of Greek product counterfeiting, facilitates access of Greek food products into foreign markets, as well as develops new agri-food knowledge in Greece and deploys best practices. The abovementioned elements are elaborated in the call for subproject 1, in section I.1.2 “Purpose and objectives of the contract” & section I.3 “Subject of the contract” and are in line with the requirements set out in the description of the measure in the Council Implementing Decision.

Further, the requirement set out in the description of the measure in the Council Implementing Decision, concerning the support of the digital transformation of the agricultural sector through the

development of a large-scale open digital infrastructure, with cloud infrastructure and large-scale processing capabilities of satellite and aerial data, is covered and described in section I.3.2 “Requirements, Functional and Technical Specifications”. Finally, the requirement of the measure regarding the promotion of trade in Greek agricultural products, stock-farming and fisheries by facilitating issuance of export certificates, developing a system for the management of import and intra-community trade data and a business intelligence system for imports, is specified in section I.2 “Project’s scope, objectives and critical success factors” and section I.3 “Operational and technical specification of the project” of the call for tender for subproject 2.

Commission Preliminary Assessment: Satisfactorily fulfilled

Number: 325	Related Measure: Loan Facility (Measure ID: 16980)		
Name of the Target: EUR 3518.4 million of financial institutions funds signed with final beneficiaries			
Quantitative Indicator: Percentage of funds signed	Baseline: 5	Goal: 30	Time: Q4 2023
<p>Context:</p> <p>The objective of this investment is to use the loan support under the Recovery and Resilience Facility to facilitate the provision of financial incentives to the private sector and promote private investments. The Loan Facility makes use of different distribution channels, among which on-lending through international financial institutions and commercial banks (EUR 11,728 million).</p> <p>Target #325 refers to the on-lending distribution channel and consists of the signature of contracts between financial institutions and final beneficiaries amounting to EUR 3,518.4 million (including management fees) of Loan Facility funds.</p> <p>This target (#325) concerns the sixth step of implementation of the investment and is preceded by target #324 (due in Q4 2022), which was part of the second payment request. The target is followed by: (i) target #326 concerning the signature with final beneficiaries of EUR 5,864 million of financial institutions funds (due in Q4 2024); (ii) target #327 concerning the signature with final beneficiaries of EUR 9,382.4 million of financial institutions funds (due in Q4 2025); (iii) target #328 concerning the signature with final beneficiaries of EUR 11,728 million of financial institutions funds (due in Q2 2026).</p> <p>Further upcoming targets of this investment that belong to other distribution channels are target #329 (due in Q2 2026) and target 330 (due in Q2 2026).</p> <p>On 21 November 2023, the European Commission positively assessed a revision of the Recovery and Resilience Plan of Greece, which includes a request to add EUR 5 billion of RRF loans to the Loan Facility. This revision is under consideration by the Council.</p>			
<p>Evidence Provided:</p> <p>In line with the verification mechanism set out in the Operational Arrangements, the following evidence was provided:</p> <ul style="list-style-type: none"> i. Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled. 			

- ii. Report by the Ministry of Finance (protocol number 156590 EΞ 2023 of 24.10.2023) including the following information on the target completion:
- disbursement schedule of the tranches and the allocation of funds;
 - information on investment costs contributions;
 - key measurable objectives such as number and volume of signed loan contracts (including information on the Loan Facility strategic pillars) and projects' progress;
 - Key Performance Indicators (KPIs) on loan values, deferred loan service payments, loans' performance, and interest paid.

The authorities also provided:

- Reports submitted by eight financial institutions on the target completion, relevant to each institution.

Analysis:

The justification and substantiating evidence provided by the Greek authorities covers all constitutive elements of the milestone. In line with the requirements of the Council Implementing Decision:

EUR 3518.4 million (including management fees) of RRF loan facility funds related to International Financial Institutions and commercial banks have been signed with the final beneficiaries in accordance with the mandate defined in the milestone and following ex-ante verification by independent auditors of compliance with governance, selection, monitoring and audit and loss-sharing criteria, the Do No Significant Harm Technical Guidance (2021/C58/01) and with the 38.5% climate target and 20.8% digital target.

- i. Funds have been signed with final beneficiaries: Overall, EUR 3,535.1 million (including management fees) of Loan Facility funds have been signed between eight financial institutions - European Investment Bank (EIB), European Bank for Reconstruction and Development (EBRD), National Bank of Greece, Piraeus Bank, Alpha Bank, Eurobank, Optima Bank, Pancreta Bank - and final beneficiaries. This amount exceeds the target required by the Council Implementing Decision (EUR 3,518.4 million). The amount concerns 234 loan contracts in the following Loan Facility strategic pillars: green transition; digital transformation; innovation - research and development; extroversion.
- ii. The mandate has been complied with:
- a. With reference to investments costs contributions, the RRF loans cover 41.38% (maximum 50% required), the financial institutions' co-financing loans cover 34.33% (minimum 30% required), and the final beneficiaries' participation covers 24.29% (minimum 20% required).
 - b. The funded investments have a positive net present value and the decision-making for each investment was based on sound economic criteria according to the financial institutions' internal criteria, policies and procedures, at arms' length from the government.
 - c. Key performance indicators were set for the monitoring of disbursed loans, and financial institutions provided the relevant information as per the Loan Facility framework and the operational agreements signed with Greece. Specifically, the key performance indicators for the loan contracts signed demonstrate:

- Value of loans disbursed to final beneficiaries over total value of loan contracts signed: EUR 853.7 million loans disbursed to final beneficiaries over EUR 3,535.1 million loan contracts signed.
 - Value of deferred loan service payments over total value of ordinary loan service payments: There were no deferred loan service payments.
 - Value of performing loans over total value of loan portfolio and corresponding values for loans under restructuring and the different categories of non-performing exposures in the loan portfolio (0-90 days past due; over 90 days past due but non-denounced; denounced loans), including the recoveries related to each of these categories of non-performing exposures: All current RRF loans are performing at 100% of the loan portfolio.
 - Value of interest paid over value of accrued interest: The value of interest paid is EUR 2.4 million. There are no deferred loan service payments, therefore there is no difference between interest paid and accrued interest.
 - Value of interest paid over value of loans disbursed to final beneficiaries: EUR 2.4 million interest paid over EUR 853.7 million of loans disbursed to final beneficiaries.
- d. Evaluations were carried out by the financial institutions and independent auditors on eligibility prior to the provision of financing (see further details in point iii below).
 - e. The Greek State and the financial institutions participate *pari passu* on loans losses, collaterals and repayments, and all decisions regarding restructuring are to be allocated exclusively to the financial institutions, if / when applicable.
 - f. According to the signed loan contracts, there was no refinancing of outstanding loans and no State guarantees provided.
 - g. Each funded investment should comply with the Do No Significant Harm Technical Guidance (2021/C58/01) of supported activities, requiring the use of sustainability proofing, an exclusion list, and mandatory legal compliance checks with the relevant EU and national environmental legislation by an independent auditor.

iii. Independent auditors verified ex-ante for each project:

- a. The existence of an eligible investment and of a given budget.
- b. The investment project's categorisation under the Loan Facility strategic pillars.
- c. The compatibility of the interest rate granted considering relevant State aid rules.
- d. That the project does not already benefit from double funding either from the Recovery and Resilience Facility or any other Union funding programme for the same expenditure.
- e. The project's alignment with the Do No Significant Harm Technical Guidance (2021/C58/01) confirming:
 - Compliance with the relevant EU and national environmental legislation.
 - The application of the climate and environmental sections of the Commission's technical guidance on sustainability proofing for the InvestEU fund (2021/C 280/01).
 - That the project does not relate to activities excluded from eligibility. Four loan contracts concern the purchase of plug-in hybrid vehicles and electric vehicles. Assets related to fossil fuels, including downstream use, should be excluded in line with the requirement of the Council Implementing Decision. However, in practice, compliance with the 'Do No Significant Harm' Technical Guidance (2021/C58/01) has been ensured through the ex-ante verification by independent auditors who verified that only plug-in hybrid vehicles emitting less than 50g CO2 per km will be financed, in line with the 'Do No Significant Harm' Technical Guidance. Whilst the lack of proper

application for those four loan contracts of point (i) of the exclusion list constitutes a minimal substantive deviation, it does not affect the progress towards the achievement of the policy objective of the investment that the target represents as compliance with the 'Do No Significant Harm' Technical Guidance (2021/C58/01) has been ensured. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the target represents. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

- f. The contribution of the project to the climate transition and the digital transition, in accordance with the methodology in Annexes VI and VII of the Recovery and Resilience Facility Regulation (including the relevant intervention fields), and the compliance by the financial institutions with the relevant legal commitments undertaken regarding the climate and digital commitments. In addition, the compliance with the climate and digital commitments is audited ex-post at the portfolio / tranche level as provided in the mandate.

Commission Preliminary Assessment: Satisfactorily fulfilled