

Avosetta Meeting
May 29th/30th 2026 – Copenhagen
“Instruments of Climate Mitigation and Energy Transition”

Greek Report: Vasiliki (Vicky) Karageorgou*

Panteion University of Social and
Political Sciences, Athens, Greece

1. Political Situation

Is EU climate (and energy transition) policy generally supported or viewed critically in the respective national political context? How has national climate (and energy transition) policy developed in recent years? What are the prospects for future political developments? What are the key climate (and energy transition) policy controversies in the national political debate? What has been the role of the Courts in your national context?

PAG
F

a) In certain surveys, dealing with climate change is being perceived as an important concern of the Greek citizens. According to the latest Eurobarometer survey, environmental protection and climate change comes at the 6th rank among the issues which should be addressed in priority by the European Parliament.¹ Furthermore, while in other surveys climate change and environmental destruction is being perceived as the most significant problem that the planet currently faces, when it comes to Greece the cost of living crisis and the economy are considered to be the top concerns of the citizens.² Therefore, citizens are mainly concerned about the rising cost of living, while the extreme weather events (floods, fires) raise at least temporarily the awareness on the environmental issues. It is also worth noting that the climate policies as well as the policies for sustainable energy transition have not been extensively discussed in the two electoral campaigns for the national elections in 2023 as well as in the electoral campaign for the European Elections.

Furthermore, green parties are not represented in the Greek Parliament³ and did not also gain a seat in the European Parliament as well. Instead, the climate-sceptic and far right party “Niki” (Victory) and the far-right Party “Helleniki Lysi” (Hellenic solution), which is in favor of the continuation of the lignite-power stations and the drilling of hydrocarbons, are both represented in the Parliament. In this context, it is also worth referring that in a recent research which was conducted within the framework of the elaboration of a master thesis in the Aegean University and concerned the adoption of conspiracy theories with regard to climate change in Greece, 17.8 % of the citizens that participated in the survey accept conspiracy theories about climate change and 22,5% of the participants find themselves in the “grey zone

*I am deeply indebted to Ariti Tsoukala, Environmental Lawyer, LL.M in Public Law and LL.M in Environmental Law, National and Kapodestrian University of Athens (Greece) for her substantial contribution in the preparation of the report.

¹ European Parliament, Eurobarometer, EP Autumn Survey 2025, Factsheet Greece.

² National Survey on Climate Change: Perceptions, Threats and Challenges for creating a new environmental culture, 2022. The survey was conducted by Metron Analysis on behalf of the Greek Ministry for Climate Crisis and Civil Protection, while the questionnaire was by the Think Tank Dianoesis.

³ K. Zafeiropoulos, Facing Greece’s Climate Reality, Green European Journal, 10.1.2024, available at: <https://www.greeneuropeanjournal.eu/facing-greeces-climate-reality/>.

of uncertainty” with regard to the topic. Therefore, only 59.7% of the participants explicitly reject the conspiracy theories on climate change. Furthermore, 26,1% of the participants in the survey believe that under the veil of climate change powerful elites attempt to impose a new order of things, while 39,9% of the participants believe that the wildfires in recent years can be attributed to an organized plan that aims to promote the installation of wind parks.⁴

b) Greece’s climate and energy policies are substantially determined by the respective EU legislative and policy framework. Due to the EU influence, Greece’s reliance on fossil fuels was gradually decreased. Greece achieved its 2020 EU targets for GHG emissions, share of renewable energy and energy consumption.⁵ A significant milestone was the adoption of the National Energy and Climate Plan (NECP), as it is required by the Governance Regulation. The NECP has set specific targets for greenhouse gas emissions and determined the Greek energy mix until 2030 year by increasing the participation of natural gas and renewable energy sources.⁶ The NECP was updated in 2025.⁷ The updated NECP outlines three overlapping phases: the first phase (2025-2030) concerns the decarbonisation of electricity generation, the second phase concerns the electrification of energy use (2030-2040) and the third phase concerns the widespread decarbonisation of hard-to-abate sectors through hydrogen and synthetic fuels (2040-2050). Greece submitted its national recovery and resilience plan (NRRP) to the Commission in April 2021, and has since updated it three times, adding a REPowerEU chapter in December 2023. The Greek plan amounts to €36.6 billion (€18.2 billion in grants, €17.7 billion in loans, and national co-financing).

Another significant milestone was the adoption of the National Climate Law (Law 4936/2022, Official Government Gazette Issue A/105/27.05.2022), which endorses the climate neutrality objective of the EU Climate Law. A significant feature of the National Climate Law is that it has set a prohibition of electricity generation from lignite-power plants from 1.1.2029(article 11 of the Law 4936/2022). The Law also sets carbon budgets for certain sectors of the economy (transport, buildings, non-inter-connected islands, industry, agriculture) in line with the provisions of NECP (article 7 of the Law 4936/2022). In addition to this, Law contains certain provisions on electric mobility (article 12) and on fuels used for heating (article 17). The National Climate Law also aims to strengthen the climate change dimension in the environmental licensing procedure by requiring that the EIA Study must also contain an analysis of the impact of the project on the climate, *including* the nature and the extent of the projected emissions also in relation to the current situation, an analysis of the vulnerability of the project with regard to climate change and an assessment of the compatibility of the project with regard to the achievement of the objectives set in the

⁴ Theodoros Arabatzis, Adoption of Conspiracy Theories with regard to Climate Change in Greece, Master Thesis, Aegean University, 2026.

⁵ EEA Report No 10/2022, Trends and projections in Europe 2022.

⁶ Ministry of Environment and Energy, National Energy and Climate Plan (NECP) Greece, 2019. Available online: <https://ypen.gov.gr/energeia/esek/> (accessed on 22.04.2026).

⁷ Ministry of Environment and Energy, National Energy and Climate Plan (NECP), Revised version, August 2024. The revised version of NECP was ratified by the Government Council of Economic Policy and published in Official Government Gazette Issue (6983/B/19.12.2024). The Plan is available at: <https://ypen.gov.gr/wp-content/uploads/2025/04/%CE%91%CE%BD%CE%B1%CE%B8%CE%B5%CF%89%CF%81%CE%B7%CE%BC%CE%AD%CE%BD%CE%BF-%CE%95%CE%A3%CE%95%CE%9A-2024-%CE%A6%CE%95%CE%9A-6983.pdf> (in Greek)

NPEC (article 18). It is also of significance that licensed installations and projects that are classified as posing significant effects on the environment are obliged to reduce their emissions by 30 percent until 2030 using the year 2019 as a calculation basis (article 19).

In a comprehensive perspective, the National Climate Law constitutes a first positive step in the right direction. However, it suffers certain deficiencies. First, it does not set any legally binding target for the phase out of the use of natural gas. Moreover, it does not set a timeframe for the phase-out and the prohibition of hydrocarbon research, exploration and extraction activities. In addition to this, it does not set specific and binding deadlines in which sectoral climate targets have to be reached. The Law does not contain any provisions concerning public engagement in the decision-making procedures concerning the climate issues. It is only foreseen that the dialogue between the government and the public is enhanced by creating a 'climate dialogue' website (Article 26). Furthermore, a National Climate Change Council is established, which acts as the Public's representative body.

PAG
Γ

Greece adopted Law no. 5106 of 2024 on arrangements to address the multi-level impacts of climate change in three areas: (i) water, forests and natural environment; (ii) sustainable and resilient urban areas, spatial and urban planning; and (iii) renewable energy services and energy costs of vulnerable households.

c)The central-right government is focused mainly on energy security and energy autonomy being conjunctively perceived as a component of geopolitical security, while at the same time policies to achieve climate neutrality are also being pursued. In the last period specific emphasis is placed on hydrocarbon exploration and exploitation. Recently, Law 5287/2026 (Official Government Gazette Issue 41/A/16.3.2026) was adopted, by which four lease agreements that grant a Chevron-led consortium the rights to explore and exploit natural gas and hydrocarbons in maritime blocks south of Crete and the Peloponnese, were ratified. The concessions, which are designated as South Crete 1, South Crete 2, South of Peloponnese, and Block A2, cover approximately 47,000 square kilometers of ultra-deepwater territory. Therefore, 20% of the country's maritime territory is leased to oil companies. During the ratification process of the lease agreements, an eminent environmental NGO, WWF Hellas, submitted a brief to the Members of the Parliament. In that brief, the following concerns were raised with regard to the respective exploration and drilling: a) the extremely weak environmental safeguards governing the exploration and exploitation process b)the clear focus on offshore drilling c)the negligible public revenues and d)the insufficient provisions on monitoring, as inspections are allowed only after prior notice.⁸ It is also worth referring that 3 environmental NGOs (WWF Hellas, Greenpeace Greece and ClientEarth) filed a complaint to European Commission in December 2023, by which they required European Commission to take immediate action against Greece, because the authorization of the exploration and exploitation of offshore oil and gas violates EU Nature Conservation Legislation and marine protected species.⁹ It is also worth noting that there is a rather strong Citizen's

⁸ WWF Hellas Factsheet, New Oil and Gas Blocks in Greece, March 2026.

⁹ NGOs urge European Commission to intervene as Greece flouts EU law for benefit of oil and gas activities, available at: <https://www.clientearth.org/latest/press-office/press-releases/ngos-urge-european-commission-to->

Initiative in Crete that opposes the exploration and exploitation of hydrocarbons (Initiative against the exploration and exploitation in Greece).

d) Given the fact that citizens strongly focus on the cost-of-living crisis and the climate policy issues are not high on the agenda, no significant changes are expected soon. Even the social-democratic PASOK does not strongly oppose hydrocarbon exploitation and exploration for environmental reasons.

e) Environmental-related disputes are adjudicated at first and last instance by the Council of State, country's Supreme Administrative Court. The Court exercises legality control on the respective administrative acts or on the omissions of the administration that are challenged before the Court through the submission of petitions of annulment. Within the framework of the review of the administrative acts, the Court can also exercise control of the constitutionality of the legislative acts on which the former are based. Given the fact that Article 24 of the Greek Constitution enshrines the protection of the environment as a duty of the State and as right of every person, the Court can review whether the legislative provisions under consideration satisfy the constitutional safeguards, which set in the afore-mentioned constitutional provision, as it has been interpreted by the Court. In the respective jurisprudence of the Council of State, the protection of climate is being perceived as an integral component of the constitutionally guaranteed protection of the environment. Therefore, the Court has justified the authorization of wind parks in nature protection areas as a means for reaching the international and EU commitments to combat climate change (Decision 47/2018). Furthermore, the role of forests as carbon sinks is also underlined to justify their strict protection.

PAG
Γ

2. Overall Climate Policy Targets

Are the EU's overall climate targets (2035/2040/2050) considered adequate / too ambitious / insufficient in national politics? Has the Member State set more ambitious national climate targets ("gold plating")? If so, what additional national targets are being pursued?

In Greek politics, EU climate targets are considered adequate for contributing to the achievement of the collective objectives of the Paris Agreement. Far-right parties consider EU Climate targets as too ambitious and unrealistic. No additional climate targets have been set. It is also worth noting that in accordance with Article 1 (2) of the National Climate Law (Law 4936/2022) the national target which must be reached by 2040, requires a 80% emission reduction compared to 1990 levels. The target must be readjusted, to be aligned with the EU 2040 climate target (90% emission reduction compared to 1990 levels).

[intervene-as-greece-flouts-eu-law-for-benefit-of-oil-and-gas-activities/](#). A new study, which was commissioned by ClientEarth, is very recently published in Ethics and Science in Environmental Policy and reveals the threats posed to marine mammals near to Marine Protected Areas because of the oil and gas exploration projects. In the wave of this study, NGOs renewed their call to the Commission to take action against the authorization of the respective projects. See ClientEarth, New study shows devastating impacts of oil and gas surveying on Mediterranean sea life, Press Release 27.04.2026, available at: <https://www.clientearth.org/latest/press-office/press-releases/new-study-shows-devastating-impacts-of-oil-and-gas-surveying-on-mediterranean-sea-life/>.

3. Emission Trading System I (Industry)

Is ETS I considered appropriate? If not, what reforms are viewed as priorities from the national perspective?

To my knowledge, there is no discussion about the appropriateness and the effectiveness of ETS1. In accordance with a recent report “Trends in the Emissions Trading System in the European Union and Greece, 2005-2024”¹⁰, which was elaborated by the Think Tank “Green Tank”, Greece ranks 6th among EU member states in reducing emissions from electricity and heat production and energy-intensive industry between 2005 and 2024, with a 63.9% drop. It is though worth noting that emissions from power generation were increased in 2024, a fact that can be attributed to the increased use of fossil gas for electricity production, a part of which was used for electricity exports. There was a marginal decline of 0.3% in emissions from Greek industry between 2023 and 2024. In accordance with the report, fossil gas-based electricity production was the most polluting activity in Greece in 2024, followed by oil refining and cement production. In this context, it is also worth referring that contrary to the EU’ s supportive position, Greece abstained from a critical vote procedure for the approval of International Maritime Organization’s Net Zero in October 2025.

PAG
Γ

4. Emission Trading System II (Buildings and Road Transport)

What share of national total energy consumption is attributable to buildings and road transport? Is the postponement of ETS II to 2028 viewed positively? Are buildings and road transport already part of a national regulatory regime that anticipates elements of ETS II? How are the prospects for decarbonizing the national building and transport sectors assessed?

a)According to International Energy Agency, transport is the largest energy consuming sector holding 41% of the final energy use in 2023 in Greece, while the residential sector is the second energy consuming sector holding 26% of the final energy use in the same year.¹¹ In specific, according to a report elaborated in the framework of the Odyssey-Mure project, trucks and light vehicles accounted for 41% of the transport energy consumption in Greece in 2023, followed by cars with a share of 37%, maritime transport with 11%, domestic air with 5%, buses with 4% and motorcycles with about 2%.¹² b)To the extent that it is being discussed in the public sphere, the postponement of the application of ETS II is viewed positively, given the fact that according to the data of EEA around 19% of the households in Greece experience energy poverty.¹³ Furthermore, in accordance with another Study, which was conducted by the Think Tank “Green Tank” , 26,5% of the population was found

¹⁰ Green Tank, Trends in the Emissions in the European Union and Greece, 2005-2024, available at: https://thegreentank.gr/wp-content/uploads/2025/07/202507_TheGreenTank_EUETS_Report_2024_EL.pdf

¹¹ International Energy Agency, Country Profile Greece, Efficiency and Demand, available at: <https://www.iea.org/countries/greece/efficiency-demand>.

¹² Odyssey-Mure, Greece-Energy Profile, Energy Efficiency trends and policies, available at: <https://www.odyssee-mure.eu/publications/efficiency-trends-policies-profiles/greece.html> (accessed on 28.4.2026).

¹³ <https://www.eea.europa.eu/en/europe-environment-2025/countries/greece/energy-poverty>.

to be energy vulnerable and 13,09% was found to be transport vulnerable. Therefore, the new system is expected to increase spending by vulnerable households.¹⁴ c) No national regulatory regime which anticipates elements of ETSII and covers buildings and road transport is adopted. d) According to the revised NECP, reduction of emissions in the transport sector constitutes a policy priority towards achieving the objective of climate neutrality, because the transport sector constitutes the second biggest source of greenhouse gas emissions in Greece and moreover was the only sector in which greenhouse gas emissions compared to 1990 levels increased (a 13% increase between 1990 and 2021). In addition to this, 85% of the emissions in the transport sector are attributed to road transport.¹⁵ Therefore, the revised NECL sets a target for the gradual decarbonization of the transport sector which has to be achieved by 2030. The proposed measures for the achievement of the target concerned the increased use of biofuels in road and air transport and the electrification of road and air transport.¹⁶ In addition to this, the revised NECP sets additional targets for emission reduction from new passenger cars and light commercial vehicles that can be achieved through the electrification.¹⁷ It is worth noting that a Law was recently approved by the Parliament (Law 5290/2026) that aims, among others, to contribute to the modernization of the transport sector and to promote the electrification and the emission reduction in the transport sector. The Law reinforced and revised the mandatory requirement which was set in National Climate Law, according to which from 1.1.2026 all new public use passenger cars (taxi) in the Regions of Attica and Thessaloniki with the exception of the island municipalities have to be vehicles of zero emissions (electric) (article 67 of the Law 5290/2026 that modified Article 12 (1) and (2) of Law 4936/2022). The respective provision also sets deviations from the aforementioned requirement, while its fulfillment is associated with the implementation of a programme that will subsidize the purchase of electric taxis.¹⁸ Furthermore, specific emphasis is placed on the development of the necessary infrastructure for electric vehicles. It is though worth noting that Greece falls behind from the EU average concerning the registration of new battery-electric cars, as the share of new electric cars was 6,17% in 2025 in relation to the average share in EU-27 that was 17,4%.¹⁹

With regard to the decarbonization of the building sector, NECP repeats the objectives of the Directive 2024/1275 on the energy performance of buildings, which has not yet been transformed into the national legal order. Subsequently, the central objective of the zero emission footprint of the building sector is set, which must be achieved by 2050. Furthermore, NECP set the interim objective for the renovation of buildings by 2030 as well as objectives for the reduction of the primary energy use in the residential

¹⁴ Facets/ The Green Tank, Policy Proposals and Measures to address the impact of the application of ETS II in Greece, July 2025, available at: [ETS2-impact-report_Facets_Green_Tank.pdf](#).

¹⁵ Chapter 2.2.3 p. 72224 of the revised NECP, *supra*, note 7.

¹⁶ Chapter 2.2.3 p. 72224 of the revised NECP, *supra*, note 7.

¹⁷ Chapter 2.2.3 p. 72228-74234 of the revised NECP, *supra*, note 7

¹⁸ It is worth noting that the taxi owner's association opposed strongly the mandatory requirement for the acquirement of electric vehicles and therefore launched extensive strikes before the approval of the Law by the Parliament. The Association unsuccessfully requested the postponement of the application of the aforementioned requirement to 2035. See Greek Reporter, Athens Taxi Drivers Strike Over Zero-Emission Vehicles, 17 February 2026, available at: <https://greekreporter.com/2026/02/17/athens-taxi-drivers-strike-over-zero-emission-vehicles/>.

¹⁹ Acea, New car registrations: +1.8% in 2025; battery-electric 17.4% market share, 27.1.2026, available at: <https://www.acea.auto/pc-registrations/new-car-registrations-1-8-in-2025-battery-electric-17-4-market-share/>.

buildings.²⁰ In this context, it is worth referring that “Exsoikonomo” (Savings at home) programme is Greece’s flagship residential energy renovation scheme. The programme was initially launched in 2013 and the new programme «Exoikonomo-Autonomo» was launched in December 2020. The programme encompasses interest free loans, high subsidy rates and streamlined processes with the aim to promote energy saving, to upgrade Greek building stock and to prioritize vulnerable households.²¹ The programme has been financed through EU Structural Funds, national resources, and more recently under the National Recovery and Resilience Plan “Ellada 2.0” and has included in all its versions a component to address energy poverty. In addition to this, the energy efficiency requirements of the building code have been strengthened and the Electra Programme is introduced. The latter aims to improve the energy efficiency of the public buildings. The Climate Law also includes a ban on the installation of oil boilers in residential buildings from 2025 onward (article 17 (1)). From a comprehensive perspective, it can be argued that in spite of the notable contribution of flagship Initiatives, such as the “Exoikonomo” Programme to the decarbonization of the building stock, further efforts need to be made. In particular, the programme has to be expanded to meet the high demand, to shift its focus also on deep renovations and to further prioritize low income households by providing appropriate financial and technical support, so that these households can take full advantage of the programme.²²

5. Double regulation?

Is there a discussion about the topic of 'double' regulation: e.g. energy efficiency in ETS installations/build environment, National taxes on/pricing of CO₂ emissions, Emission Limit Values in environmental permits?

To my knowledge, there is no discussion on double regulation, given the fact that the country strives to implement the existing requirements. It is worth referring that Article 19 of National Climate Law (Law 4936/2022) sets an obligation for the industrial activities and other installations, such as tourism installations and urban development projects, sports and leisure, aquaculture and poultry and livestock facilities that do fall into the scope of ETSI, to reduce their greenhouse gas emissions by 2030 by at least 30% compared to 2019’ emissions levels. By 1.1.2026 operators of the installations that fall into the scope of application of the provision must submit a baseline report to the competent licensing authority, in which it is outlined how the emission reductions will be achieved. This report serves as the amendment dossier of the respective environmental permit. Furthermore, it is foreseen that the operator must submit to the competent licensing authority a report regarding the emissions of previous year by 31/10 of each year. Article 19 of Law 4936/2022 also provides for subsequent annual monitoring reports, whereas reduction targets can be met through the purchase of green certificates (Guarantees of Origin), or through the participation

²⁰ Chapter 2.5.2, p. 74272-72274 of the revised NECP, *supra*, note 7.

²¹ Subsidy (Programme “Exsoikonomo- Autonomo”), Available at: <https://clean-energyislands.ec.europa.eu/countries/greece/legal/res-heating-and-cooling/subsidy-programme-exsoikonomoautonomo>.

²² M. Iatridis/A.Giakoumi/D.Mezartasoglou, Energy Efficiency Trends and Policies in Greece, November, 2024, p. 30. The report was developed in the framework of Odyssey-Mure project.

in voluntary national carbon markets, such as reforestation and afforestation programs.

The specific terms and conditions for the application of the abovementioned provision of the National Climate Law are set forth in the recent Ministerial Decision No. 135261/2213/2025 which was issued pursuant to article 33 para. 10 of Law 4936/2022. The decision defines the base year and the unit of product or project for the accurate assessment of greenhouse gas emissions per type of project and activity.

6. Effort Sharing

Is the Member State “on track” to meet its national reduction targets under the Effort Sharing Regulation 2018/842? Is failure / compliance / over-achievement of the EU requirements expected? What are the main challenges or success factors influencing compliance or non-compliance with the EU requirements? Does the state intend to sell its own emission credits or to purchase such credits from other Member States?

PAG

According to the latest EEA data, published in November 2025, Greece seems to be on track to meet its national reduction targets under the Effort Sharing Regulation 2018/842, as it may be seen in the following table²³:



²³ According to the EEA “[t]he figure compares countries Effort Sharing (ES) emission targets with 2030 Effort Sharing Regulation (ESR) projected emission levels. Projected emissions are displayed both as With Existing Measures (WEM) and With Additional policies and Measures (WAM)”. EEA, Interactive Chart, Projected

According to the above table, Greece's target is a -23% reduction by 2030²⁴, while both With-Existing-Measures (WEM) and With-Additional-policies-and-Measures (WAM) projected emissions currently come up to -43%. Based on the above table, not only compliance, but also over-achievement of the EU requirements is expected.

In this context, the EEA report "Trends and projections in Europe 2024" also states that "[l]ooking ahead to 2030, all Member States except Greece and Portugal project that they will have higher ESR emissions than their national reduction targets".²⁵ According to the EU Commission's Climate Progress Report for Greece "[l]atest GHG projections submitted by Greece under the existing measures scenario (WEM) point to a 43% decrease in ESR emissions by 2030 compared to 2005 levels, broadly in line with the ESR emission reduction target by 21 percentage points".²⁶

PAG
Γ

As success factors for the achievement of the emission reductions required by the Effort Sharing Regulation could be considered the lignite phase-out, the exoikomono programme ("saving at home") that finances building renovations and the allocation of 38% of the country's RRF funds specifically to initiatives dealing with climate action.²⁷ As main challenges are regarded, the further decarbonization of transport sector, as the domestic transport sector is the greatest contributor of emissions among the sectors included in the effort sharing regulation, as it accounted for 38 % of all effort sharing emissions in 2022.²⁸ Furthermore, the reduction of the emissions arising from agriculture is also necessary, which also requires structural changes in farming practices.

7. Renewable Energy

What progress has been made in the transition towards a national energy supply based on renewable energy? What is the current energy mix, and what are the projections up to 2050? What differences exist in the transformation of the electricity market versus the broader energy market (including non electric heating, transport and other energy use)? What are the major national regulatory instruments to support the transition to renewables? What major obstacles hinder a faster transition to renewable energy at the

Emissions in the effort sharing sectors in 2030 compared to Member States' national targets, available at: <https://www.eea.europa.eu/en/analysis/publications/trends-and-projections-in-europe-2025/projected-emissions-in-the-effort>.

²⁴ More accurately, according to EU Commission, the country's target comes up to -22,7%, available at https://climate.ec.europa.eu/eu-action/effort-sharing-member-states-emission-targets/effort-sharing-2021-2030-targets-and-flexibilities_en.

²⁵ European Environmental Agency, EEA Report 11/2024, Trends and Projection in Europe 2024, p. 38, available at: <https://www.eea.europa.eu/en/analysis/publications/trends-and-projections-in-europe-2024>.

²⁶ EU Commission (2026), Climate Action Progress Report 2025 GREECE, p.10, available at https://climate.ec.europa.eu/document/download/7d086f35-bad7-4beb-b559-126b381e9ac_en?filename=el_2025_factsheet_en.pdf.

²⁷ Information on this issue is available at: https://reforms-investments.ec.europa.eu/recovery-and-resilience-facility-1/country-pages/greeces-recovery-and-resilience-plan_en.

²⁸ European Commission (2025), Commission Staff Working Document, 2025 Environmental Implementation Review Country Report - GREECE, SWD(2025) 311 final, p. 39, available at [https://ec.europa.eu/transparency/documents-register/detail?ref=SWD\(2025\)311&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2025)311&lang=en).
<https://www.energean.com/operations/greece/prinos-co2/>

national level? Are adjustments to the EU's regulatory framework considered necessary? If so, which ones?

The Greek National Energy and Climate Plan (NECP), which was revised in 2024, sets for renewable energy sources a goal of 43.0% of gross final energy consumption to be reached by 2030, and a goal of 95,8% to be reached by 2050²⁹. The following table of the NECP³⁰ demonstrates the goals set by the Greek authorities relating to the transition towards a national energy supply based on renewable energy sources.

Table 6 Summary of results for RES target indicators.

	2025	2026	2027	2028	2029	2030	2035	2040	2045	2050
Share of RES in gross final energy allocation [%]	30.9 %	34.1 %	36.3 %	38.9 %	41.4 %	43.0 %	60.6 %	77.2 %	88.6 %	95.8 %
Share of RES in gross electricity consumption [%]	58.6 %	64.5 %	67.8 %	71.8 %	75.3 %	75.7 %	96.2 %	102.8 %	106.9 %	100.8 %
Share of RES in gross final energy allocation for heating and cooling [%]	39.8 %	43.4 %	46.2 %	49.7 %	52.1 %	52.6 %	60.6 %	75.2 %	81.6 %	84.1 %
Share of RES in final energy consumption of the building sector [%]	51.2 %	55.5 %	59.7 %	63.1 %	65.7 %	72.2 %	86.0 %	93.3 %	95.3 %	95.1 %
Share of RES for energy and non-energy purposes in industry [%]	19.7 %	22.0 %	25.1 %	29.7 %	31.9 %	34.0 %	43.0 %	57.3 %	60.6 %	65.8 %
Share of RES in final energy consumption of the transport sector (%)	4.4 %	5.0 %	5.9 %	7.1 %	9.5 %	13.4 %	19.5 %	25.2 %	30.2 %	37.4 %
Share of advanced biofuels and bio-fuels in the transport sector (%)	0.8 %	1.2 %	1.5 %	1.8 %	2.9 %	4.6 %	7.6 %	8.7 %	9.9 %	10.5 %
Share of renewable fuels of non-biological origin in the transport sector (%)	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.9 %	1.6 %	2.3 %	3.0 %	3.6 %
Share of advanced biofuel – biogas and renewable fuels of non-biological origin in the transport sector (%)	0.8 %	1.2 %	1.5 %	1.8 %	2.9 %	5.5 %	9.1 %	11.0 %	12.9 %	14.1 %
SAF (Sustainable Aviation Fuel) of biological origin	1.8 %	2.4 %	3.0 %	3.7 %	4.3 %	5.0 %	9.4 %	11.1 %	12.8 %	14.5 %
SAF (Sustainable Aviation Fuel) of non-biological origin	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	1.0 %	1.0 %	1.2 %	1.3 %	1.5 %

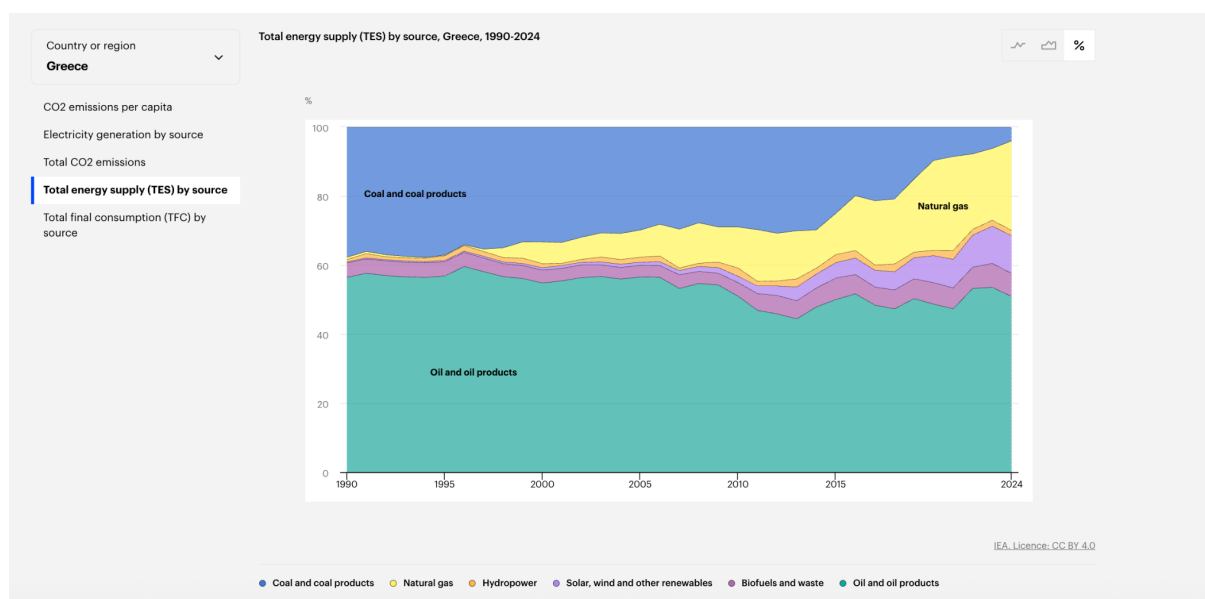
PAG
Γ

The following table elaborated by the International Energy Agency, presents the total energy supply by source throughout the years from 1990 to 2024³¹:

²⁹ Chapter 2.3.1, p. 74243 of the revised NECP, *supra*, note 7.

³⁰ The table can be found at p. 122 of the rough translation of the NECP available at https://commission.europa.eu/publications/greece-final-updated-necp-2021-2030-submitted-2025_en?prefLang=el.

³¹ The table can be found at <https://www.iea.org/data-and-statistics>.

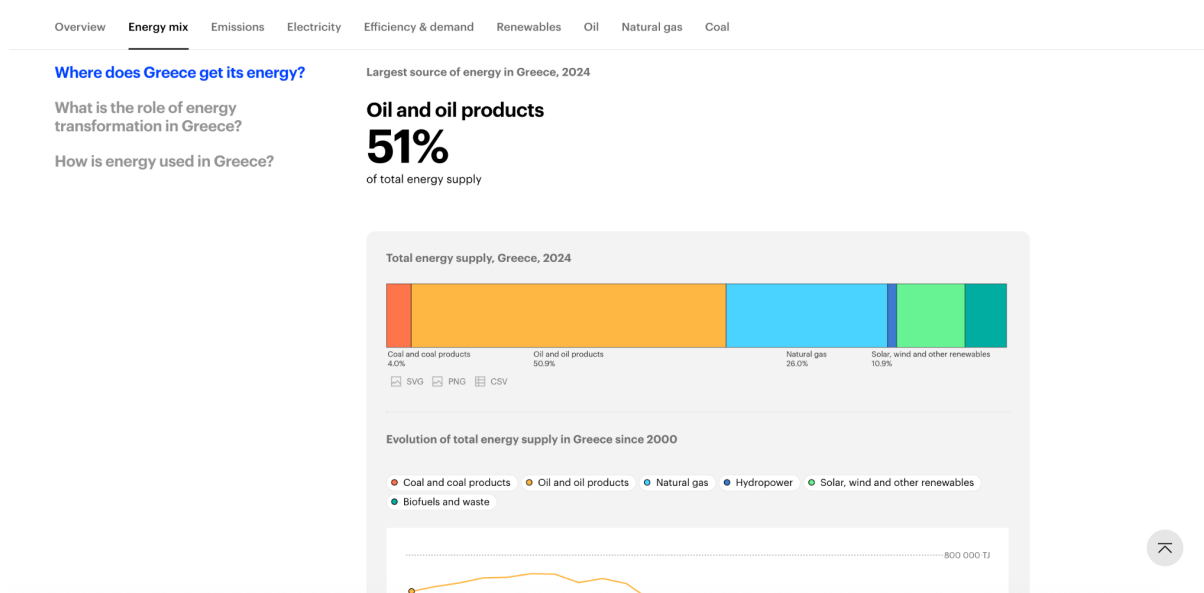


According to the European Environment Agency, Greece has made significant progress in the production and use of energy produced by renewable sources, with wind and solar power driving this transition. 2023 was a record year in Greece's clean energy production, with 57% of the energy mix being supplied by RESs (wind and solar) and hydroelectric units, surpassing 25 TWh. In 2023, the annual production of green energy reached a decade-high, touching 21.35 TWh and marking a 147% increase compared with the annual RES electricity production in 2014 (8.64 TWh). The highest monthly production from RESs in the history of the electrical system occurred in August 2023, reaching 2.25 TWh.³²

It can be, though, easily understood both from the upper table as well as from the latest IEA country energy snapshot for Greece³³, that is presented below that the broader energy mix remains fossil-fuel dependent. In accordance with the latter, the overall energy mix is dominated by oil and oil products (50.9%) as well as natural gas (26.0%), while solar, wind and other renewables account for 10.9% and hydropower 1.5%. This is consistent with the structure of final energy demand, where transport, buildings and parts of industry still rely heavily on liquid fuels and gas and the transition in those sectors is much more cost-effective and therefore presupposes significant investments.

³² EEA (2025), Share of renewable energy in final energy consumption, available at <https://www.eea.europa.eu/en/europe-environment-2025/countries/greece/renewable-energy-sources>.

³³ The table can be found at <https://www.iea.org/countries/greece/energy-mix>.



It is also worth noting that NECP projects 52.6% renewables in heating and cooling by 2030³⁴, but only 13.4% renewables in transport by 2030³⁵.

The major national planning and regulatory instruments, which set the framework for the transition to renewables are the following: **1.** NECP, which outlines how Greece will contribute to achieving the intermediate European climate target of a 55% reduction in GHG emissions by 2030 and ultimately the climate neutrality target by 2050. **2.** The National Climate Law (Law 4936/2022) which sets the overarching framework for climate neutrality and sectoral transition **3.** Law 4951/2022 that reformed and accelerated RES licensing and established a framework for electricity storage **4.** Law 4964/2022 which set the regulatory framework for the deployment and the authorization of offshore wind. It is also worth noting that very recently Law 5299/2026 has been adopted which transposes RED III Directive into the national legal order.

The main obstacles to a faster national transition towards renewables are no longer resource potential, but system integration and implementation bottlenecks. The most important barriers could be considered the following: the limited grid capacity and congestion, especially for new RES connections, the insufficient storage and flexibility³⁶, the long and still complex permitting and spatial-planning procedures, which are expected to be addressed by the implementation of the Law 5299/2026, the limited acceptance of RES projects by the local communities and the slower electrification of transport and buildings.

³⁴ Chapter 2.3.1, p. 74244 of the revised NECP, *supra*, note 7.

³⁵ Chapter 2.3.1, p. 74243 of the revised NECP, *supra*, note 7.

³⁶ See Independent Power Transmission Operator's (ADMHE in Greek) Ten-year Network Development Plan 2024-2033, pp. 26-28 available at: https://www.admic.gr/sites/default/files/2023-10/%CE%94%CE%A0%CE%91_2024-2033_%CE%9A%CF%8D%CF%81%CE%B9%CE%BF_%CE%A4%CE%B5%CF%8D%CF%87%CE%BF%CF%82.pdf; Institute of Energy for South-East Europe, Annual Report of 2024, The Greek energy sector, available at https://www.iene.gr/articlefiles/docs/IENE_MELETI_2024_web.pdf, pp. 59-62.

According to NECP, Greece expects battery storage capacity to reach 4.3 GW by 2030³⁷ and pumped storage 1.9 GW by 2030³⁸. The NECP suggests that offshore wind will become much more important after 2030, with its contribution to net electricity production projected to rise from 1% in 2030 to 32% in 2050³⁹. At the same time, the plan assumes deeper electrification of buildings, wider heat-pump use, more renewable fuels for hard-to-abate sectors, and a large decline in gas consumption from 51.2 TWh in 2022 to 42,5 TWh by 2030 and finally to 16.1 TWh by 2050⁴⁰.

8. Land Use

How exactly are emissions from the land-use sector recorded nationally? What trends can be derived from this data? What strategies are being pursued at the national level to strengthen the land-use sector's contribution to emission reductions and to comply with the LULUCF-Regulation 2018/841?

PAG
Γ

In order to comply with the decision 18/CMA.1 of the UNFCCC Secretariat⁴¹, which sets Parties' obligation to submit their GHG inventory covering emissions from five sectors (energy, industrial processes and product use, agriculture, land use, land-use change and forestry (LULUCF) and waste), the Greek Ministry of Environment and Energy (MEEN), assisted by the National Technical University of Athens, conducted the National Inventory Report of Greece for Greenhouse and Other Gases for the years 1990-2023, dated April 2025. According to the later, the land use, land-use change and forestry sector was a net sink of greenhouse gases during the period 1990-2023; the sink capacity of the LULUCF sector fluctuates between -2 Mt CO₂ eq. and -5.18 Mt CO₂ eq., showing fluctuations in trend, which is the result of the increase of the sink capacity of the Forest Land, Grassland and Cropland category⁴². Chapter 6 of the report, "*Land Use, Land Use Change and Forestry (CRT sector 4)*" contains many technical details relating to this topic.

According to the 2025 Environmental Implementation Review for Greece of the EU Commission⁴³, Greece's LULUCF sector has had approximately constant net removals since 2015, while Greece's target in 2030 is to enhance land removals by additional -1.2 Mt of CO₂ equivalent compared to the yearly average of the period 2016-2018. The latest available projections show a gap to the 2030 target of -1.2 Mt of CO₂ equivalent. Therefore, Greece is on track to meet this target.

9. Special National Strategies, Programmes, and Ideas

What special strategies, regulatory programmes, and ideas—beyond those already mentioned—are being pursued nationally for climate mitigation? How do these

³⁷ Chapter 2.3.7, p. 74251 of the revised NECP, *supra*, note 7.

³⁸ Chapter 2.3.8, p. 74253 of the revised NECP, *supra*, note 7.

³⁹ Chapter 3.2.9, p. 74411 of the revised NECP, *supra*, note 7.

⁴⁰ Chapter 2.4.1, p. 74256 of the revised NECP, *supra*, note 7.

⁴¹ Available at <https://unfccc.int/resource/tet/0/00mpg.pdf>

⁴² Climate Change Emissions Inventory (2025), Hellenic Republic Ministry of Environment and Energy, p.viii, available at https://ypen.gov.gr/wp-content/uploads/2025/04/2025_NIR_Greece.pdf.

⁴³ European Commission (2025), Commission Staff Working Document, 2025 Environmental Implementation Review Country Report - GREECE, SWD(2025), *supra*, note 27, p. 39.

national concepts and legal instruments relate to EU climate policy? Does a programme for carbon capture and storage exist?

In December 2025 Law 5261/2025 was enacted that establishes a comprehensive legal framework for the capture, use, transport and storage of CO₂ in Greece and by which the EU Directive 2009/31 has been transposed into the national legal order.

The most significant (and the only one) project of CO₂ storage to date in Greece is “Prinos” for which an environmental permit was issued in November 2025. Prinos is situated in the island of Thasos. Following the issuance of the environmental permit and after the positive assessment of the European Commission, the Hellenic Hydrocarbons and Energy Resources Management Company (HEREMA) issued an authorization that certifies the suitability of the respective offshore formation for permanent CO₂ storage at a depth of approximately 3 kilometers below seabed and for a twenty five year period.⁴⁴ It is worth noting that the municipality of Thasos and 50 associations of the broader area have challenged the environmental permit before the Council of State and the case is pending. The main arguments that are claimed by the participants concern the effects of the project on the coastal and fragile ecosystems, the impact on water resources as well as the seismic activity of the region.⁴⁵

PAG
Γ

In addition, article 21 of the National Climate Law (Law 4936/2022) has introduced the “GR-eco islands” initiative, which constitutes a flagship national strategy that aims to set the roadmap for the transformation of the development model of the Greek islands and for facilitating their road to climate neutrality. The implementation of this regulatory framework is already underway through several pilot projects in greek islands (Astypalaia⁴⁶, Chalki⁴⁷, Tilos⁴⁸, Kythnos⁴⁹ and Poros⁵⁰). Each pilot project focuses on different pillars of decarbonization.

10. Social and Regional Compensation Mechanisms

Are there national mechanisms to provide social or regional compensation for the burdens arising from climate protection measures? Is any form of “climate dividend” or “climate payment” being issued?

Within the framework of the Implementation of the specific components of the Just Transition mechanism, Greece adopted the Just Transition Development Programme 2021-2027, with a total budget of 1,63 billion euros, co-financed by the Just Transition Fund (JTF) and implemented under the Cohesion Policy.⁵¹ The JTD Programme in

⁴⁴For further information see <https://www.energean.com/operations/greece/prinos-co2/>.

⁴⁵ D. Karatziou, Prinos CO₂: A necessary green investment or a high risk activity? Lifo, 28.3.2026 (in Greek), available at: <https://www.lifo.gr/stiles/optiki-gonia/prinos-co2-anagkaia-prasini-ependysi-i-ergo-ypsilo-riskoy>.

⁴⁶ Information on the project available at <https://www.astypalea-sustainable-island.gr/about-the-project/>.

⁴⁷ Few information on the project available at <https://ypen.gov.gr/i-chalki-ginetai-to-pto-gr-eco-island/> and <https://k2southaegian.gr/gr-eco-island-chalki/>.

⁴⁸ The project is called S4Tilos, information available at <https://clean-energy-islands.ec.europa.eu/countries/greece/tilos>.

⁴⁹ Information available at <https://dafninetwerk.gr/en/>.

⁵⁰ Information available at <https://ypen.gov.gr/symfonia-elladas-masdar-ton-iae-gia-ton-metastichatismo-tou-porou-sto-epomeno-gr-eco-island/>.

⁵¹ The official site of the Programme, available at <https://eydam.gr/en/programm-dam-2021-2027/>.

force, as approved by virtue of the Commission's decision No C(2022) 3943/16.6.2022, focuses on supporting specific areas of the country affected by the withdrawal of lignite activity and the phasing out of inefficient and highly polluting autonomous power stations using fuel oil and diesel. The program⁵² has set the following six priorities: 1. Strengthening and promoting business by enhancing the competitiveness and digital transformation of existing businesses, linking RTDI (Research, Technological Development and Innovation) to production and promoting start-ups. 2. Enabling energy transition and the achievement of the objective of climate neutrality, by improving the energy efficiency of the building stock and access to affordable clean energy systems and infrastructure, including its storage technologies. 3. Enabling land-use adjustment through regeneration and re-use of degraded land and facilities, developing green infrastructure and promoting circular economy. 4. Promoting the just transition in the labor market and the strengthening of human capital, through upskilling and reskilling actions of workforce, investments in infrastructure for the purposes of education, training and facilitating labour market integration. 5. Promoting comprehensive small-scale interventions, covering measures to improve the quality of life of residents and the diversification of local economies and 6. Providing technical support that covers the necessary expenses (procurement of goods and services, support for beneficiaries, etc.).

In line with the above-mentioned national JTD Programme, three specific Territorial Just Transition Plans (TJTJs) have been adopted, covering Megalopolis⁵³, Western Macedonia⁵⁴ and North and South Aegean Islands and Crete.⁵⁵

In the case of the TJTJ of Megalopolis (Peloponnese), the necessity of its adoption stems from the fact that Megalopolis constitutes a distinct "energy basin" with unique local characteristics. Therefore, the plan focuses on the rehabilitation of mines and the creation of new low-carbon jobs in an area with a significant carbon footprint so far. In the case of the TJTJ of Western Macedonia, it is indisputable that the region depended

⁵² The JTM Programme as approved by the EU Commission is available at:

<https://www.sdam.gr/sites/default/files/2022-06/%CE%A0%CE%A1%CE%9F%CE%93%CE%A1%CE%91%CE%9C%CE%9C%CE%91%20%CE%94%CE%99%CE%9A%CE%91%CE%99%CE%97%CE%A3%20%CE%91%CE%9D%CE%91%CE%A0%CE%A4%CE%A5%CE%9E%CE%99%CE%91%CE%9A%CE%97%CE%A3%20%CE%9C%CE%95%CE%A4%CE%91%CE%92%CE%91%CE%A3%CE%97%CE%A3.pdf>

⁵³ Territorial Just Transition Plan for Megalopolis (Peloponnese), available at:

<https://www.sdam.gr/sites/default/files/2022-06/%CE%95%CE%94%CE%91%CE%A6%CE%99%CE%9A%CE%9F%20%CE%A3%CE%A7%CE%95%CE%94%CE%99%CE%9F%20%CE%9C%CE%95%CE%93%CE%91%CE%9B%CE%9F%CE%A0%CE%9F%CE%9B%CE%97%CE%A3.pdf>

⁵⁴ Territorial Just Transition Plan for Western Macedonia, available at:

<https://www.sdam.gr/sites/default/files/2022-06/%CE%95%CE%94%CE%91%CE%A6%CE%99%CE%9A%CE%9F%20%CE%A3%CE%A7%CE%95%CE%94%CE%99%CE%9F%20%CE%9C%CE%91%CE%9A%CE%95%CE%94%CE%9F%CE%9D%CE%99%CE%91%CE%A3.pdf>

⁵⁵ Territorial Just for North and South Aegean Islands, available at:

<https://www.sdam.gr/sites/default/files/2022-06/%CE%95%CE%94%CE%91%CE%A6%CE%99%CE%9A%CE%9F%20%CE%A3%CE%A7%CE%95%CE%94%CE%99%CE%9F%20%CE%9C%CE%91%CE%9A%CE%95%CE%94%CE%9F%CE%9D%CE%99%CE%91%CE%A3.pdf>

almost exclusively on mining of lignite and the operation of lignite-fired power plants. Subsequently, the just transition in this region presupposes the complete transformation of its economic model and the upskilling and reskilling of the labor force.⁵⁶ Lastly, in the case of the islands, the challenge is not the lignite phase-out, but the decarbonization of the islands' autonomous power systems. Therefore, the respective plan focuses on green energy, electrical interconnection and the blue economy, addressing the needs of three different island regions.

Law 5294/2026, which is recently adopted, sets the necessary institutional arrangements for the implementation of Regulation 2023/955 on Social Climate Fund. In this context, a Special Agency for the Social Climate Fund and the Modernization Fund is established under the Minister of Economy and Finance. The newly established agency is tasked with monitoring and coordination of the implementation of programs and projects to be funded by the Social Climate Fund and the Modernization Fund. The new law also provides for the establishment of four separate multi-member bodies within it, each with distinct administrative responsibilities: a) the Social Climate Fund Coordination Authority, b) the Modernization Fund Coordination Directorate, c) the Administrative Support Unit, and d) the Independent Legal Support Department.

11. Adaptation

Are there national programmes for climate adaptation? How can these be briefly described? Should the EU, from a national perspective, develop climate adaptation programmes, or should this remain the responsibility of the Member States?

a) According to article 5 of the National Climate Law (Law 4936/2022), the National Strategy for Adaptation to Climate Change is approved by a decision of the Council of Ministers that is published in the Government Gazette and covers a period of at least 10 years. It is also foreseen that the Strategy must be reviewed every 5 years. The first National Strategy for Adaptation to Climate Change was issued pursuant Article 42 of Law 4414/2016 and covered the years 2016-2025.⁵⁷ The National Strategy sets the following goals:

- The improvement of the decision-making processes through the acquisition of more comprehensive information and scientific data related to adaptation;
- The adoption and implementation of regional adaptation action plans in alignment with the strategy;
- The promotion of adaptation actions and policies across all sectors, with an emphasis on the sectors that are most vulnerable to the impacts of climate change.

⁵⁶ For a very brief review of the progress related to the just transition developments of Greece and especially the delays and obstacles, see N. Mantzaris (2026), Decarbonization without a just transition, Oiko-enimerosi, available at <https://thegreentank.gr/2026/02/03/nm-oikologiki-enimerosi-el/>.

⁵⁷ The National Strategy for Adaptation to Climate Change is available at https://ypen.gov.gr/wp-content/uploads/legacy/Files/Klimatiki%20Allagi/Prosarmogi/20160406_ESPKA_teliko.pdf.

- The establishment of a monitoring and evaluation mechanism for the actions and policies aiming at promoting adaptation
- The increasing of public awareness with regard to the issue of adaptation.

Furthermore, article 6 of the National Climate Law (Law 4936/2022),⁵⁸ stipulates the obligation of each Region to prepare and adopt a Regional Plan for Adaptation to Climate Change. The regional plans for adaptation to climate change must be in line with the provisions of the National Strategy and are subject to Strategic Environmental Impact Assessment. Most of the regions have adopted regional plans for adaptation to climate change

To my knowledge, it remains unclear if the country is currently in the process of updating its relevant national strategy.

Article 25 of the National Climate Law also provides for the establishment of the National Observatory on Climate Change Adaptation, which constitutes an open network for the exchange of information and communication involving the Ministries of Climate Crisis and Civil Protection, Environment and Energy, the Interior, the National Meteorological Service, the National Observatory of Athens, and other research, academic, and public institutions. Furthermore, Article 28 of the National Climate Law sets out the establishment of the National Council of Adaptation to Climate Change, which constitutes the central consultative body of the State with regard to the coordination, the monitoring and the adoption of policies that deal with the adaptation to climate change in the various sectors.

b) Given the fact that national and regional adaptation programmes should be designed in a manner that reflects the national and regional particularities, the development and the content of the respective programmes should, in my opinion, remain in the responsibility of the MS. The Greek experience regarding the adoption of the national and regional adaptation plans in the sense that to my knowledge there is no foreseeable perspective for the revision of the national adaptation strategy and that the regional adaptation plans have been adopted with significant delay, demonstrates that some form of intervention by the EU legislator is necessary. The respective intervention should concern the timeframes in which national and regional plans should be adopted and revised, the minimum content that they should contain as well as minimum publication participation requirements that have to be applied in their adoption and revision.

12. New liability/compensation regime in the Air Quality Directive (2024/2881) and the amended IE Directive (2024/1784)

The new Air Quality Directive 2024/2881, art. 28. and the amended IE Directive (2024/1785) requires Member States to establish a liability/compensation regime regarding persons suffering damage to human health caused by violation of the EU-obligations under the two directives. The new EU-obligation should be seen in light of the CJEU-ruling in C-61/21 in which the CJEU rejected Member State liability for human health damage based on the (old) Air Quality Directive. The new obligations place Member States as the one who should pay compensation for the damage, but the legal implications of the new regimes are not entirely clear. How is the new obligation

⁵⁸ A similar obligation was set in Article 43 of the Law 4414/2016.

on liability/compensation in the new Air Quality Directive and the amended IE Directive intended to be implemented in your Member State?

To my knowledge there is no public discussion concerning how the respective compensation clauses which are set in the Air Quality Directive and in the revised Industrial Emissions Directive, will be transposed into the national legal order.