26 March 2026

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the seventh payment request submitted by Greece on 19 December 2025, 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 19 December 2025, Greece submitted a request for payment for the seventh instalment of the non-repayable support and the sixth instalment of the loan support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Greece provided due justification of the satisfactory fulfilment of the 22 milestones and targets of the seventh instalment of the non-repayable support and the four milestones and targets of the sixth instalment of the loan support, as set out in Section 2(1)(7) and Section 2(2)(6)[1] on the approval of the assessment of the recovery and resilience plan for Greece.

For three 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 request, Greece has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary. Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Greece, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 26 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Greece's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, the interconnection and interoperability of registries, systems and services for data exchange between national public organisations, strengthening the apprenticeship system, the organisational reform in the railways sector, the reform of passive labour market policies supporting transition to employment, setting up the legal framework governing the carbon capture, usage and storage, simplification of the procedures of the Ministry of Infrastructure and Transport. The milestones and targets also confirm progress towards the completion of investment projects related to the renovation of primary healthcare units and hospitals, the modernisation of one-stop-shops, the digital transformation of the Tax and Customs Administration, access to finance in Greece's housing sector and supporting private investments.

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

[1] ST 10152 2021 INIT and ST 10152 2021 ADD 1, as amended by 15831/1/23 REV 1 and 15831/23 ADD 1 REV 1, by ST 17055 2024 INIT and ST 17055 2024 ADD 1 COR 1, by ST 11101/25 and ST 11101/25 ADD 1, and by ST 15754/25 and ST 15754/25 ADD 1 .

Contents

Non-repayable support

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 51 Carbon Capture and Storage (CCS) – storage permission

Related Measure: 1,3.16831_Produc-E Green

Qualitative Indicator: Issuance of the storage permit and establishment of a reporting system.

Time: Q4 2024

1. Context:

The objective of this measure is to contribute to the low carbon economy and enhance resilience to climate change. This measure consists in the development of industrial units for the green transition and the establishment of the first CO2 storage facility in Greece.

The responsible Ministry shall issue the storage permit for the Carbon Capture and Storage (CCS) facility to the confirmed operator, provided the applicant submits a complete application, including all relevant studies and an Environmental Impact Assessment Study. The facility must maintain an initial CO2 injection rate of one million tonnes per year, with a minimum capacity of 20 years, supported by a binding requirement for an annual reporting system to confirm CO2 storage and ensure any oil extraction is solely for pressure management and safety; any extracted CO2 must be separated and reinjected for permanent storage. Compliance with binding requirements prohibits the facility from employing Enhanced Oil Recovery (EOR) technologies or commercial oil recovery methods, limiting any extraction to indispensable safety needs, ensuring extracted CO2 is returned for permanent storage.

Milestone 51 is the first milestone of the Carbon Capture and Storage sub-investment. It will be followed by milestone 53, related to the delivery of drilling equipment, and certification verifying the drilling of one well. The sub-investment has a final expected date for implementation of Q4/2025.

2. Evidence provided:

	Name of the evidence.	Short description
1	CO2 storage permit, issued by the Hellenic Hydrocarbons and Energy Resources Management Company (hereinafter "HEREMA") (Decision number 33191), OJ D' 121/20.02.2026. Based on Article 24, the entry into force is 20 February 2026, the date of publication.	CO2 storage permit

2	Law 5261/2025 on Regulations on the capture, use, transport, and storage of carbon dioxide - Transposition of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC and Directives 2000/60/EC,2001/80/EC, and 2004/35/EC of the European Parliament and of the Council 2000/60/EC, 2001/80/EC, 2004/35/EC, 2006/12/EC, and 2008/1/ EC, and Regulation (EC) No. 1013/2006 (L 140), OJ A' 231/12.12.2025, entry into force on the publication date (12 December 2025) based on the provisions of Article 81.	Article 4 of Law 5261/2025, the Hellenic Hydrocarbons and Energy Resources Management Company (HEREMA) is designated as the competent authority for the implementation of the CCS framework
3	Law 4964/2022 on provisions for simplifying environmental permitting, establishing a framework for the development of offshore wind farms, addressing the energy crisis, protecting the environment, and other provisions, OJ A' 150/30.07.2022, entry into force on 30 July 2022 based on the provisions of Article 201.	Article 173 regulates the application procedure for a CO_2 storage permit.
4	Exploration permit issued by HEREMA, Protocol Number: ΕΔΕΥΕΠ 14577; OJ B' 5247/2022	The exploration permit to the project promoter activated the right to apply for carbon storage in the field under Article 173 of Law 4964/2022
5	Storage permit application to HEREMA by ENERGEAN SA under protocol number ΕΔΕΥΕΠ/22781/01-07-2024 and Annexes I-VIII	Annex I: Prinos CO_2 Storage Site Suitability Report Annex II: Monitoring, Measurement, and Verification (MMV) Plan Annex III: Prinos Post Closure Plan Annex IV: Corrective Measures Plan Annex V: Permit Requirements and Special Conditions for CO_2 Well Operations at Prinos

		Annex VI: Parent Company Guarantee Annex VII: Confirmation of Insurance Coverage for Uncertain Elements of the Financial Security Annex VIII: Supplementary Documentation on the Financial Security and Financial Capability/Adequacy of the Applicant
6	Environmental Impact Assessment (hereinafter "EIA") (Protocol Number ΥΠΕΝ/ΔΙΠΑ/130047/9051/27-11-2024), and completeness certificate issued by the Ministry of Environment and Energy with Protocol Number ΥΠΕΝ/ΔΙΠΑ/138279/9533/13-12-2024.	
7	Approval of Environmental Terms was issued ΥΠΕΝ/ΔΙΠΑ/97416/6779/07.11.2025 Approval of Environmental Terms ΑΔΑ:Ρ3Ι74653Π8-ΤΙ6).	
8	Amendment of decision of Approval of Environmental Terms ΥΠΕΝ/ΔΙΠΑ/97416/ 6779/07.11.2025 (ΑΔΑ: Ρ3Ι74653Π8- ΤΙ6) under Protocol Number ΥΠΕΝ/ΓΠΔΔ/29723/620/16.03.2026 (ΑΔΑ: 9ΧΠΩ4653Π8-ΚΔ6)	
9	Hellenic Hydrocarbons and Energy Resources Management Company, 'Notification of CO2 storage permit application for the Prinos complex, as per Article 10(1) of Directive 2009/31/EC, Protocol Number 23205/25.07.2024	Notification of the storage permit to DG CLIMA
10	Commission Opinion of 28.01.2026 on the draft permit to permanently store carbon dioxide in the Prinos field located on the Greek continental shelf, C(2026) 410 final/ 28.01.2026	Issuance of non-binding opinion of the Commission on the storage permit, as per Article 20 of Directive 2009/31
11	Summary document	Summary document duly justifying how the milestone requirements (including all the constitutive elements, as set out in the description

		of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled

3. Analysis:

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

Issuance of the storage permit by the responsible Ministry for the Carbon Capture and Storage (CCS) to confirmed operator.

The CO2 storage permit was issued by the competent authority, the Hellenic Hydrocarbons and Energy Resources Management Company (hereinafter "HEREMA"), and was published in the Official Journal on 20 February 2026 (evidence 1). By this decision, HEREMA formally authorised EnEarth Greece Single Member S.A. to undertake the operation of the Prinos CO2 storage site under the prescribed technical, environmental, monitoring, financial security and reporting obligations. The issuance of the permit marks the first fully licensed CO2 geological storage project in Greece under the modernised CCS framework and establishes the regulatory foundation for the safe, longterm and permanent sequestration of carbon dioxide within the Prinos storage complex.

The confirmation of the operator was done on the basis of the provisions of Article 173 of Law 4964/2022 (evidence 3). Based on Article 173, the CO2 storage permit is given 'by priority' to the operators holding an exploration permit, on the basis of Law 2289/2022. The exploration permit granted to the project promoter is listed as evidence (4), thus justifying the applicability of Article 173 of Law 4964/2022. Hence, the operator is confirmed through the existence of the exploration permit, and the fulfillment of the criteria of Article 138 of Law 1964/2022.

Following the review of all technical studies submitted, HEREMA drafted the storage permit and sent it for review to the Commission services (DG CLIMA) on 16/04/2025 (evidence 9). Following the submission of the draft storage permit by HEREMA to the European Commission, the Commission completed its assessment, after the examination of all technical, geological, environmental and safety documentation transmitted by the competent authority, including the characterisation of the Prinos storage complex, the preventive and corrective measures, the monitoring programme, and the long-term containment modelling. In its Opinion C(2026) 410 final of 28 January 2026, the Commission confirmed that the application met the requirements of the CCS Directive and its national transposition, and concluded that no additional objections or technical reservations were warranted. The Opinion therefore endorsed the adequacy of the proposed storage site configuration, validated the robustness of the monitoring and risk-management framework, and affirmed that the draft permit ensured a level of environmental and operational safety consistent with Union law (evidence 10). The Council Implementing Decision required the issuance of the storage permit by the responsible Ministry for the Carbon Capture and Storage (CCS) to the confirmed operator. Greece provided the relevant carbon capture and storage permit, issued by HEREMA, the competent authority. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the deviation is acceptable, as it is based on the national legal framework. Specifically, pursuant to Article 4 of Law 5261/2025, the Hellenic Hydrocarbons and Energy Resources Management Company (HEREMA) is designated as the competent authority for the implementation of the CCS framework, including the granting of permits for exploration and storage of CO_2 in geological formations (evidence 2). As of this, this minimal deviation 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 capacity of the carbon capture and storage facility shall initially have a CO2 injection rate of one million tonnes/year and shall provide capacity for, at least, 20 years.

The facility shall initially operate with a CO_2 injection rate of 1 million tonnes per annum (MTPA), in accordance with Article 4 of the Storage Permit (evidence 1). The duration of the storage and injection period, as set out in Article 3 of the storage permit (evidence 1), together with the Injection Strategy presented in Article 13 of the permit (evidence 1), establishes a 20-year injection plan, thereby confirming the designed long-term capacity of the project.

Submission of a complete application to the Ministry of Environment and Energy by the applicant, which would include all relevant studies

The application for a CO2 storage permit, is provided for in Article 173 of Law 4964/2022 (evidence 3).

The application shall include the following:

a) Name and address of the interested party.

b) The contract and any other documents evidencing the holder's right or license to explore for and exploit hydrocarbons in the specific area.

c) A technical report containing the following information: A description of the site, including its volume, which is proposed as a suitable CO2 storage site, and of the surrounding area within a radius of at least one (1) kilometre; Documentation that the proposed site is, in principle, eligible for CO2 storage, based on the data—particularly geological, geophysical, and drilling data—collected by the operator; A timeline for the remaining work required to complete the investigation of the area, in accordance with the criteria and implementation phases set forth in Annex I of Joint Decision No. H.P. 48416/2037/E.103/2011.

(d) Measures for the safety and protection of workers.

The Greek authorities have submitted the Annexes to the application procedure (evidence 5). Annex I includes all information on the corporate structure of the interested party, covering the requirement under (a).

The exploration permit (evidence 4) covers the requirement under (b).

Annex III (evidence 5) comprises of a technical report setting out the suitability of the proposed site and CO2 storage complex and assessing the expected safety of the storage facility, in accordance with the criteria of Annex I of the Joint Decision No HP 48416/2037/E.103/2011.

Annex IV (evidence 5) comprises of a report describing the total quantity of CO_2 to be injected and stored, as well as the intended sources and methods of transport, the composition of the CO_2 streams, the injection rates and pressures, and the location of the injection facilities. Annex V (evidence 5) comprises of a detailed description of the construction works and projects required in the context of the CO_2 storage activity. Annex VI (evidence 5) covers the proposed temporary plan, following the closure of the storage site, pursuant to paragraph 3 of Article 18 of Joint Decision No. 48416/2037/E.103/2011. Annexes III-VI covers point (c) under the legislation above.

Annex II in section 12.4 covers the occupational health and safety concerns, as stipulated in point (d) of the legislation.

as well as an Environmental Impact Assessment Study.

The Environmental Impact Assessment study was submitted by EnEarth to the Directorate of Environmental Permitting of the Ministry of Environment and Energy. The project's Environmental Impact Assessment (EIA) (Protocol Number ΥΠΕΝ/ΔΙΠΑ/130047/9051/27-11-2024), was followed by the ratification of its completeness by the relevant Directorate of the Ministry, through the certificate of completeness (Protocol Number ΥΠΕΝ/ΔΙΠΑ/138279/9533/13-12-2024) (evidence 6).

Establishment of a reporting system for annual reporting on CO_2 stored and confirmation of no oil extracted, other than that limited to the indispensable needs of managing pressure and ensuring safety of the storage sites, and that any process CO_2 associated with the indispensable extraction shall be separated and fed back for permanent storage.

The carbon capture and storage facility shall operate without using any commercial oil extraction or oil recovery activities from the reservoir horizons where CO_2 injection is taking place.

Further, the carbon capture and storage shall also comply with the requirement that there shall be no technological applications, neither any type of facilities and equipment engineered towards Enhanced Oil Recovery (EOR) application and increased oil production. Care shall be taken that any possible extraction of oil or gas shall be limited to the indispensable needs of managing pressure and ensuring safety of the storage sites and that any such extraction shall be done only if indispensable to ensure the safe storage of CO_2. The CO_2 with any oil or gas that may be extracted shall be separated and fed back for permanent storage.

Following the submission of the Environmental Impact Assessment study, the environmental terms for the project were approved on 07 November 2025 with the Decision of the Ministry of Environment and Energy on the Approval of the environmental conditions for the CO_2 storage project in Prinos, Kavala (Protocol Number ΥΠΕΝ/ΔΙΠΑ/97416/6779/07-11-2025) (evidence 7).

The Decision was completed with the Decision of the Director-General of Environmental Policy of the Ministry of Environment and Energy on the amendment of the Decision of Approval of Environmental Conditions under Protocol Number ΥΠΕΝ/ΔΙΠΑ/97416/6779/07-11-2025 (ΥΠΕΝ/ΓΠΔΔ/29723/620/16.03.2026 (ΑΔΑ: 9ΧΠΩ4653Π8-ΚΔ6) (evidence 8).

The amending decision (evidence 8) includes provisions adding the following:

‘A. Under the provisions on ‘environmental monitoring’ (section 4.7.9.1) ‘Establishment of a reporting system at least once a year for the purpose of monitoring and annual reporting of stored CO2; and confirmation of non-extraction of oil, except extraction limited to coverage the imperatives of managing pressure and ensuring the safety of premises storage, and that any amount of CO2 resulting from processes associated with the necessary extraction is separated and returned for permanent storage, in accordance with last paragraph of point (iii) of Presidential Decree 7.3.’

B. At the end of paragraph 7, clause 7.3 (Miscellaneous), as follows:

‘7.3 The Project Owner is obliged to:

i. comply with the Commission Communication on Technical Guidance on application of the principle of "do no significant harm" in the context of the establishment of the Recovery and Resilience Facility (2021/C58/01),

ii. to refrain in any way from any commercial mining activity; or oil recovery from the reservoir horizons in which CO_2 is injected;

iii. to comply with the requirement not to use any technological applications, as well as to not install or operate facilities and equipment designed or intended for Enhanced Oil Recovery (EOR) applications; or to increase the production of petroleum in the installation other than the export of petroleum; or natural gas only to the extent strictly necessary for the management pressure and ensuring the safety and integrity of storage sites, which absolutely necessary for the safe storage of CO_2. CO_2, which possibly is recovered together with the oil or natural gas, segregated and re-introduced into the storage space for permanent geological storage’.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 98 Regulatory basis for interconnection and interoperability of registries

Related Measure: 2,2.16782 Interconnection and interoperability of registries

Qualitative Indicator: Adoption of the regulatory changes including the connected primary and secondary legislation for the interconnection and interoperability of registries and services.

Time: Q4 2024

1. Context:

The objective of this reform is to facilitate the provision of digital public services to the citizens and businesses. The reform consists of introducing a framework for the interconnection and interoperability of registries and services for data exchange between public organizations.

The milestone requires the adoption of regulatory changes to establish a regulatory basis for the interconnection and interoperability of registries and services for data exchange between national public organizations.

Milestone 98 is the only milestone of this reform. The reform has a final expected date for implementation in Q4 2024.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document	Summary document duly justifying how the milestone including all constitutive elements was satisfactorily fulfilled
2	Law 4727/2020 - OJ/184A/23.12.2020	Law No. 4727 on Digital Governance (transposition into Greek law of Directive (EU) 2016/2102 and Directive (EU) 2019/1024) – Electronic Communications (transposition into Greek law of Directive (EU) 2018/1972) and other provisions
3	Ministerial Decision 13393 From 15 March 2023	Copy of the publication in the Official Journal (OJ) (B 1692/2023) - Establishes regulatory basis for

		interoperability of services between public organisations
4	Presidential Decree 40/2025 From 5 May 2025	Copy of the publication in the OJ (A 67/2025) - Sets out details on the issuance, granting, procedure, and security measures related to the Personal Number
5	Joint Ministerial Decision 14960 ΕΞ 2025 From 29 May 2025	Copy of the publication in the OJ (B 2637/2025) - Regulates the recording and storage of the Personal Number on the Identity Card
6	Digital Platform myInfo – Personal Number - https://pa.gov.gr/ https://pa.gov.gr/	Digital platform for confirming citizen information and issuing Personal Number
7	Web Portal - The Digital Governance Ministry's Web Services - https://www.gsis.gr/en/public-administration/ked/web-services	Publication of decisions on the availability of online services and web services technical specifications portal
8	Digital Platform - Interoperable services by Greek authorities (Interoperability Centre) - https://www.gsis.gr/en/public-administration/ked/interoperability-registry	Digital platform of the Interoperability Registry created by the General Secretariat for Information Systems & Digital Governance (GSISDG) (article 89 of Law 4727/2020) with the aim of continuously recording and mapping the web services, both of the GSISDG. Interoperability Centre and of the public sector web service providers

3. Analysis:

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

The adoption of regulatory changes and establishment of regulatory basis

Greece has adopted a set of binding legal acts, establishing a hierarchical regulatory framework, which consists of:

- **primary legislation** setting the legal basis for the interconnection and interoperability of registries, systems and services across the public sector (Law 4727/2020 (OJ A 184/23.12.2020))

- **secondary legislation** complementing and operationalizing the law (Ministerial Decision 13393/15.03.2023 (OJ B 1692/2023), Presidential Decree 40/2025 (OJ A 67/2025), Joint Ministerial Decision 14960 ΕΞ 2025 (OJ B 2637/2025),
- supporting operational platforms, notably the Digital Platform **myInfo – Personal Number**, the Web Portal – **the Digital Governance Ministry's Web Services**, the Digital Platform – **Interoperable Services by Greek authorities**.

The **primary law** (Law 4727/2020) establishes the general framework for digital governance in Greece. Article 84 designates the General Secretariat for Information Systems and Digital Governance (hereinafter referred to as "GSISDG") as the central authority responsible for electronic identification and authentication of natural persons, interoperability and interconnection of public sector registries and information systems, and operation of the Interoperability Centre (KED).

Article 103 establishes the precedence of the interoperability provisions of the law, ensuring legal certainty.

Article 89 provides for the establishment of an Interoperability Registry, for systematic recording, monitoring and mapping of web services offered by public sector bodies.

Article 11 introduces the Personal Number, as a mandatory unique identifier for natural persons, enabling identification of natural persons in their transactions with public sector entities, and interoperability of information systems across registries through the Interoperability Centre.

The **Ministerial Decision 13393/2023** (OJ B 1692/2023), issued by the Ministry of Digital Governance, operationalises Article 89 of the law, by establishing the Interoperability Registry as an electronic platform, defining all public bodies providing or developing web services, setting out the procedures for registration of online services, and defining the content of the registry.

The **Presidential Decree 40/2025** (OJ A 67/2025) implements Articles 11 and 107 of the law, by defining the procedure for issuing and managing the Personal Number, establishing the Personal Number Register and its content, setting out data protection safeguards, and enabling the use of the Personal Number for interoperable identity verification through public sector systems.

The **Joint Ministerial Decision 14960 ΕΞ 2025** (OJ B 2637/2025) complements the Presidential Decree by regulating the recording and storage of the Personal Number on identity cards, defining interoperability procedures between the Identity Card Issuance System, the Personal Number Register, and the Interoperability Centre, and ensuring the identity issuance.

For interconnection and interoperability of registries and services for data exchange between public organizations

In line with the description of the milestone, **interconnection** is ensured through the designation of the GSISDG as the only competent authority, the operation of the Interoperability Centre (KED) and the regulatory primacy clauses.

In addition, MyInfo – Personal Number platform https://pa.gov.gr/ is a citizen-facing digital service designed to issue and manage the Personal Number, unifying key identifiers into a single digital key used across public sector systems. It relies on interconnection to retrieve and reconcile data from multiple registries to issue the personal number.

The Web-Services Registry https://www.gsis.gr/en/public-administration/ked/web-services is a catalogue of web services that public authorities use to exchange data between public sector information systems.

Furthermore, the **interoperability** of registries and services is ensured through the Interoperability Registry. https://www.gsis.gr/en/public-administration/ked/interoperability-registry The Interoperability Registry maps the webservices that are available and that can be used for data exchange. While the Interoperability Centre constitutes the underlying infrastructure for interoperability

The Commission services accessed the links provided by the authorities on 6 January 2026 to verify the existence of a Personal Number platform, a web services catalogue, and the interoperability registry. This check was completed successfully, confirming that the legislative framework provides interconnection and interoperability of registries and services.

In line with the description of the milestone, the regulatory framework enables **data exchange** between national public organisations. The Ministerial Decision defines the procedures for registering web services used for data exchange, technical specifications and identifiers, and governance mechanisms for validation and coordination by GSISDG. The Presidential Decree and Joint Ministerial Decision enable the use of the Personal Number as a cross-registry interoperability key, as well as the secure data exchange across systems.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 110a Delivery of the project modernization of one-stop-shops

Related Measure: 2,2.16780 Modernisation of Public Administration's One-Stop Shops

Qualitative Indicator: Final project report by the Ministry of Interior documenting the completion of the further modernisation of Public Administration's One-Stop Shops.

Time: Q4 2024

1. Context:

The objective of the measure is the modernisation of Citizen Services Centres (KEP). The investment consists of the purchase of new digital equipment and tools, and the building renovation of the public administration's one-stop-shops.

Milestone 110a consists of the delivery of i) 6 325 PCs/printers/tablets, ii) 145 systems for queue management and notification, iii) 730 feedback terminals.

Milestone 110a is the second milestone of the investment, and it follows the completion of milestone 102, related to the awarding of contracts for the project. It will be followed by Milestone 110b, related to the renovation of 360 public administration one-stop-shops.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary note	A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Ministry of the Interior Report Protocol Number: 142/19.12.2025	Report issued and signed by the Minister of the Interior regarding the fulfilment of Milestone 110a and the transmission of the list of equipment that has been received by the municipalities across the country. Dated 19 December 2025
3	Guide for the implementation and financing of actions in the	Revised and updated instructions set out by the Ministry of Interior to municipalities on the

	framework of the project 'Modernisation of the KEP'	implementation and financing of actions under the project Dated 29 July 2024
4	List of Municipalities and Equipment	The list provides a detailed record for the procurement of digital equipment and systems for Municipalities across Greece.
5	Sampling documents: acceptance protocols	The acceptance protocols issued by the municipalities demonstrate the delivery of the required IT equipment
6	Contract for Unit 253, Acceptance Protocol 432	EL provided the contract for a system for queue management and notification, as the acceptance protocol was not sufficiently clear that it concerned such a system Signed 3 March 2023

3. Analysis:

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

Delivery of i) 6 325 PCs/printers/tablets, ii) 145 systems for queue management and notification, iii) 730 feedback terminals.

Following the selection of a random sample of 60 units (municipalities), Greece submitted acceptance protocols for the delivery of the required IT equipment. The evidence provided for a sample of 60 municipalities confirmed that the requirements of the milestone have been met for 58 projects. For each IT equipment, Greece provided the acceptance protocols acknowledging the delivery of the equipment. The contracts were assessed through sampling in the prior milestone 102. For 1 out of the 60 sampled units, Greece reported 5 PCs were purchased, while the acceptance protocol indicated 4 PCs were purchased. This unit therefore failed the sampling. The acceptance protocols are issued in accordance with the national public procurement legislation (L.4412/2016).
A statistical analysis was carried out taking into account the overachievement of the milestone of 6416 PCs/printers/tablets, ii) 152 systems for queue management and notification, iii) 749 feedback terminals (a total of 7317) for a required i) 6 325 PCs/printers/tablets, ii) 145 systems for queue management and notification, iii) 730 feedback terminals (a total of 7200). Based on this, there is statistical assurance that the milestone has been met, and all its constitutive elements have been satisfactorily fulfilled.

In addition, Greece provided a report issued and signed by the Minister of the Interior attesting to the fulfilment of Milestone 110a (evidence 2). This states that the Ministry of the Interior confirms that all the municipalities' contracts included have been implemented and financed in accordance with the detailed instructions set out by the Ministry of the Interior and detailed in the Guide of July 2024 (evidence 3) on the implementation and financing of actions under the project 'Modernisation of KEPs' by the Greek municipalities in accordance with the Greek National Recovery and Resilience Plan 2.0

Furthermore, in line with the description of the measure, **the objective of the measure is the modernisation of Citizen Services Centres (KEP). The investment consists of the purchase of new digital equipment and tools[...].**

Greece has provided evidence that the new digital equipment and tools were purchased and delivered

4. Commission Preliminary Assessment: Satisfactory fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 112 Cybersecurity strategy and National Cybersecurity Operations Centre

Related Measure: 2,2.16823 Cybersecurity strategy and National Cybersecurity Operations Centre

Qualitative Indicator: Delivery of the Cybersecurity Strategy and National Security Operations Centre

Time: Q4 2024

1. Context:

The objective of the measure is to improve the cybersecurity of public sector systems. The measure consists of delivering a cybersecurity strategy and a National Cybersecurity Operations Centre (SOC).

Milestone 112 consists of the delivery of the cybersecurity strategy and the National Cybersecurity Operations Centre (SOC).

Milestone 112 is the second and last milestone of the reform, and it follows the completion of milestone 104, related to contract awards for the cybersecurity strategy and policies.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary note	A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	The decisions by the Chief of the National Intelligence Service (EYP) Protocol Number: ΕΞ – 1698/15-10-2025	Decision ΕΞ-5/04-01-2023 and Decision ΕΞ-66/14-02-2022 of the Chief of the National Intelligence Service (hereinafter referred to as "EYP") regarding the confidentiality of the tender competition, contract, and acceptance of the delivery of the contract for the tender 'Creation and Support of the Cybersecurity Operations Centre (SOC) Dated 4 January 2024 **Confidential**
3	Ministerial Decision	Copy of the National Cybersecurity Strategy of Greece, as approved by the decision 2563/16.12.2025 (AD:

	2563/16.12.2025 (ΑΔΑ: ΨΜΑΞ46ΜΤΛΠ-Γ4Κ) National Cybersecurity Strategy of Greece (2026-2030)	ΨΜΑΞ46ΜΤΛΠ-Γ4Κ) of the Minister of Digital Governance and a link to the strategy https://cyber.gov.gr/ethniki-stratigiki-kyvernoasfaleias-2026-2030-enas-ethnikos-odikos-chartis-gia-ena-asfales-kai-anthektiko-psifiako-mellon/ https://eur05.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcyber.gov.gr%2Fethniki-stratigiki-kyvernoasfaleias-2026-2030-enas-ethnikos-odikos-chartis-gia-ena-asfales-kai-anthektiko-psifiako-mellon%2F&data=05|02|a.lazaridou3%40minfin.gr|72d87dfbe1484112ea3008de3d9d7a4c|74566a7f3d734abdbebbece0c2e1ad4f|0|0|639015943725374533|Unknown|TWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D|0|||&sdata=1ONl899js4m6xOBSV8x9odpboUXpNrJ9WRsLl8GBAdk%3D&reserved=0https://eur05.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcyber.gov.gr%2Feak%2Fethniki-stratigiki-kyvernoasfaleias%2F&data=05|02|a.lazaridou3%40minfin.gr|72d87dfbe1484112ea3008de3d9d7a4c|74566a7f3d734abdbebbece0c2e1ad4f|0|0|639015943725430873|Unknown|TWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D|0|||&sdata=7OnBMp7HMstNTArOrJZ9QVtyJoE7AnTBexsrgzSxDwc%3D&reserved=0
4	Contract number 8/2022 (protocol number ΕΞ APOR-17/06-04-2022)	The contract regarding the establishment of the "National Security Operations Centre (SOC)" Signed on 30/06/2023 **CONFIDENTIAL**
5	Deliverable report from the Contractor (prot.no. 1979/29-12-2023)	Deliverable report from the Contractor (prot.no. 1979/29-12-2023) regarding SOC Operation commencement. Signed on 29/12/2023 **CONFIDENTIAL**
6	Acceptance Protocol (ΕΙΣ-1998/29-12-2023)	Acceptance Protocol signed by the competent Committee accepting the deliverables related to the full operational function of SOC Signed on

		29/12/2023 **CONFIDENTIAL**

3. Analysis:

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

Delivery of i) Cybersecurity Strategy

The National Cybersecurity Strategy of Greece 2026–2030 was adopted by Ministerial Decision 2563/16.12.2025 on 16 December 2025 (evidence 3). It was developed in the context of the transposition of Directive (EU) 2022/2555 (NIS2), as transposed into national law by Law 5160/2024. However, the strategy for 2026-2030 is not limited to compliance with the requirements of EU and national law but also comprises a whole-of-society approach to cybersecurity governance, placing strong emphasis on prevention, preparedness, crisis management, and recovery. The strategy is expected to significantly strengthen cybersecurity in the public sector through targeted governance, operational, and capacity-building measures.

Key elements of the strategy include:

- The optimization of the Security Operations Centre (SOC) (evidence 3, page 77-78);
- The establishment of a framework for secure ICT procurement and supply chain security (evidence 3, page 99);
- The development of a framework of requirements for trusted cybersecurity service providers (evidence 3, pages 103-104);
- The establishment of secure-by-design principles for new public sector ICT systems (evidence 3, pages 94 - 96);
- The upgrading of protection for government websites (evidence 3, pages 88-89).

The Commission services accessed the link provided by the authorities (evidence 3) on 8 January 2025 to verify the cybersecurity strategy was adopted and published through Ministerial Decision. This check was completed successfully, confirming that the strategy was adopted and published online.

ii) the National Security Operations Centre (SOC)

The National Security Operations Centre (SOC), issues warnings, announcements and technical instructions for emerging threats in its area of responsibility, proposes preventive measures and best practices, assesses vulnerabilities in information systems and conducts training activities.

Establishment and operationalisation of the SOC was completed under Contract 8/2022 (evidence 4). The authorities acknowledged receipt of the deliverables related to the full operational function of SOC (evidence 6).

The Commission conducted an on-the-spot check on 11 December 2025 to verify the delivery of the National Security Operations Centre (SOC). The Commission services verified the following confidential documents: i) the contract (evidence 4); ii) the deliverables report from the contractor (evidence 5); iii) the acceptance protocol (evidence 6). The Commission also conducted a physical visit to the offices of the SOC. The aforementioned checks were completed successfully, confirming that the National Security Operations Centre (SOC) was delivered and operational.

4. Commission Preliminary Assessment: Satisfactory fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 142a Legislation on unemployment benefits and allowances

Related Measure: 3,1. 16746 Reform of Passive Labour Market Policies to Support Transitions to Employment

Qualitative Indicator: Entry into force of legislation

Time: Q4 2024

1. Context:

The objective of the reform is to improve the effectiveness and efficiency of passive labour market policies. The reform consists of consolidating and streamlining unemployment benefits and allowances, removing disincentives for upskilling/reskilling among the unemployed, and one pilot project to test an unemployment insurance system in Greece.

Milestone 142a requires the entry into force of legislation to consolidate and streamline unemployment benefits and allowances, and to remove disincentives for upskilling/reskilling among the unemployed by retaining their entitlement to unemployment benefits during participation in trainings.

Milestone 142a is the second milestone of the reform, and it follows the completion of milestone 142. It will be followed by milestone 142b, related to the delivery of a pilot project that will apply an indexation of the combined unemployment benefits to the latest daily net wage level.

2. Evidence provided:

	Name of the evidence	Short description
1.	Summary document	The summary document duly justifies how the milestone (including all the constitutive elements) has been satisfactorily fulfilled
2.	Law 1836/1989 (Official Journal A'/79/14.03.1989)	The law contains measures to promote employment and vocational training, and Article 22 introduces a special allowance to unemployed people who have social insurance and do not meet the requirements for receiving the regular unemployment benefit (evidence 1).
3.	Law 4144/2013 (Official Journal A/18.04.2013)	The law refers to measures for a more effective integration/reintegration of the unemployed into the labour market (evidence 2)
4.	Joint Ministerial Decision (hereinafter referred to as "JMD") 82759/2022 (Official Journal B' 4581/30.08.2022)	The JMD by the Ministers of Development and Investments, Education and Religious Affairs, and Labour and Social Affairs (Official Journal B' 4581/2022) sets the minimum and maximum duration of non-formal vocational training programmes (evidence 3)

	Name of the evidence	Short description
5.	Law 4921/2022 (Official Journal A'/ 75/18.04.2022)	The law contains provisions about the reorganization of the Public Employment Service, the digitalization of its services, and the upskilling of the labour force. Articles 24 and 79 (par. 6) introduce pilot projects to be implemented by the Public Employment Service for broadening the social safety net of jobseekers and promoting a fairer distribution of unemployment benefits, while Article 34 (par. 2) sets eligibility conditions for participation to subsidized continuing vocational training programmes (evidence 4)
6.	JMD 113582 (Official Journal B'/ 7469/29.12.2023)	The Joint Ministerial Decision by the Ministers of Labour and Social Security, and Economy and Finance sets the terms and conditions for granting the special allowance introduced by par. 6 of Article 22 of Law 1836/1989 (evidence 5)
7.	JMD 54427 (Official Journal B'/ 7047/20.12.2024)	The Joint Ministerial Decision by the Ministers of Labour and Social Security, and Economy and Finance specifies the terms and conditions of a pilot project of the Public Employment Service for granting unemployment benefits (evidence 6)
8.	Circular 147725 by the Public Employment Service, published on 11.03.2025	The circular specifies the implementation aspects of the above pilot project of the Public Employment Service for granting unemployment benefits (evidence 7)
9.	Circular 285114 by the Public Employment Service, published on 02.04.2025	The circular adjusts the unemployment benefit amount of the pilot project in line with the increase in the statutory minimum wage that took effect on 1 April 2025 by JMD 8233/27.03.2025 (evidence 8)
10.	JMD 8233 (Official Journal B/1476/27.03.2025)	The Joint Ministerial Decision sets the statutory minimum wage to apply as of 1 April 2025 (evidence 9)
11.	Law 5239/2025 (Official Journal A' /178/17.10.2025)	The law contains provisions to simplify legislation related to employment and vocational training, and Article 98 removes disincentives for unemployed individuals to participate in education and training programs (evidence 10)

3. Analysis:

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

Entry into force of legislation to consolidate and streamline unemployment benefits and allowances

This requirement is met by:

1. **Joint Ministerial Decision 113582/29.12.2023 (Official Journal B'/7469/29.12.2023) (evidence 5)** that specifies the terms and conditions for granting the special allowance of Article 22 par. 6 of Law 1836/1989 (Official Journal A'/79/14.03.1989) (evidence 1). According to the latter law, this allowance is granted to unemployed people who have social insurance and do not meet the requirements for receiving the regular unemployment benefit. In particular, JMD 113582/29.12.2023 specifies that the special allowance is granted to the following categories of people: 1. Persons who have served a custodial sentence, provided that: a. their sentence was equal to or greater than two (2) months and was not interrupted by the payment of a financial guarantee; and b. they have a positive recommendation from the prison social worker or the prison director; 2. Victims of violence and trafficking; 3. Persons detoxified on addictive substances; 4. Women who are victims of gender-based or domestic violence; 5. Single parents. The JMD further defines the eligibility criteria, the amount, and the payment procedure for the special allowance.

2. **Law 4921/2022, Official Journal A'/ 75/18.04.2022** that introduces, through Article 24, pilot projects to be financed by the Recovery and Resilience Facility and implemented by the Public Employment Service for broadening the social safety net of jobseekers and promoting a fairer distribution of unemployment benefits (evidence 4). Article 79 (par. 6) of the same law further specifies that a Joint Ministerial Decision by the Ministers of Labour and Social Security, and Economy and Finance will set out the pilot projects and the terms and conditions for granting the relevant unemployment benefits.

3. **Joint Ministerial Decision 54427/20.12.2024 (Official Journal B'/7047/20.12.2024)** that sets out the implementation aspects of a pilot unemployment benefit programme that, according to Article 1 of the JMD, will apply for 16 months over 15,000 beneficiaries (evidence 6). The tested project will consolidate and streamline the regular (short-term) and the long-term unemployment benefit with a view to promoting a fairer compensation system and strengthening the incentive to swiftly re-enter the labour market, while providing effective support to unemployed people. In particular, the JMD defines the content, the beneficiaries, the eligibility criteria, the structure, and the duration of the pilot unemployment benefit, while it specifies the amount of the benefit and the method of its calculation based on the statutory minimum wage.

4. **Circular[2] 147725/18.2.2025** (evidence 7) that specifies JMD 54427/20.12.2024 (evidence 6) by setting out the procedure for the enrolment of beneficiaries to the pilot project.

   As specified in Joint Ministerial Decision 54427/20.12.2024 (Articles 4,5 and 6) and Circular 147725/18.2.2025 (Chapter C), the unemployment benefit that is tested through the pilot project consists of three parts:

[2] The circular is an administrative instruction providing guidance for implementation. It is issued by the Greek authorities and is binding for the administration, however, it does not create law.

a) A fixed part that is calculated based on the beneficiary's average gross monthly wage over the 14 last working months in relation to the statutory minimum monthly wage and decreases over time.

b) A variable part ("bonus") that depends on the previous insurance time (from 4 years of insurance up to 20 years of insurance) and the average monthly wage of the beneficiary over the 14 last working months.

c) Additional benefits/surcharges: Christmas and Easter bonuses, child supplements and single-parent supplements.

5. **Circular 285114/02.04.2025** (evidence 8), that adjusts the unemployment benefit amount of the pilot project in line with the increase in the statutory minimum wage that took effect on 1 April 2025 as per the Joint Ministerial Decision 8233/27.03.2025 (evidence 9).

From the above evidence, it can be verified that the unemployment insurance system that is tested through the pilot merges the regular (short term) and long-term unemployment benefit into one benefit, thereby promoting efficiency and simplification. Moreover, the new unemployment insurance system provides more financial support and incentives to work, as it is frontloaded and decreases over time. Finally, the tested system promotes a contributory approach and more fairness, as the unemployment benefit is based on the previous wage level and social security contributions paid by the unemployed, contrary to the flat system that applies currently in Greece and grants the same level of unemployment, benefit to everyone.

and to remove disincentives for upskilling/reskilling among the unemployed by retaining their entitlement to unemployment benefits during participation in trainings.

This requirement is met by Article 98 of Law 5239/2025 (evidence 10) that amended Article 34 (par. 2) of Law 4921/2022 (evidence 4) and Article 30 of Law 4144/2013 (evidence 2), by relaxing constraints for unemployed individuals to take part in upskilling and reskilling programs, while maintaining their entitlement to unemployment benefits during participation in such programmes.

In particular, Article 98 of Law 5239/2025 (evidence 10) abolished Article 34 (par. 2) of Law 4921/2022 (evidence 4), according to which participation in subsidized continuing vocational training programmes was not possible for unemployed persons who a) had been trained in the same subject during the last two years that preceded the publication of the relevant call for expression of interest, and b) had made use of all of their training rights, as reflected in their skilling account. Article 98 par.1 of Law 5239/2025 (evidence 10) made it possible for an unemployed person to participate in any subsidised continuing vocational training programme, provided that a) the total training hours spent during the last calendar year that preceded the publication of the relevant call for interest do not exceed 600, in line also with Article 3.5.2 of the Joint Ministerial Decision 82759/2022 of the Ministers of Development and Investments, Education and Religious Affairs, and Labour and Social Security (Official Journal B' 4581/2022) (evidence 3). In case the training programme leads to a training certificate, it should not relate to the same skills as those obtained during the last calendar year prior to the publication of the relevant call for interest.

Moreover, Article 98 par.2 of Law 5239/2025 (evidence 10) amended Article 30 of Law 4144/2013 (evidence 2), according to which participation of unemployed persons to vocational training programmes for which the daily allowance exceeded the daily unemployment benefit would lead to reduction of the unemployment benefit entitlement period by the same duration of time. Article 98 par.2 of Law 5239/2025 made it possible for unemployed persons to participate in non-subsidised training programmes while retaining their entitlement to unemployment benefits. Participation in subsidized continuing vocational training programmes is also possible and the unemployed persons continue to receive unemployment benefits, provided only that the total number of training hours spent during the calendar year that preceded the publication of the relevant call for interest does not exceed 600, in line also with Article 3.5.2 of Joint Ministerial Decision 82759/2022 (Official Journal B' 4581/2022) of the Ministers of Development and Investments, Education and Religious Affairs, and Labour and Social Security (evidence 3).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: 144 ALMP upskilling reskilling employment programme completion

Related Measure: 3,1. - 16747 Active Labour Market Policies Reform

Qualitative Indicator: Delivery of training programme and entry into employment

Time: Q4 2024

1. Context:

The objective of the reform is to redesign and strengthen active labour market programmes. The reform consists of training and employment programmes and a temporary enhancement and upskilling of the counselling staff of the public employment service (hereinafter referred to as 'DYPA).

Milestone 144 requires the delivery of a training programme and the entry into employment for at least 7 000 unemployed persons.

Milestone 144 is the first step of the implementation of the reform. It will be followed by milestone 144a, related to a) the delivery of four targeted short-term programmes subsidising employment in the private sector for at least 30 600 unemployed persons; b) the temporary enhancement of the counselling staff of DYPA with the recruitment of 600 additional counsellors and c) training of 1 000 employment counsellors of DYPA.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Joint Ministerial Decision (hereinafter referred to as 'JMD) No. 79435 (Official Journal B' 5363/07.09.2023)	The JMD sets out implementation aspects of an integrated training and employment programme for 15 000 unemployed individuals aged 25 to 45 (evidence 1)
2	Joint Ministerial Decision No. 112410/21.12.2023 Official Journal B' 7265/21.12.2023	The JMD amends JMD No. 79435/07.09.2023 (Official Journal B' 5363) (evidence 2)
3	Joint Ministerial Decision No. 46713 (Official Journal B' 5581/07.10.2024)	The JMD amends JMD No. 79435/07.09.2023 (Official Journal B' 5363) (evidence 3)
4	Call of interest by the Governor of the DYPA No 94345/22.01.2024	The call of interest invites private sector employers, training providers, certification bodies and unemployed persons aged 25 to 45 to participate in an integrated training and employment programme (evidence 4)

5	Amendment to the Call of Interest with No 1049973/02.10.2024	The call No 1049973/02.10.2024 amends the previous call of Interest No 94345/22.01.2024 concerning the integrated training and employment programme (evidence 5)
6	Amendment to the Call No 161715/21.02.2025	The call No 161715/21.02.2025 further amends the previous call of Interest No 94345/22.01.2024 concerning the integrated training and employment programme (evidence 6)
7	Report by the Governor of DYPA No 1054531/03.12.2025	The report confirms the completion of the training programme by 7 006 previously unemployed people and the entry into employment of the same persons (evidence 7)
8	List of Beneficiaries participating in the programme	File with information about the training and employment programme of each beneficiary (evidence 8)
9	Sample of 60 training certificates	The training certificates confirm the completion of the training programme and certification of acquired skills for each of the 60 randomly selected beneficiaries (evidence 9)
10	Sample of 60 hiring declarations	The hiring declarations confirm the start of the employment programme for each of the 60 randomly selected beneficiaries (evidence 10)
11	Sample of 60 screenshots from DYPA's registers	The screenshots confirm that all the 60 randomly selected persons who completed the training programme and entered employment were unemployed before that (evidence 11)

3. Analysis:

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

Delivery of a training programme and entry into employment for at least 7 000 unemployed persons

The milestone requirement is met by the following evidence:

1. The Joint Ministerial Decision No. 79435/07.09.2023 (Official Journal B' 5363/07.09.2023) (evidence 1) on the implementation of an integrated training and employment programme for unemployed persons aged between 25 and 45 years, as amended by Joint Ministerial Decision No. 112410/21.12.2023 (Official Journal B' 7265/21.12.2023) (evidence 2) and Joint Ministerial Decision No. 46713 (Official Journal B' 5581/07.10.2024) (evidence 3).

In particular, **Joint Ministerial Decision No. 79435/07.09.2023** (Official Journal B' 5363/07.09.2023), Chapter 1, Article 1, par. 1 specifies that the Public Employment Service will cooperate with training providers in Greece to deliver training programmes in high-demand digital and green areas to unemployed persons aged between 25 and 45 years. Moreover, according to Article 1, par 2., the training programme will benefit up to 15 000 unemployed persons. Also, according to Chapter 2, Article 1, par. 2, those beneficiaries who will have completed the training envisaged under Chapter A of the same JMD will be integrated into employment allowing them to apply the skills they acquired. In particular, 15 000 new full-time jobs in the private sector will be subsidised for the recruitment of the corresponding unemployed persons.

2. The **Call of Interest by the Governor of DYPA No 94345/22.01.2024** inviting private sector employers, training providers, certification bodies and unemployed persons aged 25 to 45 to participate in an integrated training and employment programme (evidence 4), as modified by the call of interest No 1049973/02.10.2024 (evidence 5) and the call of interest No 161715/21.02.2025 (evidence 6).

3. The **report by the Governor of DYPA No 1054531/03.12.2025** that confirms the completion of the training programme by 7 006 previously unemployed people and the entry into employment of the same persons (evidence 7).

4. The **list of beneficiaries participating in the programme** (evidence 8).

5. Following the selection of a random sample of 60 units, Greece submitted:

A. The 60 training certificates of the corresponding training providers (evidence 9) to verify that the training programme had been delivered.

B. The 60 hiring declarations of the corresponding private sector employers as submitted to the labour market monitoring information system ERGANI (evidence 10) to verify that all 60 beneficiaries who have already completed the training programme, had subsequently entered employment.

C. Screenshots from the information system of DYPA with information about the unemployment history of each beneficiary (evidence 11) to verify that all the 60 randomly selected persons who had completed the training programme and entered employment were unemployed before that.

The evidence provided for a sample of 60 units confirmed that the following requirements of the milestone have been met:

- **Delivery of a training programme for at least 7 000 unemployed persons:** This requirement is met by the 60 training certificates of the corresponding training providers (evidence 9) that confirm that all beneficiaries had completed the training programme and had had their skills certified.
- **Entry into employment for at least 7 000 unemployed persons:** This requirement is met by a) the 60 hiring declarations of the corresponding private sector employers as submitted to the labour market monitoring information system ERGANI (evidence 10) that confirm that the beneficiaries had entered employment; b) the 60 screenshots retrieved from the information system of DYPA (evidence 11) that confirm that all 60 randomly selected beneficiaries –who had completed the training programme and entered employment– were unemployed before that; c) the on-the spot check on DYPA’s archives that, combined with the information from the labour market monitoring information system ERGANI, confirm that beneficiaries of the employment programme were unemployed before entering it.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 145a Legal framework VET national system

Related Measure: 3,2.16794 Strengthening the Apprenticeship System

Qualitative Indicator: Entry into force of a law on the national VET system

Time: Q4 2024

1. Context:

The objective of the measure is to upgrade the national Vocational Education and Training (hereinafter referred to as "VET") system. It consists of a new legal framework for the VET system, and modernised learning modules and infrastructure.

Milestone 145a consists in the entry into force of a law on national VET system.

Milestone 145a is the third milestone of the reform. It will be followed by milestone 145, related to the delivery of digitised training courses of the Public Employment Service's (hereinafter referred to as "DYPA") Apprenticeship Vocational Schools (hereinafter referred to as "EPAS"), and milestone 145b, related to the curricula reform, modernisation of VET infrastructure, renovation of buildings.

2. Evidence provided:

	Name of the evidence	Short description
1.	Summary note	A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2.	Law 4763/2020 "National System of Vocational Education, Training and Lifelong Learning, transposition into Greek legislation of Directive (EU) 2018/958 of the European Parliament and of the Council of 28 June 2018 on a proportionality test before adoption of new regulation of professions (OJ L 173), ratification of the Agreement between the Government of the Hellenic Republic and the Government of the Federal Republic of Germany on the Greek-German Youth Foundation and other	The law establishes the primary legislative framework for the national system of Vocational Education and Training (VET).

	provisions" (evidence 1, Government Gazette 254/A/21-12-2020), which has entered into force on 21 December 2020, pursuant to Article 171 of Law 4763/2020.	
3.	Law 4777/2021 (1st amendment of Law No. 4763/2020, article 47: "Issues of practical training and apprenticeship Amendment of article 34 of Law 4763/2020) (Official Journal 25/A/17-02-2021)	The law clarifies practical training and apprenticeship provisions and introduces transitional measures for rolling out the reformed VET system.
4.	Law 4783/2021 (2nd amendment of Law 4763/2020, article 10, "financing of OAED programmes - Amendment of article 11 of Law 4763/2020") (Official Journal 38/A/12-03-2021)	The law revises DYPA's funding framework to ensure financial sustainability of vocational education and training programmes.
5.	Law 4790/2021 (3rd amendment of Law 4763/2020, article 98: Transitional provisions of the KDBM-EOPPEP; Amendment of article 169 of Law 4763/2020) (Official Journal 48/A/31-05-2021)	The law expands transitional provisions to support uninterrupted operation of VET institutions during the reform phase.
6.	Law 4807/2021 (4th amendment of law 4763/2020, article 57: "Diploma of graduates of the OAED_ amendment of article 169 of Law 4763/2020 (Official Journal 96/A/11-06-2021)	The law enhances transitional arrangements and institutional procedures in EPAS.
7.	Law 4823/2021 (5th amendment of law 4763/2020, "Articles 206 and 207 for P.EPAS programmes and Apprenticeship Contracts_ amendment of articles 41 and 34 of Law 4763/2020) and article 28: Salary Provisions	The law updates legal provisions for PEPAS contracts, IEK operations, and salary rules for VET personnel.

	(Official Journal 136/A/3-08-2021)	
8.	Law 5078/2023 “New Method of Recruitment of DYPA’s educational personnel” (Articles 157-170) - Specialties and Experimental Specialties of EPAS article 171 (amend. of 4763/2020) (Official Journal 211/A/20-12-2023	The law strengthens DYPA’s Apprenticeship Schools through regulatory updates on recruitment, specialties, and operational frameworks.
9.	Law 5082/2024 - Strengthening of Vocational Education and Training and other urgent provisions - Renaming of IEKs to SAEKs (Official Journal 9/A/19-01-2024) (amend. Of 4763/2020)	The law introduces structural reforms, including renaming IEKs to SAEKs and establishing regional VET Centers with integrated governance models.
10.	Amendment of articles 9, 11A, 15, addition of article 11B to law 4763/2020 with article 171 - "Provisions for the Apprenticeship Schools of the DYPA of Law No. 5078/2023"	The amendment reinforces the programmatic framework of DYPA EPAS and introduces provisions for experimental specialties.
11.	Joint Ministerial Decision no. 49718/2021 (Official Journal 3078/B/13.07.2021) "Conversion of the Vocational Schools (EPAS) Apprenticeship of the OAED of Law No. 3475/2006 (A' 146) into Apprenticeship Schools (EPAS) of the OAED of the law 4763/2020"	The Joint Ministerial Decision converts legacy EPAS institutions under Law 3475/2006 into reformed EPAS entities under Law 4763/2020.
12.	Joint Ministerial Decision No. 102791/2021 (Official Journal 5832/B/14-12-2021) "Preparation of the Regulation on the Operation of Vocational Schools (EPAS) Apprenticeship of the OAED", as amended by the Joint Ministerial Decision No. 26544/05.04.2024 (2050/B/05.04.2024) is in force	The Joint Ministerial Decision establishes and later updates the operational rules of DYPA Apprenticeship Schools, including academic and evaluation procedures.

13.	Joint Ministerial Decision No. ΦΒ7/108652/Κ3/6-9-2021 (Official Journal 4146/B/9-9-2021) of the 'Quality Framework for Apprenticeships'	The Joint Ministerial Decision sets the national Quality Framework for Apprenticeships, defining standards, principles, and monitoring mechanisms.
14.	Ministerial Decision No. 57560/2021 (3552/B/03.08.2021) 'Determination of the selection criteria for students for admission to the Apprenticeship Schools (EPAS) of OAED of Law No. 4763/2020"	The Ministerial Decision defines the eligibility and selection criteria for student admission to DYPA's Apprenticeship Schools (EPAS) under the VET reform.
15.	Joint Ministerial Decision No. 86899/2021 (5164/B/05.11.2021) "Determination of the compensation of apprentices of the Apprenticeship Schools of the OAED of Law No. 4763/2020", as amended by the No. 78812/06.09.2023 JMD (Official Journal 5325/B/06.09.2023) and is in force.	The Joint Ministerial Decision establishes the compensation scheme for EPAS apprentices, setting it at 75% of the statutory minimum daily wage.
16.	Joint Ministerial Decision No. 127069/2022 (Official Journal 6955/B/30.12.2022) "Subsidy for the workplace learning programme of apprentices of the Apprenticeship Schools (EPAS) of the Public Employment Service (DYPA) of the Law No. 4763/2020 employed in the public sector, in public sector institutions, in local authorities, in enterprises of local government organizations (O.T.A.), in private enterprises or farms, in associations, in unions in the year 2023"	The Joint Ministerial Decision grants a public subsidy of €16.54/day for EPAS apprentices participating in the 2023 workplace learning programme.

17.	Joint Ministerial Decision No 26860/2024 (Official Journal 2052/B/05.04.2024) 'Subsidy for the workplace learning programme for apprentices of the Apprenticeship Schools (EPAS) of the Law 4763/2020, who will be employed in the public sector, in public sector bodies, in enterprises of local authorities (O.T.A.), in private enterprises or farms, in associations, in unions, etc. in the year 2024"	The Joint Ministerial Decision sets a €25/day subsidy for EPAS apprentices engaged in workplace learning for 2024.
18.	Joint Ministerial Decision No. 82555/2021 (Official Journal 4959/B/26.10.2021) "Establishment and operation of seven (7) Experimental Apprenticeship Schools (P.EPA.S) OAED in the tourism and hospitality sector". The decision of the Governor of OAED No. 112239/29.10.2021 regarding the operation of seven (7) Experimental Vocational Schools (P.EPA.S) Apprenticeship OAED.	The Joint Ministerial Decision authorizes the establishment and operation of seven Experimental Apprenticeship Schools (PEPAS) in tourism and hospitality.
19.	Joint Ministerial Decision No. 32134/2022 (Official Journal 1639/B/05.04.2022) "Regulation of the Operation of the Experimental Apprenticeship Schools (P.EPA.S) of OAED in the tourism and hospitality sector"	The Joint Ministerial Decision details the operational regulation of the Experimental Apprenticeship Schools (PEPAS) in tourism and hospitality sectors.
20.	Joint Ministerial Decision No. 37169/2022 (Official Journal 1959/B/19.04.2022) "Determination of the compensation of apprentices of the Experimental Apprenticeship Schools (P.Epa.S) of OAED in the tourism and hospitality sector", as amended by No.	The Joint Ministerial Decision determines apprentice compensation for PEPAS at 95% of the statutory minimum daily wage, fully paid by the employer.

	78811/06.09.2023 (Official Journal 5325/B/06.09.2023) and is in force	
21.	Joint Ministerial Decision No. 49671/2021 (Official Journal 3263/B/22.07.2021) 'Conversion of the Vocational Training Institutes (I.E.K.) of the OAED of Law No. 4186/2013 into Vocational Training Institutes (S.A.E.K.) OAED (D.Y.P.A.) of law. 4763/2020"	The Joint Ministerial Decision converts OAED's former IEK units into SAEK institutions aligned with the new VET legal framework under Law 4763/2020.
22.	Joint Ministerial Decision No. 81127/2022 (Official Journal 4796/B/12-9-2022) "Regulation of the Operation of Vocational Training Institutes (IEK) of the Public Employment Service (DYPA)"	The Joint Ministerial Decision establishes the full operating framework of DYPA's Vocational Training Institutes (IEK), including governance and curricula.
23.	Joint Ministerial Decision No 39883/2023 (Official Journal 2476 B) 'Paid traineeships for students of Vocational Training Institutes (IEK) of the Public Employment Service (DYPA) of Law No 4763/2020'	The Joint Ministerial Decision regulates the implementation of paid traineeships for students attending DYPA's IEK units under Law 4763/2020.
24.	Joint Ministerial Decision No. 102364 (Official Journal 5831/B/14-12-2021)" Procedure and selection criteria for the selection of Directors of Vocational Education and Training Units of the OAED"	The Joint Ministerial Decision specifies the procedure and criteria for appointing Directors of EPAS, PEPAS, and IEK units within DYPA's VET structure.
25.	Joint Ministerial Decision No. 109782 (Official Journal 5946/B/21-11-2022) "Determination of the number of apprentices of the Public Employment Service (DYPA) who will carry out apprenticeship (workplace learning programme) in public	The Joint Ministerial Decision sets the number of EPAS apprentices eligible for public-sector placements during the 2022–2023 school year.

	sector institutions during the school year 2022-2023”	
26.	Joint Ministerial Decision No. 32612 (Official Journal 2897/B/22-5-2024) “Determination of the number of apprentices of the Public Employment Service (DYPA) who will carry out apprenticeship (workplace learning programme) in public sector institutions during the school year 2023-2024”	The Joint Ministerial Decision determines the number of EPAS apprentices for public-sector placements for the 2023–2024 academic year.
27.	Ministerial Decision No. 57531/2021 (Official Journal 3552/B/03.08.2021) "Determination of criteria and evaluation and selection procedure of the teaching staff of the Apprenticeship Schools (EPAS) of OAED".	The Ministerial Decision defines the eligibility criteria and evaluation process for the recruitment of teaching staff in DYPA Apprenticeship Schools (EPAS), including qualification thresholds and scoring methods.
28.	Ministerial Decision no. 107112 (Official Journal 6230/B/24-12-2021)” Terms and conditions of accommodation and subsistence for students of the Apprenticeship Schools (EPAS) and (P.EPAS) of OAED”	The Ministerial Decision regulates the conditions under which students of EPAS and PEPAS schools can receive support for accommodation and meals during their studies.
29.	Ministerial Decision no. 107675 (Official Journal 6263/B/27-12-2021) “Establishment of a minimum wage and minimum daily wage for employees and craft workers throughout the country” (linked to the compensation of apprentices of EPAS and PEPAS)	The Ministerial Decision establishes the national minimum wage and daily wage levels for employees and workers, serving as a basis for calculating EPAS and PEPAS apprentice compensation.
30.	Ministerial Decision no. 38866 (Official Journal 2030/B/21-4-2022) “Establishment of a minimum wage and minimum daily wage for employees and craft workers throughout the country.” (linked to the	The Ministerial Decision updates the statutory minimum wage and daily wage rates across the country, affecting apprentice remuneration for EPAS and PEPAS programmes.

	compensation of apprentices of EPAS and PEPAS)	
31.	Ministerial Decision no. 31986 (Official Journal 2003/B/28-3-2023) “Establishment of a minimum wage and minimum daily wage for employees and craft workers throughout the country” (linked to the compensation of apprentices of EPAS and PEPAS)	The Ministerial Decision revises the national minimum wage framework, further impacting compensation levels for apprentices within the VET system under Law 4763/2020.
32.	Ministerial Decision no. 25058 (Official Journal 1974/B/29-3-2024) “Establishment of a minimum wage and minimum daily wage for employees and craft workers throughout the country” (linked to the compensation of apprentices of EPAS and PEPAS)	The Ministerial Decision sets the most recent adjustment of the minimum wage and daily wage for employees and workers nationwide, continuing to underpin the pay calculations for EPAS and PEPAS apprentices.
33.	The "Call for applications for the Register of Temporary Substitutes and Hourly Teachers of the Public Employment Service (DYPA)" (Decision No. 880015/08.08.2024).	The Decision announces the opening of the Register for Temporary Substitute and Hourly-paid Teachers for DYPA Apprenticeship Schools, outlining application procedures and eligibility conditions.
34.	Decision of the General Secretariat for Vocational Education, Training and Lifelong Learning (G.G.E.E.K.&D.V.M.) no. ΦΒ1/136693/Κ3 (Official Journal 6716/B/30-11-2023) “Definition of the type and basic terms of the apprenticeship contract of the vocational education and training structures of levels 3 and 5 of the National Qualifications Framework”	The Decision defines the standard format and key contractual terms for apprenticeship agreements signed under level 3 and 5 VET structures, aligning with the National Qualifications Framework.
35.	Decision no. FB6/148840/K3 (Official Journal 7564/B/31-12-2023)” Training Curricula for P.EPAS specialties (3 specialties	The Decision approves the detailed training curricula for three new specialties offered within PEPAS schools in the tourism and hospitality sector

	in the field of tourism and hospitality”	
36.	The Joint Ministerial Decision no. 51/K6 (Official Journal 1/B/02-01-2024) “Certification system for graduates of the Apprenticeship Schools (EPAS) and the Experimental Apprenticeship Schools (PEPAS) of DYPA”	The Joint Ministerial Decision stablishes the certification process and standards for graduates of EPAS and PEPAS schools under DYPA, including assessment and validation methods.

3. Analysis:

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

Entry into force of a law on the national VET system

This requirement is met by:

Law 4763/2020 “National System of Vocational Education, Training and Lifelong Learning, transposition into Greek legislation of Directive (EU) 2018/958 of the European Parliament and of the Council of 28 June 2018 on a proportionality test before adoption of new regulation of professions (OJ L 173), ratification of the Agreement between the Government of the Hellenic Republic and the Government of the Federal Republic of Germany on the Greek-German Youth Foundation and other provisions” (evidence 1, Government Gazette 254/A/21-12-2020), which has entered into force on 21 December 2020, pursuant to Article 171 of Law 4763/2020, establishes the primary legislative framework for the national system of VET).

Law 4763/2020 introduces the main legal and institutional framework for the national VET system in Greece, including roles and responsibilities of DYPA, and the structure and governance of EPAS, Experimental Apprenticeship Schools (hereinafter referred to as “PEPAS”), Model Vocational High Schools (hereinafter referred to as “P.EPA.L”), and Vocational Training Institutes (hereinafter referred to as “IEK”). In addition, Law 4763/2020 introduces provisions in relation to Training Guides and Graduate Certification, National Qualifications Framework, Lifelong Learning Centres and Second Chance Schools. Throughout the Law, numerous articles contain enabling provisions that authorize the relevant Ministers to issue decisions specifying detailed operational procedures, curricula, certification processes, administrative arrangements, staff qualifications, and funding mechanisms necessary for implementation.

Since its adoption, Law 4763/2020 has been amended through a series of laws, all of which entered into force and were published in the Official Journal. Law 4763/2020 laid the foundational legal and institutional framework for the national VET system, which was further specified, expanded, and operationalized through subsequent legislative acts during the implementation of Measure 16794, to strengthen the legal framework of DYPA’s EPAS and PEPAS.

These amendments, address key operational, financial, transitional, and governance aspects of the apprenticeship system of EPAS and PEPAS, and were critical to addressing the practical, administrative, financial, and transitional elements necessary for the implementation of a fully operational, modernized, and labour-market-responsive VET system, in line with the objectives of Milestone 145a and measure 16794.

Specifically, the primary legislation and the legislative amendments to Law 4763/2020 (Items 2–10, list of provided evidence) collectively reinforced and refined the legal framework governing Greece's national system for VET, with a particular focus on the re-establishment and modernization of DYPA's EPAS and the introduction of PEPAS. The amendments introduced to Law 4777/2021 provided for: the clarification of procedures related to practical training and apprenticeship contracts, the establishment of a sustainable funding model for EPAS and PEPAS, and comprehensive transitional provisions to ensure the continuity of training services during the reform process. Further adjustments addressed the institutional operation of EPAS and PEPAS, the development of new experimental specialties, modernized recruitment mechanisms for training personnel, and codified cooperation pathways between vocational training institutions and the labour market. Together, these legislative acts form the complete primary legal framework required for the implementation of the national VET system reform under Milestone 145a.

The secondary legislation consists of sixteen Joint Ministerial Decisions (Items 11-13, 15-26 and 36, list of provided evidence) seven Ministerial Decisions (Items 14, 27-32, list of provided evidence), as well as three Decisions (items 33-35, list of provided evidence). The adoption of secondary legislation (Items 11–36, list of provided evidence) was essential for operationalizing the VET system established under Law 4763/2020 and its subsequent amendments. These Joint Ministerial Decisions, Ministerial Decisions, and implementing acts translated the primary legal framework into detailed arrangements that enabled the full and effective functioning of DYPA's EPAS and PEPAS. More specifically these arrangements are divided into:

- Institutional (Items 11, 13-14 and 24), by aligning vocational schools with the formal educational system or outlining the National Quality Framework for Apprenticeships and setting the remuneration framework of trainees in OAED Vocational Schools,
- Administrative (Items 19, 21, 25-28, 33-35), by defining new curricula for PEPAS specialties, eligibility criteria for EPAS teaching staff candidates, setting capacity for EPAS apprenticeships at a number of public-sector bodies, regulating the management of substitute and hourly-paid teachers, and defining the format for apprenticeship agreements,
- Procedural (Items 12, 18, 22 and 36), by defining the organizational framework and operational procedures of the EPAS/PEPAS graduates' certification process, ensuring OAED Vocational Schools' compliance with national educational policies and defining operational rules and standards for the functioning of Vocational Training Institutes under DYPA's framework,
- and Financial arrangements (Items 15-17, 20, 23, 29-32), by setting compensation for apprenticeships programmes in relation to changes to the national minimum wage and providing funding and guidelines mechanisms to enhance the effectiveness of apprenticeship programs within the National Vocational Education and Training System.

Collectively, this secondary legislation ensures the coherent execution of the reform by embedding quality assurance, equitable access, administrative control, and labour-market relevance across all levels of the VET system. It supports the achievement of Milestone 145a by guaranteeing that all institutional, operational, and financial dimensions of the reformed system are fully regulated and in force.

Based on the above, it is considered that Milestone 145a has been fulfilled with the entry into force of Law 4763/2020, as subsequently amended by Laws 4777/2021, 4783/2021, 4790/2021, 4807/2021, 4823/2021, 5078/2023 and 5082/2024, and the adoption of the corresponding secondary legislation, effectively re-establishing the Apprenticeship Vocational Schools of the Public Employment Service (EPAS and PEPAS) as a cornerstone of the national strategy for strengthening VET and promoting youth employment, in alignment with measure 16794.

Based on the above, it is considered that Milestone 145a has been fulfilled with the entry into force of Law 4763/2020 on 21 December 2020, which was amended for the last time on 19 January 2024 by Law 5082/2024 (Official Journal 9/A/19-01-2024).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Target: 166 PHC – primary healthcare units with renovated infrastructure - step 1

Related Measure: 3,3.16755 Reform of the Primary Health Care System

Quantitative Indicator: Number of Primary Healthcare units where infrastructure was renovated

Baseline: 0

Target: 15

Time: Q4 2025

1. Context:

The objective of the measure is to upgrade the infrastructure and medical equipment of primary healthcare units and reorganize the primary health care system by retraining staff to act as first-line care. The measure consists of the renovation of primary healthcare units for energy efficiency and the delivery of medical equipment. It also consists of the submission of proposals for the reform of Primary Health Care (PHC), a pilot referral mechanism, trainings to PHC staff, and a digital platform for PHC decision-making. Finally, it includes the expansion of the availability of family medicine curricula in medical curricula and the creation of chronic diseases management units.

The target requires for at least 15 primary healthcare units, infrastructure renovations for energy efficiency and the creation of Chronic Diseases Management Unit in each primary healthcare unit.

Target 166 is the second target of the reform, and it follows the completion of milestone 159, related to the expansion of Primary Health Care family medicine curricula. It will be followed by targets and milestones 166a, 166b, 166c, and 166d.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary note	A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Annex table of list of primary healthcare (PHC) units	The Annex Table documents information on the 15 renovated PHC units
Koropi, Lavrio, Kapandriti		
3	Copy of the "Certificate of completion for the project "'Energy and functional upgrading and renewal of health centres (KY) of Koropi, Lavrio, Kapandriti, Kalyvia, Markopoulo, Nea Makri, Spata' – Section A 'Energy and functional upgrading and renewal of	Certificate of completion certifying the completion of works issued by the head of the Single Technical Service of the 1st Regional Health Authority and dated 20 November

	health centres (KY) of Koropi, Lavrio, Kapandriti" Ref. No.: 46413	2025, with report from supervising engineers
4	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) VASILEIOS KONSTANTINOU 7 19400, KOROPI" Ref. No.: 308676/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 19 November 2025
5	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) IAKOVOU DIAMANTOPOULOU 19500, LAVRIO" Ref. No.: 309394/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 19 November 2025
6	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) GRAMMATIKO GIANNI 19014, KAPANDRITI" Ref. No.: 308683/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 19 November 2025
Markopoulo		
7	Copy of the partial Certificate of completion for the project "Section B: Energy and functional upgrading and upgrading of health centres (KY) at the Kalyvia KY, Markopoulo KY" of broader the project "Energy and functional upgrading and upgrading of health centres (KY) at Koropi, Lavrio, Kapandriti, Kalyvia, Markopoulo, Nea Makri, Spata" Ref. No.: 46417	Certificate of completion certifying the completion of works issued by the head of the Single Technical Service of the 1st Regional Health Authority and dated 20 November 2025, with report from supervising engineers
8	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) EFANGELISTRIA TERMA 19003, MARKOPOULO MESOGAIA" Ref. No.: 308542/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 19 November 2025
Nea Makri		
9	Copy of the partial Certificate of completion for project "Section C: Energy and Functional Upgrading and Renovation of Health Centers (KY) of Nea Makri KY, Spata KY" of the broader project "Energy and functional upgrading and upgrading of health centres (KY) of Koropi, Lavrio, Kapandritiou, Kalyvia, Markopoulo, Nea Makri, Spata". Ref. No.: 46418	Certificate of completion certifying the completion of works issued by the head of the Single Technical Service of the 1st Regional Health Authority and dated 20 November 2025, with report from supervising engineers
10	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) Artemida 19005, Nea Makri" Ref. No.: 308681/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 19 November 2025
Vari, Megara, Galata, Aegina		
11	Copy of the Certificate of completion for project "Energy and functional upgrading and upgrading of	Certificate of completion certifying the completion of works issued by

	health centres (KY) at Vari, Megara, Galata and Aegina". Ref. No.: ETY/18009	the head of the Single Technical Service of the 2nd Regional Health Authority and dated 20 March 2025, with report from supervising engineer
12	Copy of the technical description of work – technical specifications for project: "Energy and functional upgrade and renewal of a Vari health centre (vs)"	Technical specifications demonstrating inclusion of creation of chronic disease management unit as part of the works, dated 2023
13	Copy of the technical description of work – technical specifications for project: "Energy and functional upgrade and renewal of the Megara health centre (vs)"	Technical specifications demonstrating inclusion of creation of chronic disease management unit as part of the works, dated 2023
14	Copy of the technical description of work – technical specifications for Project: "Energy and functional upgrade and refurbishment of health centre (vs) Galata"	Technical specifications demonstrating inclusion of creation of chronic disease management unit as part of the works, dated 2023
15	Copy of the technical description of work – technical specifications for project: "Energy and functional upgrade and refurbishment of health centre (vs) Aegina"	Technical specifications demonstrating inclusion of creation of chronic disease management unit as part of the works, dated 2023
16	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) TRIPTOLEMO AND MOUTOUSI 16672, VARI" Ref. No.: 312017/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 24 November 2025
17	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) MEGARA HEALTH CENTER 19100, MEGARA" Ref. No.: 312015/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 25 November 2025
18	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) AG. SOTIRA 18020, GALATA" Ref. No.: 312025/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 24 November 2025
19	Copy of the "ENERGY PERFORMANCE CERTIFICATE (EPC) - 18010, AEGINA" Ref. No.: 312019/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 24 November 2025
Archangelos and Rhodes		

20	Copy of the Certificate of completion for the project “Energy and functional upgrading and upgrading of healthcare centres (KY) Archangelos, Empona, Rhodes and a multi-purpose regional clinic (PPI) Gennadio” Ref. No.: ETY/77083	Certificate of completion certifying the completion of works issued by the head of the Single Technical Service of the 2nd Regional Health Authority and dated 27 November 2025, with report from supervising engineer
21	Copy of the “ENERGY PERFORMANCE CERTIFICATE (EPC) National Road Rhodes - Lindos 0 85102, Archangelos Rhodes” Ref. No.: 313273/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 25 November 2025
22	Copy of the “ENERGY PERFORMANCE CERTIFICATE (EPC) ERNEST ZILLER 85100, AGIOI APOSTOLOI – RHODES” Ref. No.: 315829/2025	Energy Performance Certificate demonstrating achievement of Energy Class B+, dated 27 November 2025
Almyros, Argalasti and Velestino		
23	Copy of the Certificate of completion for the project “Energy upgrade. Modernisation. Improvement and Renovation of Health Centres Almyros, Argalasti and Velestino”. Ref. No.: 61779	Certificate of completion certifying the completion of works issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority and dated 18 July 2025, with report from supervising engineer
24	Copy of the technical description of work – technical specifications for the project “Energy upgrade. Modernisation. Improvement and Renovation of Almyros Health Centres, Argalasti and Velestino”	Technical specifications demonstrating inclusion of creation of chronic disease management unit as part of the works
25	Copy of the “ENERGY PERFORMANCE CERTIFICATE (EPC) ALMYROS-PATHE NATIONAL ROAD 37100, ALMYROS” Ref. No.: 294138/2025	Energy Performance Certificate demonstrating achievement of Energy Class B+, dated 03 November 2025
26	Copy of the “ENERGY PERFORMANCE CERTIFICATE (EPC) PROVINCIAL VOLOU STREET– ARGALASTIS 37006, ARGALASTI” Ref. No.: 311347/2025	Energy Performance Certificate demonstrating achievement of Energy Class B, dated 21 November 2025
27	Copy of the “ENERGY PERFORMANCE CERTIFICATE (EPC) MUNICIPALITY 37500, VELESTINO” Ref. No.: 295733/2025	Energy Performance Certificate demonstrating achievement of Energy Class B, dated 18 November 2025
Alonissos		

28	Copy of the Certificate of completion for the project “Energy Upgrade, Modernisation, Improvement and Renovation of 1 Multi-Purpose Regional Clinic and 6 Health Centres of the 5th Health Region – Section A: Panhellenic University of Alonissos” Ref. No.: 66282	Certificate of completion certifying the completion of works issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority and dated 01 August 2025, with report from supervising engineer
29	Copy of the the technical description of work – technical specifications for the project “ENERGY UPGRADE, MODERNISATION, IMPROVEMENT AND REVITALISATION OF 1 MULTI-PURPOSE REGIONAL CLINIC AND 6 HEALTH CENTRES SECTION A: ALONISSOS”	Technical specifications demonstrating inclusion of creation of chronic disease management unit as part of the works
30	Copy of the “ENERGY PERFORMANCE CERTIFICATE (EPC) PROVINCIAL ROAD PATITIRIOU CHORAS ALONISSOU, ALONISSOS 37005, ALONISSOS” Ref. No.: 305703/2025	Energy Performance Certificate demonstrating achievement of Energy Class A+, dated 14 November 2025

3. Analysis:

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

For at least 15 primary healthcare units, infrastructure renovations for energy efficiency and the creation of Chronic Diseases Management Unit in each primary healthcare unit.

For the purposes of this target, the Greek authorities provided evidence for 15 primary healthcare (hereinafter referred to as “PHC”) units (evidence 2) in line with the procedures under Article 168 of Law N.4412/2016 Greek Public Procurement Law which regulates how public authorities buy works, supplies, and services.

For **Koropi, Lavrio and Kapandriti**: A Certificate of completion was issued by the head of the Single Technical Service of the 1st Regional Health Authority based on the report from the supervising engineers (both in evidence 3). The Certificate of completion confirms the completion of the works and the creation of a chronic disease management unit in each of the aforementioned PHC units as part of the project “Energy and functional upgrading and renewal of health centres (KY) of Koropi, Lavrio, Kapandriti, Kalyvia, Markopoulou, Nea Makris, Spata’ – Section A ‘Energy and functional upgrading and renewal of health centres (KY) of Koropi, Lavrio, Kapandriti”. Additionally, an energy performance certificate (hereinafter referred to as “EPC”) was issued for each of the PHC units (evidence 4, 5, 6) demonstrating the achievement of Energy Class A+ for each PHC unit.

For **Markopoulo**: A partial Certificate of completion was issued by the head of the Single Technical Service of the 1st Regional Health Authority based on the report from the supervising engineers (both in evidence 7). The Certificate of completion confirms the completion of the works and the creation of a chronic disease management unit for Markopoulo. It is a partial certificate of completion because it confirms the renovation of one PHC unit as part of the broader project “Energy and functional upgrading and upgrading of health centres (VS) at Koropi, Lavrio, Kapandritiou, Kalyvia, Markopoulo, Nea Makris, Spata' – SECTION B 'Energy and functional upgrading and upgrading of health centres (VS) at the Kalyvia VS, Markopoulo VS". Additionally, an EPC was issued for the PHC unit (evidence 8) demonstrating the achievement of Energy Class A+.

For **Nea Makri**: A partial Certificate of completion was issued by the head of the Single Technical Service of the 1st Regional Health Authority based on the report from the supervising engineers (both in evidence 9). The Certificate of completion confirms the completion of the works and the creation of a chronic disease management unit for Nea Makri. It is a partial certificate of completion because it confirms the renvation of one PHC unit as part of the broader project "Energy and functional upgrading and upgrading of health centres (KYs) of Koropi, Lavrio, Kapandriti, Kalyvia, Markopoulo, Nea Makri, Spata' – Section C: 'Energy and Functional Upgrading and Renovation of Health Centres (KY) of Nea Makri KY and Spata KY". Additionally, an EPC was issued for the PHC unit (evidence 10) demonstrating the achievement of Energy Class A+.

For **Vari, Megara, Galatas and Aegina**: A Certificate of completion was issued by the head of the Single Technical Service of the 2nd Regional Health Authority based on the report from the supervising engineers (both in evidence 11). The Certificate of completion confirms the completion of the works as part of the project "Energy and functional upgrading and upgrading of health centres (VS) at Vari, Megara, Galatas and AIGINAS". The Greek authorities also provided copies of the technical specifications for the works confirming the inclusion of the creation of chronic disease management units in each of the PHC units (evidence 12, 13, 14, 15). Additionally, an EPC was issued for each of the PHC units (evidence 16, 17, 18, 19) demonstrating the achievement of Energy Class A+ for each PHC unit.

For **Archangelos and Rhodes**: A Certificate of completion was issued by the head of the Single Technical Service of the 2nd Regional Health Authority based on the report from the supervising engineer (both in evidence 20). The Certificate of completion confirms the completion of the works and the creation of a chronic disease management unit as part of the project "Energy and functional upgrading and upgrading of healthcare centres at Archagelou, Empona, Rhodes and a multi-purpose regional clinic (PPI) at Gennadiou". Additionally, an EPC was issued for each of the PHC units (evidence 21, 22) demonstrating the achievement of Energy Class A+ for Archangelos and B+ for Rhodes.

For **Almyros, Argalasti and Velestino**: A Certificate of completion was issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority based on the report from the supervising engineer (both in evidence 23). The Certificate of completion confirms the completion of the works as part of the project "Energy Upgrade. Modernisation. Improvement and Renovation of Almyros, Argalasti and Velestinou Health Centres". The Greek authorities also provided a copy of the technical specifications for the works confirming the inclusion of the creation of chronic disease management units in each of the PHC (evidence 24). Additionally, an EPC was issued for each of the PHC units (evidence 25, 26, 27) demonstrating the achievement of Energy Class B+ for Almyros, B for Argalasti and B for Velestino.

For **Alonissos:** A Certificate of completion was issued by the deputy head of management of the Single Technical Service of the 5th Regional Health Authority based on the report from the supervising engineer (both in evidence 28). The Certificate of completion confirms the completion of the works as part of the project "Energy Upgrade, Modernisation, Improvement and Renovation of 1 Multi-Purpose Regional Clinic and 6 Health Centres of the 5th Health Region – Department A: Panhellenic University of Alonnisos". The Greek authorities also provided a copy of the technical specifications for the works confirming the inclusion of the creation of chronic disease management units in the PHC unit (evidence 29). Additionally, an EPC was issued for the PHC unit (evidence 30) demonstrating the achievement of Energy Class A+.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 168 Digital transformation – Expansion of the appointment creation and management system within the framework of the National Vaccination Program against COVID-19, infrastructure upgrade of the Electronic Prescription System

Related Measure: 3,3.16752 Digital Transformation of Health (DigHealth)

Qualitative Indicator: 1. Expansion of the appointment creation and management system within the framework of the National Vaccination Program against COVID-19, 2. Infrastructure upgrade of the Electronic Prescription System

Time: Q2 2025

1. Context:

The objective of the measure is to digitalise the national health system. The measure consists of the delivery of digital projects in the healthcare sector.

Milestone 168 comprises of the following:1. Expansion of the appointment creation and management system within the framework of the National Vaccination Program against COVID-19, and 2. Infrastructure upgrade of the Electronic Prescription System.

Milestone 168 is the second milestone of the investment, and it follows the completion of milestone 167. It will be followed by milestone 173, 173a and 173b.

2. Evidence provided:

	Name of the evidence	Short description
1	Contract No 2027 between Information Society SA and Pricewaterhousecoopers ADAM: 22SYMV011723636 2022-12-02 Signed on 1 December 2022	Contract title: "Provision of Extension Services for the Appointment Scheduling and Management System, as well as for the Implementation of Vaccinations, within the Framework of the National Vaccination Programme" Dated on 1 December 2022
2	Deliverable Π.1.1 of Phase 1 of Contract Contract No 2027	Deliverable Π.1.1 by the contractor regarding the finalisation and delivery of the "Implementation Study" of Phase 1
3	Deliverable Π.1.2 of Phase 1 of Contract Contract No 2027	Deliverable Π.1.2 by the contractor regarding the finalisation and delivery of the "Integrated Appointment Management Subsystem &

		Documentation of Functionality Tests" of Phase 1
4	Deliverable Π.1.3 of Phase 1 of Contract Contract No 2027	Deliverable Π.1.3 by the contractor regarding the finalisation and delivery of the "Integrated Appointment Management Subsystem for Tablets & Documentation of Functionality Tests" of Phase 1
5	Deliverable Π.1.4 of Phase 1 of Contract Contract No 2027	Deliverable Π.1.4 by the contractor regarding the finalisation and delivery of the "Report on audit results (Architecture extension, Amazon Cloud operation configuration & interoperability extensions)" of Phase 1
6	Deliverable Π.1.5 of Phase 1 of Contract Contract No 2027	Deliverable Π.1.5 by the contractor regarding the finalisation and delivery of the "Penetration test report/System security" of Phase 1
7	Deliverable Π.1.1 of Phase 1 of Contract Contract No 2027	Deliverable Π.1.6 by the contractor regarding the finalisation and delivery of the "Up-to-date Control Tower reports" of Phase 1
8	On-the-spot check conducted by the Commission services on 12 December 2025	This meeting was conducted as on-the-spot control as provided by Article 6(4) of the Financing Agreement, in order to verify that the appointment creation and management system within the framework of vaccination against COVID-19 was expanded
9	Acceptance Protocol of qualitative and quantitative acceptance of Phase 1 and deliverables Π.1.1-Π1.6 of Contract No 2027 Signed on 20 July 2023	Acceptance protocol signed by the monitoring committee of Information Society SA for the final acceptance of Deliverables Π.1.1-Π1.6 of the project, which concern the expansion of the appointment creation and management system within the national framework of vaccination against Covid-19 Dated on 20 July 2023
10	Contracting Authority's (Information Society SA) Approval Decision of acceptance of the Completion of Phase 1	Approval Decision of the Board of Directors of "Information Society S.A." of deliverables of Phase 1. Issued on 27 July 2023

	with protocol number: 16835/27-07-2023 ΑΔΑ: Ψ8ΠΓ469Η4Σ-ΚΟΕ	
11	Contract No. 80/2023 between HDIKA SA and BYTE Computer Industrial & Commercial SA.ADAM: 23SYMV013711082 2023-11-0 Signed on 12 December 2023	Contract Title: "Infrastructure Upgrade of the Electronic Prescription System" Dated on 12 December 2023
12	Deliverable ΠΑ.4 of Phace A of Contract No. 80/2023	Deliverable_ΠΑ.4 by the contractor regarding the finalisation and delivery of the "Data and Application Migration Methodology" of Phase A
13	Deliverable ΠΒ.1 of Phace B of Contract No. 80/2023	Deliverable ΠΒ.1: "Software Licenses Delivery"
14	Deliverable ΠΒ.2 of Phace B of Contract No. 80/2023	Deliverable ΠΒ.2 by the contractor regarding the finalisation and delivery of the "Equipment Delivery" of Phase B
15	Deliverable ΠΓ.1 of Phace Γ of Contract No. 80/2023	Deliverable ΠΓ.1 by the contractor regarding the finalisation and delivery of the "Documentation of Equipment Installation and Ready-to-Use Software" of Phase Γ
16	Deliverable ΠΓ.2 of Phace Γ of Contract No. 80/2023	Deliverable ΠΓ.2 by the contractor regarding the finalisation and delivery of the "Finalized Control Scenarios" of Phase Γ
17	Deliverable ΠΓ.3 of Phace Γ of Contract No. 80/2023	Deliverable ΠΓ.3 by the contractor regarding the finalisation and delivery of the "Report on core application upgrade works" of Phase Γ
18	Deliverable ΠΓ.4 of Phace Γ of Contract No. 80/2023	Deliverable ΠΓ.4 by the contractor regarding the finalisation and delivery of the "Report on the adaptation of existing prescription application systems" of Phase Γ
19	Deliverable ΠΓ.5 of Phace Γ of Contract No. 80/2023	Deliverable ΠΓ.5 by the contractor regarding the finalisation and delivery of the "Data and Application Migration Report" of Phase Γ
20	Deliverable ΠΓ.6 of Phace Γ of Contract No. 80/2023	Deliverable ΠΓ.6 by the contractor regarding the finalisation and delivery of the "Control Scenarios Execution Results" of phase Γ
21	Deliverable ΠΕ.4 of Phace E of Contract No. 80/2023	Deliverable_ΠΕ.4 by the contractor regarding the finalisation and delivery of the "Disaster Recovery Plan" of Phase E

22	Deliverable ΠΣΤ.1 of Phace ΣΤ of Contract No. 80/2023	Deliverable ΠΣΤ.1 by the contractor regarding the finalisation and delivery of the “Results of the full trial period (optimizations and corrections of errors in hardware and application)” of Phase ΣΤ
23	Final Acceptance Protocol of qualitative and quantitative acceptance of phase ΣΤ and phases Α, Β, Γ, Δ, Ε of Contract No. 80/2023 Protocol Number: Α.Π.: 2293/25.02.2025 Signed on 25 February 2025	Acceptance protocol signed by the monitoring committee of HDIKA SA for the final acceptance of phase ΣΤ and phases Α, Β, Γ, Δ, Ε of the project. Dated on 25 February 2025
24	On-the-spot check conducted by the Commission services on 16 December 2025	This meeting was conducted as on-the-spot control as provided by Article 6(4) of the Financing Agreement, in order to verify that the Electronic Prescription System is upgraded

3. Analysis:

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

1. Expansion of the appointment creation and management system within the framework of the National Vaccination Program against COVID-19

The Commission services conducted an on-the-spot check on 12 December 2025 (evidence 8), to verify that the appointment creation and management system within the framework of the National Vaccination Program against COVID-19 was expanded (evidence 23). This check was completed successfully, confirming the systems’ expansion to introduce prioritisation capabilities through the creation of two new time slot types: “Light Blue” for non-priority citizens, and “Orange” for appointments that regard citizens under specific priority groups, the administrators’ ability to send free-text SMSs and emails to specific citizens, the new element of transferring the appointments to other vaccination lines or centres, and adding or removing a vaccination centre/line, the addition of the vaccine as a search criterion for vaccination appointments. Additionally, the check confirmed that The Control Tower (Tableau) is expanded to incorporate additional reports.

Greece provided deliverable Π1.2 “Integrated Appointment Management Subsystem & Documentation of Functionality Tests”, (evidence 3), under the Contract titled "Expansion services of the appointment creation and management system, as well as execution of vaccinations within the framework of the National COVID-19 Vaccination Program”, signed on 1 December 2022 between Information Society, under the Ministry of Digital Governance (implementing authority), and the contractor (evidence 1), where the citizen allocation functionalities, available in the users’ (vaccinators, administrators) interface (back office of the web interface “emvolio.gov.gr”) were expanded to include dedicated time slots per vaccination center - “Light Blue” for non-priority citizens, and “Orange” for appointments that regard citizens under specific priority groups, such as individuals with special medical needs. (evidence 3, pages 5 - 7).

Greece demonstrated how the expansion of existing interoperability with the citizen prioritisation system for vaccination from the e-Government Centre for Social Security, under the Ministry of Digital Governance (hereinafter referred to as ‘IDIKA’) was performed. Dedicated Application Program Interfaces (hereinafter referred to as “APIs”) were developed for real-time updates (evidence 3, pages 13-14). Prioritised citizen groups were supplied to the system by IDIKA concerning medical data, while for demographic/personal data, the system interoperates with the General Secretariat for Information Systems (hereinafter referred to as ‘GSIS’).

Greece also demonstrated that the citizen interaction channels for appointment notifications and modifications were expanded (evidence 3, pages 4-7, 11-12, and 14), with the ability to now send “Custom messages via SMS” (evidence 3, pages 7-8) and “Custom messages via email” (evidence 3, pages 11-12). Moreover, the user can now transfer the appointments to other vaccination lines or centres (evidence 3, page 5) and can perform modifications by adding or removing a vaccination centre/line (evidence 3, pages 6-7). The users are also able to assign vaccinators or doctors to multiple vaccination centres (evidence 3, page 9), (evidence 4, section 2).

Greece provided deliverable Π1.4 “Report on audit results (Architecture extension, Amazon Cloud operation configuration & interoperability extensions)” (evidence 5, pages 10-13, sections 3.2.6, 3.2.7, 4, and annex A), where the extension and customisation of the platform infrastructure in the cloud environment (Amazon Cloud) was performed. Initially, launch configurations comprised the older approach, where individual startup configurations for instances were stored separately. In contrast, launch templates represent the new methodology required by Amazon, providing support for new features.

Deliverable Π1.6, “Up-to-date Control Tower reports" section 2 and 3 (evidence 7), underscored the generation of new aggregated data and presentation of statistical metrics and indicators. The Control Tower (Tableau) is expanded to incorporate additional reports: new vaccine analyses, booster dose analyses, vaccinations at home, and certificate analysis.

After the receipt of the aforementioned deliverables under the contract (evidence 1), Information Society SA issued the acceptance protocol, signed on 20 July 2023 (evidence 9), in line with the procedures under Article 168 of Law N.4412/2016 Greek Public Procurement Law which regulates how public authorities buy works, supplies, and services, and relevant approval decision, issued on 27 July 2023 by Information Society (evidence 10).

2. Infrastructure upgrade of the Electronic Prescription System

Upgrade of infrastructure’s software

The Commission services conducted an on-the-spot check on 16 December 2025 (evidence 24), to verify that 1) the doctors, out of the total group of users (doctors, pharmacists, diagnostic centres, midwives) can access the new, upgraded User Interface (UI), 2) the upgraded Electronic Prescription Website with WordPress platform, and 3) the upgraded BI tools (IBM Cognos Analytics). This check was completed successfully, confirming the upgrade of the aforementioned elements of the Electronic Prescription System.

Greece demonstrated that the upgrade of the Electronic Prescription System has been delivered, under the contract titled “Infrastructure Upgrade of the Electronic Prescription System”, signed on 12 December 2023 (evidence 11), between IDIKA (the implementing authority) and the contractor.

The project included an upgrade and extension of the existing Oracle database software licenses, as well as the Oracle data synchronisation software (Oracle Database Enterprise Edition, Oracle Real Application Clusters, Oracle Partitioning, Oracle Advanced Security, Oracle GoldenGate) presented in deliverable ΠΒ.1 “Software Licenses Delivery” (evidence 13, section 1.2, 7.2.3.3, and page 13). The upgrade of the application, web, and reporting services’ software was performed through the upgrade and expansion of Oracle WebLogic and related software licenses (evidence 13, section 1.2, 7.2.3.4 and page 13), (evidence 17, pages 11-12)). The project also included the upgrade and extension of the existing Oracle Web Tier web service software licenses of the user interface (hereinafter referred to as “UI”) of the electronic prescription system’s application (evidence 13, section 1.2, 7.2.3.4 and page 13), (evidence 17, page 6, 11-12, pages 25–27). The project delivered the installation and configuration of Oracle Coherence Grid Edition distributed in-memory data caching software licenses to enhance the performance of the UI of the electronic prescription system’s application (evidence 13, section 1.2, 7.2.3.4 and page 13), (evidence 17, pages 12-23).

During the project, HDIKA SA completed the upgrade and extension of existing interoperability software licenses, specifically for Oracle Service – Oriented Architecture (hereinafter referred to as “SOA”) Suite and Oracle WebLogic Suite, which support API – based solutions, in order for patients’ data to be transferred from IDIKA to the system (evidence 13, section 1.2, 7.2.3.5 and page 13), (deliverable ΠΓ.4: “Report on the adaptation of existing prescription application systems” (evidence 18, pages 12-16)).

The project upgraded and delivered the extension of the existing Oracle BI Publisher report generation software licenses, to ensure compatibility with the latest Oracle technologies and to improve the system’s performance (evidence 13, section 1.2, 7.2.3.4 and page 13).

The upgrade and extension of user authentication and access rights software licenses for IBM Security Identity Manager and IBM Security Access Manager were delivered under the project (evidence 13, section 1.2, 7.2.3.6 and page 8). The project involved acquiring software licenses (VMware vSphere 7 Standard and VMware vCenter Server 7 Standard) to run and manage multiple virtual machines on physical servers for virtualisations (evidence 13, section 1.2, 7.2.3.1 and page 11). New Oracle Linux Basic and Premier Limited licenses were provided to support the upgraded server infrastructure (evidence 13, section 1.2, 7.2.2.1 and pages 10). The project delivered the upgrade and expansion of the existing backup system (IBM Spectrum Protect) and the deployment of IBM Spectrum Protect Suite (evidence 13, section 1.2, 7.2.3.2 and page 8). The upgrade and expansion of the business intelligence environment for the Electronic Prescription System are based on the deployment of IBM Cognos Analytics (evidence 13 section 1.2, 7.2.3.7 and page 8). The upgrade of the security event collection and processing system for the Electronic Prescription System is finalised through the deployment of the IBM QRadar SIEM solution (evidence 13, section 1.2, 7.2.3.8 and page 8).

The upgrade the existing user and administrator incident management system (Trouble Ticket) is delivered by supplying a new, suitable help desk management and monitoring system through the acquisition of IBM Maximo IT and IBM Maximo Application Suite licenses (evidence 13, section 1.2, 7.2.3.9 and page 8).

The upgrade of the Electronic Prescription Website was accomplished through the new WordPress platform, to enhance user experience through improved design, accessibility, and multilingual support (evidence 13, section 1.2, 7.2.3.10 and page 9), (evidence 18, page 4).

Greece also deployed Zabbix, a modern and scalable monitoring tool which enables real-time performance tracking, proactive alerting, and detailed reporting (evidence 13, section 1.2, 7.2.3.11 and page 12).

For the overall installation of software upon delivery, Greece provided Deliverable ΠΓ.1: “Documentation of Equipment Installation and Ready-to-Use Software” (evidence 15, pages 5-7) which documents the successful installation of all aforementioned software.

Upgrade of infrastructure’s hardware and equipment

Greece demonstrated that the infrastructure’s hardware was upgraded under the implementation of the contract (evidence 11). The upgrade of the database management infrastructure focuses on the enhancement of both hardware and equipment components.

The upgrade of computing resources for the Electronic Prescription System was accomplished through new Lenovo ThinkSystem SR630 V2 servers (53 servers for virtualization and two servers dedicated to backup operations) as presented in deliverable ΠΒ.2: “Equipment Delivery” (evidence 14, section 1.2, 7.2.2.1, 7.2.2.4).

The upgrade of the storage system of the Electronic Prescription System was performed through advanced IBM FlashSystem storage solutions for high-speed disk-based backups, enhancing the system’s capacity and performance (evidence 14, section 1.2, 7.2.2.2, 7.2.2.5). Additionally, Greece deployed two TS4300 Tape Library systems for long-term and secure data archiving (evidence 14, section 1.2, 7.2.2.6).

The upgrade of the network infrastructure for the Electronic Prescription System was accomplished through advanced central switches (Cisco Nexus 9300 series switches) and load balancing systems (FortiADC-4200F Application Delivery Controllers) to ensure efficient load balancing (evidence 14, section 1.2, 7.2.2.7, 7.2.2.11).

The upgrade of network security equipment for the Electronic Prescription System was accomplished through advanced firewalls (FortiGate-3400E Unified Threat Protection firewalls) and web application firewalls (WAFs) (FortiWeb-4000F), enhancing the system’s protection against cyber threats (evidence 14, section 1.2, 7.2.2.9, 7.2.2.10).

For the overall installation of hardware and equipment upon delivery, Greece provided Deliverable ΠΓ.1: “Documentation of Equipment Installation and Ready-to-Use Software” (evidence 15, pages 8-16) which documents the successful installation of all aforementioned hardware and equipment.

Alongside with the upgrade of the main site with the required software and equipment, Greece demonstrated that the upgrades also for the disaster recovery (hereinafter referred to as “DR”) site are completed, such as Domain Name System (hereinafter referred to as “DNS”) updates, database switchover, application redeployment, and connectivity checks, as demonstrated in Deliverable ΠΕ.4 “Disaster Recovery Plan” (evidence 22).

Greece demonstrated that the upgraded Electronic Prescription System is finalised and operational with deliverable ΠΣΤ.1: "Results of the full trial period (optimizations and corrections of errors in hardware and application)" (evidence 22), where all errors identified during the trial operation were corrected by the implementation team, which confirmed the system's readiness to enter the production phase.

After the receipt of the aforementioned deliverables under the contract (evidence 11), HDIKA SA issued the acceptance protocol of the aforementioned deliverables (evidence 12-22), signed on 25 February 2025 (evidence 23), in line with the procedures under Article 168 of Law N.4412/2016 Greek Public Procurement Law which regulates how public authorities buy works, supplies, and services, marking the successful completion and approval of system upgrades by the implementing authority.

4. Commission Preliminary Assessment: Satisfactory fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Target: 170 NHS Infrastructure upgrade completion – step 1

Related Measure: 3,3.16795 Health infrastructure

Quantitative Indicator: 9.

Time: Q4 2025

1. Context:

The objective of the measure is to renovate infrastructure and tools necessary for better provision of health services. The measure consists of hospitals throughout Greece being renovated and/or constructed (including with energy efficiency works), and medical equipment delivered.

Target 170 requires the renovation and/or construction works for a total of nine hospitals.

Target 170 is the first milestone of the investment. It will be followed by targets 170a, 170b, 170c, 170d related to the renovation and/or construction works for other hospitals and milestone 170e related to the delivery of medical equipment.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary note	A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Annex table of list of hospitals	The Annex Table documents information on the nine renovated hospitals
3	Copy of the Certificate of completion for the project “Repair and renovation of the building infrastructure of the **General Hospital of Samos ‘Agios Panteleimon’** and the **General Hospital of Ikaria**” Ref. No.: ETY/47172	Certificate of completion certifying the completion of works issued by the head of the Single Technical Service of the 2nd Regional Health Authority and dated 23 July 2025, with report from supervising engineers
4	Copy of the Certificate of completion for the project “Site Renovation Works at the **Florina General Hospital**” Ref. No.: 2067	Certificate of completion certifying the completion of works issued by the head of the Single Technical Service of the 3rd Regional Health Authority and dated 13 January 2025, with report from supervising engineers
5	Copy of the Certification of completion for the Project “Refurbishment of various sections and upgrading electromechanical installations of the **‘Agios Pavlos’ General Hospital**” Ref. No.: 11849	Certificate of completion certifying the completion of works issued by the head of the Single Technical Service of the 4th Regional Health Authority and dated 10

		March 2025, with report from supervising engineers
6	Copy of the Certificate of completion for the project “Renovation – reconstruction of sanitary facilities (bathrooms – WC) and modernisation of hospital units of the General Hospitals of Tzanio, Metaxa General Hospital of Athens, Attiko General Hospital and **Psychiatric Hospital**” Ref. No.: ETY/16627	Certificate of completion certifying the completion of works issued by the head of the Single Technical Service of the 2nd Regional Health Authority and dated 14 March 2025, with report from supervising engineer
7	Copy of the Certificate of completion for the project “Renovation of W.C. and W.C. people with disabilities & replacement of false ceilings/luminaires in various areas of **Karpenisi General Hospital**” Ref. No: 103225	Certificate of completion certifying the completion of works issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority and dated 29 November 2024, with report from supervising engineers
8	Copy of the Certificate of completion for the project “Renovation/refurbishment of infrastructure at **Trikala General Hospital**” Ref. No.: 33238	Certificate of completion certifying the completion of works issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority and dated 15 April 2025, with report from supervising engineer
9	Copy of the Certificate of completion for the project “Reconstruction – Renovation – Upgrading of the Emergency Department at the General Hospital of Lamia” Ref. No.: 57521	Certificate of completion certifying the completion of works issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority and dated 04 July 2025, with report from supervising engineers
10	Copy of the Certificate of completion for the project "Construction of a new building with an auditorium for the expansion of the Oncology Clinic and the integration of the new Radiotherapy Center, including the Nuclear Medicine Department at Lamia General Hospital" Ref. No: 89683	Certificate of completion certifying the completion of works issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority and dated 17 October 2025, with report from supervising engineers
11	Copy of the Certificate of completion for the project “Refurbishment/upgrading of infrastructure in three hospitals of the 5th Health Region: **Livadia General Hospital**, Thiva General Hospital, Karditsa General Hospital” Ref. No.: 91659	Certificate of completion certifying the completion of works issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority and dated 24 October 2025, with report from supervising engineers

3. Analysis:

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

Renovation and/or construction works for a total of nine hospitals.

For the purposes of this milestone, the Greek authorities provided evidence for nine hospitals (evidence 2) issued in line with the procedures under Article 168 of Law N.4412/2016 Greek Public Procurement Law which regulates how public authorities buy works, supplies, and services.
For **General Hospital of Samos 'Agios Panteleimon'** and **General Hospital - Health Centre of Ikaria**: A Certificate of completion was issued by the head of the Single Technical Service of the 2nd Regional Health Authority based on the report from the supervising engineers (both in evidence 3). The Certificate of completion confirms the completion of the works of the project “Repair and renovation of the building infrastructure of the General Hospital of Samos ‘Agios Panteleimon’ and the General Hospital of Ikaria”.

For **General Hospital of Florina**: A Certificate of completion was issued by the head of the Single Technical Service of the 3rd Regional Health Authority based on the report from the supervising engineers (both in evidence 4). The Certificate of completion confirms the completion of the works of the project “Site Renovation Works at the Florina General Hospital”.

For **General Hospital of Thessaloniki 'Agios Pavlos'**: A Certificate of completion was issued by the head of the Single Technical Service of the 4th Regional Health Authority based on the report from the supervising engineers (both in evidence 5). The Certificate of completion confirms the completion of the works of the project “Refurbishment of various sections and upgrading electromechanical installations of the ‘Agios Pavlos’ General Hospital”.

For **Psychiatric Hospital of Attica**: A Certificate of completion was issued by the head of the Single Technical Service of the 2nd Regional Health Authority based on the report from the supervising engineer (both in evidence 6). The Certificate of completion confirms the completion of the works of the project “Renovation – reconstruction of sanitary facilities (bathrooms – WC) and modernisation of hospital units of the General Hospitals of Tzanio, Metaxa General Hospital of Athens, Attiko General Hospital and Psychiatric Hospital”.

For **General Hospital of Karpenisi**: A Certificate of completion was issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority based on the report from the supervising engineers (both in evidence 7). The Certificate of completion confirms the completion of the works of the project “Renovation of W.C. and W.C. people with disabilities & replacement of false ceilings/luminaires in various areas of Karpenisi General Hospital”.

For **General Hospital of Trikala**: A Certificate of completion was issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority based on the report from the supervising engineers (both in evidence 8). The Certificate of completion confirms the completion of the works of the project “Renovation/refurbishment of infrastructure at Trikala General Hospital”.

For **General Hospital of Lamia**: A Certificate of completion was issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority based on the report from the supervising engineers (both in evidence 9). The Certificate of completion confirms the completion of the works of the project “Reconstruction – Renovation – Upgrading of the Emergency Department at the General Hospital of Lamia”. An additional Certificate of completion was issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority based on the report from the supervising engineers (both in evidence 10). The Certificate of completion confirms the completion of the works of the project "Construction of a new building with an auditorium for the expansion of the Oncology Clinic and the integration of the new Radiotherapy Center, including the Nuclear Medicine Department at Lamia General Hospital".

For **General Hospital of Livadia**: A Certificate of completion was issued by the deputy head of the Single Technical Service of the 5th Regional Health Authority based on the report from the supervising engineers (both in evidence 11). The Certificate of completion confirms the completion of the works of the project “Refurbishment/upgrading of infrastructure in three hospitals of the 5th Health Region: Livadia General Hospital, Thiva General Hospital, Karditsa General Hospital”.

4. Commission Preliminary Assessment: Satisfactorily fulfilled**.**

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 175 Social Benefits Optimisation pre-paid cards

Related Measure: 3,4.16726 Social Benefits Optimisation

Qualitative Indicator: Issuance of prepaid cards for the payment of social benefits provided by these two services

Time: Q4 2024

1. Context:

The objective of the reform is to optimise the transfer of social benefits through the use of prepaid cards. It consists of the following components: 1) The introduction of prepaid cards for the payment of the majority of social benefits provided by the Single Welfare Benefits Payment Authority (hereinafter referred to as "OPEKA") and the Public Employment Service (hereinafter referred to as "DYPA"), 2) The provision of incentives to beneficiaries for using prepaid cards for the purchase of goods and services.

Milestone 175 requires the issuance of prepaid cards for the payment of the majority of social benefits provided by the Single Welfare Benefits Payment Authority (OPEKA) and the Public Employment Service (DYPA).

Milestone 175 is the second and last milestone of the reform, and it follows the completion of milestone 175a, related to the entry into force of legal acts providing incentives to beneficiaries for using prepaid cards for the purchase of goods and services.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	The summary document duly justifies how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Report by OPEKA Protocol Number: 5419/11.08.2025	The report attests the completion of the introduction of prepaid cards for the payment of social benefits under Article 152 of Law 5078/2023 and Joint Ministerial Decision No. 3511 (Official Journal B' 1177/12.03.2025).
3	Report by DYPA Protocol Number: 711832/26.08.2025	The report attests the completion of the introduction of prepaid cards for the payment of social benefits under Article 152 of Law 5078/2023 and Joint Ministerial Decision No. 3511 (Official Journal B' 1177/12.03.2025).

4	Law 5078/2023 (Official Gazette A’ 211/20 December 2023)	The law in its Article 152 establishes the primary legislative framework for the issuance of prepaid cards for the payment of social benefits.
5	Joint Ministerial Decision No. 3511 Government Gazette Issue (FEK) No 1177/B/12 March 2025	The Joint Ministerial Decision, signed by the Ministries of Economy and Finance, Labour and Social Security, Social Cohesion and Family Affairs, and Digital Governance, regulates matters concerning the disbursement of social benefits through prepaid cards – Special Public Lottery Program, in accordance with Articles 152 and 154 of Law 5078/2023.
6	Request letter from the Hellenic Bank Association	The letter from the Hellenic Bank Association requests from the participating banks to certify the number of issued pre-paid cards.
7	Letter from National Bank of Greece	The letter certifies the number of pre-paid cards issued by the National Bank of Greece between the launch of the programme and 30 November 2025.
8	Letter from Alpha Bank	The letter certifies the number of pre-paid cards issued by Alpha Bank between the launch of the programme and 30 November 2025.
9	Letter from Eurobank	The letter certifies the number of pre-paid cards issued by the Eurobank between the launch of the programme and 30 November 2025.
10	Letter from Piraeus Bank	The letter certifies the number of pre-paid cards issued by Piraeus Bank between the launch of the programme and 30 November 2025.
11	On-the-spot check conducted by the Commission services on 12 March 2026.	This meeting was conducted as on-the-spot control as provided by Article 6(4) of the Financing Agreement, in order to verify that the prepaid card application system established by amended Law 5078/2023 is linked to the issuance of the prepaid cards for the payment of the social benefits by OPEKA and DYPA.
12	Screenshot of a beneficiary’s account from the Birth Benefit Platform	The screenshot certifies that a certain person is beneficiary of the birth benefit.
13	Screenshot of the same beneficiary’s account from the prepaid card application system attesting the approval of the application for the issuance of a prepaid card	The screenshot certifies that the application for a prepaid card for the same beneficiary as above has been approved.

14	Screenshot of a credit file from OPEKA's IT system sent to DIAS INTERBANKING SYSTEMS S.A. for the payment of benefits to the beneficiaries' prepaid cards	The screenshot is a proof of transfer of benefits from OPEKA to the beneficiaries' prepaid cards through DIAS INTERBANKING SYSTEMS S.A., which includes the name of the same beneficiary as above.

3. Analysis:

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

Issuance of prepaid cards for the payment of the majority of social benefits provided by the Single Welfare Benefits Payment Authority (OPEKA) and the Public Employment Service (DYPA). Furthermore, in line with the description of the measure, **the measure consists of the introduction of prepaid cards for the payment of the majority of social benefits.**

According to Article 152 of Law 5078/2023 (evidence 3), the majority of the allowances, benefits, grants, and all types of monetary provisions granted by OPEKA and DYPA are to be credited to a special prepaid card issued specifically for each individual.

Following the mandated stipulated in Law 5078/2023, as amended by Article 23 of Law 5178/2025, OPEKA (evidence 2) completed the introduction of prepaid cards for the payment of the majority of the social benefits (based Article 152(4) of Law 5078/2023). Concretely, from the introduction of the prepaid cards system on 15 March 2025 through 30 May 2025, the social benefits distributed by OPEKA were paid via prepaid cards, as follows: Guaranteed Minimum Income; Foster Care Allowance; Birth Allowance; Child Benefit, which represents the majority of the social benefits manged by OPEKA. Equally, DYPA (evidence 3) completed of the introduction of prepaid cards for the payment of the following social benefits distributed (based on Article 152(4) of Law 5078/2023): Regular Unemployment Benefit; Exclusive Nurses Benefit, Tour Guides Benefit; Forestry Workers Benefit, Removal/Discontinuation of Slaughterhouse Operations; Special Benefit for Slaughterhouse Workers, Special Supplementary Unemployment Benefit for Dockworkers, Long-Term Unemployed Benefit, Unemployment Benefit for Self-Employed and Independent Workers (former E.T.A.A., O.A.E.E., former E.T.A.P.-MME), Special Benefit for Vulnerable Groups, Special Seasonal Benefits, Work Benefit, Special Maternity Protection Benefit, Supplementary Maternity Benefit, and Parental Leave Benefit, which represents the majority of the social benefits manged by DYPA.

Moreover, Article 23 of Law 5178/2025, amending Article 152 of Law 5078/2023, establishes the development and operation of an Integrated Information System (hereinafter referred to as "IIS") within the Ministry of Social Cohesion and Family Affairs which ensures the interoperability with DYPA and OPEKA systems, as well as that interoperability with payment service providers (Banks) through the DIAS INTERBANKING SYSTEMS S.A. Within this system, DYPA and OPEKA sends to DIAS INTERBANKING SYSTEMS S.A. the payment order for the benefits to be paid to the beneficiaries' prepaid cards (evidence 14).

The Commission conducted an on-the-spot check on 12 March 2026 to verify the introduction and issuance of prepaid cards for the payment of social benefits provided by OPEKA and DYPA. The Commission services verified the system established by amended Law 5078/2023 for the issuance of the prepaid cards for the payment of the social benefits by OPEKA and DYPA. The following elements were verified: i) the prepaid card application system attesting the approval of the application for the issuance of a prepaid card and its validation in the IIS (evidence 12 & 13); iii) the payment of the social benefits from OPEKA and DYPA to beneficiaries on the pre-paid cards, via the DIAS INTERBANKING SYSTEMS S.A, i.e. the system with interoperability with payment service providers (Banks) (evidence 14). The aforementioned checks were completed successfully, confirming that the prepaid card application system established by amended Law 5078/2023 is linked to the issuance of the prepaid cards for the payment of the social benefits by OPEKA and DYPA.

The introduction and issuance of prepaid cards for beneficiaries of OPEKA and DYPA is further confirmed by letters from the four systemic banks in Greece, namely the National bank of Greece (evidence 7), Alpha Bank (evidence 8), Eurobank (evidence 9), and Piraeus Bank (evidence 910, in reply to a letter from the Hellenic Bank Association (evidence 6) requesting banks participating in the program under Law 5078/2023 to state the total number of prepaid cards each had issued from the launch of the Program until 30 November 2025. These banks certified the issuance of 1,106,222 prepaid cards in total between March 2025, and 30 November 2025, as follows:

- The National Bank of Greece (evidence 7) certifies that during the abovementioned period it has issued 502,372 new prepaid cards. It further states that for beneficiaries who already held active prepaid cards for the Minimum Guaranteed Income (formerly KEA), no new cards were issued; instead, the existing cards were reconfigured in accordance with the provisions of the relevant law. Although the reply from the National Bank of Greece does not explicitly refer to Law 5078/2023, it states that it responds to the Hellenic Bank Association's letter dated 23 January 2026 (evidence 6) and is therefore considered to be linked to milestone 175.

- Alpha Bank (evidence 87) certifies that during the abovementioned period it has issued 153,219 prepaid cards.

- Eurobank (evidence 98) certifies that during the abovementioned period it has issued 171,367 prepaid cards.

- Piraeus Bank (evidence 109) certifies that during the abovementioned period it has issued 279,264 new prepaid cards. It further states that for beneficiaries who already held active prepaid cards for the Minimum Guaranteed Income, the existing cards were reconfigured in accordance with the provisions of the relevant law.

Based on the above, it is considered that Milestone 175 has been fulfilled with the issuance of prepaid cards for the payment of the majority of social benefits provided by OPEKA and DYPA.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 176 Completion of second phase personal assistance disability assessment

Related Measure: 3,4. 16904 Disability

Qualitative Indicator: Personal assistants assigned for at least 1500 beneficiaries.

Time: Q4 2024

1. Context:

The reform consists of two sub-projects aiming at enhancing social inclusion, independent living, employability and early childhood intervention for persons with disabilities. These subprojects notably pertain to a) enhancing independent living for persons with disabilities b) supporting early childhood interventions (pilot program).

Milestone 176 concerns the assignment of personal assistants for at least 1500 beneficiaries.

Milestone 176 is the second milestone of the reform, and it follows the completion of milestone 174. It will be followed by milestone 179 related to the entry into force of a legal act to enable the nationwide roll-out of the Personal Assistance disability scheme, including medical and functional assessment process and delivery of an evaluation report of the pilot scheme with statistics and recommendations and milestone 174a, related to delivery of infrastructure, signature of contracts and publication of a call to beneficiaries of the national rollout (Personal Assistance disability scheme).

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone including all constitutive elements was satisfactorily fulfilled
2	List of approval decisions	List of approval decisions issued by the Evaluation Committees as defined in JMD 28455/2022.
3	List of Executed Contracts	List of executed contracts between beneficiaries and personal assistants, as extracted from the project platform and verified by the Implementing Body.
4	Confirmation for the delivery of services for personal assistance, of 5 December 2025	Confirmation letter issued by Ministry Social and Family Affairs confirming that the two pilot schemes personal assistants have been assigned for at least 1500 beneficiaries

5	Joint Decision No 28455, Official Journal ΟΔΔ 242/24.3.2022	Joint Decision of the Ministers of Labour and Social Affairs, Finance and Health on ‘the composition, establishment and operation of special multi-disciplinary committees of disability assessment’
6	Sampling documents	60 approval decisions issued by the Evaluation Committees as defined in JMD 28455/2022.
7	Sampling documents	60 contracts between beneficiary and a personal assistant.

3. Analysis:

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

Assignment of personal assistants for at least 1500 beneficiaries, including a disability assessment process by a multi-disciplinary evaluation committee.

The Greek authorities provided evidence confirming that following the projects “SUB1: Actions for the operational functioning of the Independent Living Assistance (B), with code 5165187” and “SUB1: Pilot project for personal assistance to support independent living for people with special needs (B), with code 5168208”, personal assistants have been assigned for at least 1500 beneficiaries (evidence 4). As a result of these projects, a final list of beneficiaries for personal assistants services was selected based on the assessment of a specialized multi-disciplinary Evaluation Committees for disability assessment, as per the Joint Decision of the Ministers of Labour and Social Affairs, Finance and Health No 28455, Official Journal ΟΔΔ 242/24.3.2022 “on ‘the composition, establishment and operation of special multi-disciplinary committees of disability assessment” (evidence 5). Following this assessment each beneficiary engaged in a contract with a personal assistant.

The Greek authorities provided a list of the **approval decisions** by the multi-disciplinary evaluation committees for 1,674 final recipients for personal assistance services (evidence 2). The decision serves as the official basis for granting access to the personal assistance service. Greece also provided a list of **contracts between beneficiaries and personal assistants** (evidence 3). Each contract clearly sets out the terms and conditions governing the provision of the personal assistant service, including the roles and responsibilities of both parties, as well as the agreed duration and scope of the support.

Following the selection of a random sample of 60 units, Greece submitted for each of the 60 beneficiaries of personal assistant services, the **approval decision following the disability assessment by a multi-disciplinary evaluation committee** and the **contract between beneficiary and a personal assistant to prove the assignment of a personal assistant to each beneficiary**. The evidence provided for the sample of 60 units confirmed that the requirements of milestone have been meet.

The analysis of this evidence showed that each element in the sample is aligned with the requirements set out in the CID.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 184 Diversity awareness training completion for employees of private sector businesses

Related Measure: 3,4.16685 Diversity Awareness

Quantitative Indicator: Number of employees in private sector businesses with certified participation to training

Baseline: 0

Target: 80000

Time: Q3 2024

1. Context:

The investment consists of two interconnected subprojects seeking to raise awareness on diversity: a) the development and delivery of diversity training programmes for employees in private sector with the aim of fighting discrimination against all dimensions of diversity in the workplace; and b) the development of a concrete mechanism to collect appropriate statistical data relating to equality and discrimination.

Milestone 184 provides for diversity awareness training certificates issued for 80 000 employees in private sector businesses.

Target 184 is the first step of the implementation of the investment. It will be followed by milestone 184a, related to entry into force of a legal act specifying the role of the Equality Observatory, and legal act providing for the start of a pilot for the evaluation and award system for enterprises/organisations promoting diversity and inclusion.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document	The summary document duly justifies how the milestone (including all the constitutive elements) has been satisfactorily fulfilled
2	Call with Protocol Number: Α.Π.: 10143/09-07-2025	Call inviting employees of Private-Sector Enterprises for their Participation in "Employee awareness program on diversity and the prevention of discrimination in the workplace"

3	List of the individual certificates of attendance proving that the training programmes have been completed	The list of certificates of attendance, issued by the Ministry of Social Cohesion and Family for participants who successfully completed the awareness program according to the Educational Digital Platform
4	Legislative act 4152 Urgent measures to implement Law 4046/2012, 4093/2012 and 4127/2013	Legislative act proving the functioning of the ERGANI information system as an information system set up by the Ministry of Labour, Social Security and Welfare which provides continuous updating and real-time measurement of employment status in the private employed sector of the economy
5	Certificate of Milestone achievement signed by the Ministry of Social Affairs, cohesion and family, Secretariat-General for equality and human rights	Confirmation of achievement of milestone 184 of Action 16685 of Axis 3.4 of the National Recovery and Resilience Plan 'Greece 2.0' of the project entitled 'SUB1 & SUB2: Diversity Awareness Awareness in Workplaces' (MIS Code: MIS5168301).
6	Sampling documents	60 training completion certificates

3. Analysis:

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

Completion of training programme on diversity for 80 000 employees in private sector businesses and certification. The training programme shall be aimed to raise awareness of the various dimensions and benefits of diversity.

On 9 July 2025, the Ministry of Social Cohesion launched a call for application inviting employees of Private-Sector Enterprises for their participation in "Employee awareness program on diversity and the prevention of discrimination in the workplace" (evidence 2). According to section 1 of the call for application, the purpose of the programme was to raise awareness among company employees on issues of diversity and to combat discrimination in the workplace, through participation in interactive e-learning training content with a duration of three (3) hours, appropriately designed and adapted to the target group for the implementation of the programme. The call for applications was managed using the IT platformed called "Diversity Awareness Training Platform".

Furthermore, the Council Implementing Decision required the completion of training programme on diversity for 80 000 employees in private sector businesses and certification. Greece submitted a list of the individual certificates of attendance proving that the training programmes have been completed (evidence 3) for 79 999 participants. Whilst this constitutes a minimal numerical deviation of 0.001% 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.

Moreover, the Commission services conducted an on-the-spot check on 18 February 2026 to verify that the training programme on diversity was done for private sector businesses employees only. Greece illustrated that this condition was met based on the interoperability of the Diversity Awareness Training Platform with the ERGANI information system, set by the Ministry of Labour Social Security and Welfare which registers real-time data on the employment status of person employed in Greek private sector (evidence 4). In particular, the Greek authorities illustrated that based on the Tax Identification Number, the condition for a person to be employed in a private sector businesses were automatically checked in the application process, and a person not registered as private sector employee could not apply for the training. This check was completed successfully, confirming that the aforementioned requirement is satisfactorily fulfilled.

Following the selection of a random sample of 60 units, Greece submitted 60 training completion certificates for the training programme on diversity. The evidence provided for a sample of 60 units confirmed that the requirement of the milestone has been met.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 195a Delivery of i) an integrated information system for IAPR's General Directorate for Financial Services and ii) office hardware and portable IT equipment for IAPR
Related Measure: 4,1.16291 Digital Transformation of the Tax and Customs Administration

Qualitative Indicator: Delivery of the two sub-projects.

Time: Q4 2024

1. Context:

The investment supports the digital transformation of Greece's Independent Authority for Public Revenue, hereinafter referred to as "IAPR" and improving its overall performance. It brings together a set of digital infrastructure sub-projects covering the replacement of core digital systems, automation of internal processes, digitalization of audits and controls, and the upgrade of taxpayer services, including enhanced interoperability with bank data information systems.

In particular, the following sub-projects shall be delivered for milestone 195a: under the intervention area "Replacement of core digital systems, renewing obsolete infrastructure and expanding functionality of service provision," an integrated information system for IAPR's General Directorate for Financial Services; and under the intervention area "Automation of office and work processes," equipment supply for IAPR.

Milestone 195a is the first step of the implementation of the investment. It will be followed by milestone 195, related to the delivery of the first phase deliverables of the integrated IT environment as well as subprojects as part of IAPR's digital transformation. The investment has a final expected date for implementation of Q4/2025.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled	
2	Tender notice) issued by the IAPR as Contracting Authority 22PROC010612227 2022-05-24 (with protocol number Δ.Π.Κ.Υ. Α.Α.Δ.Ε. Α2 1044330 ΕΞ 2022/17.05.2022	Tender notice for the implementation of the Integrated Information System services for the needs of the General Directorate of Financial Services (GDFS) of the Independent Authority for Public Revenue (IAPR)
3	Contract 600/2023 signed between the IAPR as Contracting Authority and the company "Services of Open Technology" (with electronic	Contract for the procurement of services concerning the implementation of an Integrated Information System for the needs of the IAPR's GDFS

	signature: 23SYMV012891687 2023-06-16)	
4	IAPR Governor's Decision for extension of the duration of the contract (electronically signed under 24SYMV014377990 2024-03-06 with protocol number protocol number: Δ.Π.Κ.Υ. Α.Α.Δ.Ε. Α2 1028504 ΕΞ 2024)	IAPR Governor's Decision approving the time extension of the contract by 3 months
5	Protocol of final receipt of the object of contract 600/2023 with protocol number 1057623/20-05-2024 by virtue of Decision of the IAPR Committee set up for the monitoring and delivery of the Integrated IT System of the GDFS of the IAPR Acceptance Protocol	Acceptance Protocol signed by the Monitoring & Delivery Committee of the IAPR
6	Acceptance of delivery of the scope of contract 600/2023 by virtue of decision of the Governor of the IAPR with protocol number Δ.Π.Κ.Υ. Α.Α.Δ.Ε. Α2 1056671 ΕΞ 2024 dated 17.5.2024	IAPR Governor's Decision Approving the delivery of the project outcomes
7	Framework Agreement 3/GGE/2020 (20SYMV007407741 2020-10-01)	A Framework Agreement signed by the General Secretariat for Commerce as Contracting Authority for the purchase of 10.500 PCs for IAPR and 3.000 PCs for GSIS
8	Operational Agreement 6803/2021 signed by the Secretary General for trade and consumer protection (22SYMV009940328 2022-01-19)	Operational Agreement based on the Framework Agreement 3/GGE/2020 for the purchase of 3.111 Personal Computers with Led monitors
9	Equipment Acceptance Protocol 1016127/ 3-2-2023 signed by the IAPR	Equipment Acceptance Protocol for Operational Agreement 6803/2021
10	Operational Agreement 6806/2021 signed by the Secretary General for trade and consumer protection (22SYMV009941276 2022-01-19)	Operational Agreement 6806/2021 based on the Framework Agreement 3/GGE/2020 for the purchase of 4.384 Personal Computers with Led monitors
11	Equipment Acceptance Protocol 1016118/ 3-2-2023 signed by the IAPR	Equipment Acceptance Protocol for Operational Agreement 6806/2021
12	Operational Agreement 6808/2021 signed by the Secretary General for trade and consumer protection (22SYMV009941351 2022-01-19)	Operational Agreement 6808/2021 based on the Framework Agreement 3/GGE/2020 for the purchase of 805 Personal Computers with Led monitors

13	Equipment Acceptance Protocol 1016120/ 3-2-2023 signed by the Secretary General for trade and consumer protection	Equipment Acceptance Protocol for Operational Agreement 6808/2021
14	Operational Agreement 6937/2023 signed by the Secretary General for trade and consumer protection (23SYMV013986560 2023-12-18)	Operational Agreement 6937/2023 based on the Framework Agreement 3/GGE/2020 for the purchase of 2.200 Personal Computers with Led monitors
15	Equipment Acceptance Protocol 1124842/ 5-11-2024 signed by the IAPR	Equipment Acceptance Protocol for Operational Agreement 6937/2023
16	Contract 771/2024 signed between the IAPR as Contracting Authority and the company "Technicomer" (under number 24SYMV014925231 2024-06-12-)	Contract for the purchase of 1500 Laptops
17	Equipment Acceptance Protocol 1142706/ 13-12-2024 signed by the IAPR	Equipment Acceptance Protocol for Contract 771/2024 (1500 Laptops)
18	Contract 772/2024 signed between the IAPR as Contracting Authority and company "CPI" (with protocol number 24SYMV014925403 2024-06-12)	Contract for the purchase of 1700 QR Code canners
19	Equipment Acceptance Protocol 1124395/ 4-11-2024 signed by the IAPR	Equipment Acceptance Protocol for Contract 772/2024 (1700 QR Code canners)
20	Contract 962/2025 signed between the IAPR as Contracting Authority and the company "Technicomer" (25SYMV016755762 2025-05-06)	Contract for the purchase of 835 All In One Personal Desktop Computers
21	Equipment Acceptance Protocol 278794/ 15-10-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 962/2025 (835 All In One Computers)
22	Contract 949/2025 signed between the IAPR as Contracting Authority and the company "Plaisio Computers" (25SYMV016622809 2025-04-09)	Contract for the purchase of 11.000 Monitors
23	Equipment Acceptance Protocol 302273/ 23-10-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 949/2025 (11.000 Monitors)

24	Contract 940/2025 signed between the IAPR as Contracting Authority and company "Cosmodata 2" (25SYMV016552186 2025-03-31)	Contract for the purchase of 8.500 Headsets, 500 High-Definition Cameras and 150 Mobile Printers/scanners
25	Equipment Acceptance Protocol 344452/ 10-11-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 940/2025 (8.500 Headsets)
26	Equipment Acceptance Protocol 344497/ 10-11-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 940/2025 (500 High Definition Cameras)
27	Equipment Acceptance Protocol 344471/ 10-11-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 940/2025 (150 Mobile Printers/scanners)
28	Contract 1017/2025 signed between the IAPR as Contracting Authority and company "NEXT GEN RETAIL SERVICES" (25SYMV017338392 2025-08-04)	Contract for the purchase of 5.500 Cordless Keyboards/ Mousses and 3000 Docking Stations for Laptops
29	Equipment Acceptance Protocol 404347/28-11-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 1017/2025 (5.500 Cordless Keyboards/Mousses)
30	Equipment Acceptance Protocol 406079/02-12-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 1017/2025 (3000 Docking Stations for Laptops)
31	Contract 1057/2025 signed between the IAPR as Contracting Authority and company "EPAFOS" (25SYMV017613294 2025-09-25)	Contract for the purchase of 300 tablets
32	Equipment Acceptance Protocol 352941/12-11-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 1057/2025 (300 tablets)
33	Contract 943/2025 signed between the IAPR as Contracting Authority and company "EPAFOS" (25SYMV016571344 2025-04-02)	Contract for the purchase of 200 projectors
34	Equipment Acceptance Protocol 284869/ 17-10-2025 signed by the IAPR	Equipment Acceptance Protocol for Contract 943/2025 (200 projectors)

3. Analysis:

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

In line with the description of the measure, **this investment consolidates digital infrastructure sub-projects to be implemented by IAPR, classified into four intervention areas: 1) Replacement of core digital systems and expansion of the functionality of service provision […]; 2) Automation of office and work processes.**

The following sub-projects shall be delivered:

- **Under the intervention area "Replacement of core digital systems, renewing obsolete infrastructure and expanding functionality of service provision": Integrated information system for IAPR's General Directorate for Financial Services.**

As regards the first requirement concerning the delivery and operation of the Integrated information system for the Independent Authority of Public Revenue (IAPR)'s General Directorate for Financial Services (GDFS), the authorities have provided sufficient evidence according to national legislation (Law 4412/2016 on Public Works, Supplies and Services Contracts) including:

i) Tender notice 22PROC010612227 2022-05-24 (with protocol number Δ.Π.Κ.Υ. Α.Α.Δ.Ε. Α2 1044330 ΕΞ 2022/17.05.2022- evidence 2) issued by the IAPR as Contracting Authority describing the scope of the services procured. Concretely, the tender notice described in detail the functionalities of the GDFS' integrated information system including interoperability requirements and the following sub-systems: the sub-system of the national budget management; sub-system of the public investment budget management; sub-system of financial management; sub-system of invoices management; sub-system of services procurement management (tender notice-evidence 2, pages 83 et sec).
ii) Contract 600/2023 signed between the IAPR as Contracting Authority and the company "Services of open technology S.A." as contractor on 16.6.2023 (evidence 3) providing the scope of the services procured (contract 600/2023, article 1). The contract's duration was extended up until 15.3.2024 by virtue of the IAPR's Governor Decision under protocol number Δ.Π.Κ.Υ. Α.Α.Δ.Ε. Α2 1028504 ΕΞ 2024 (evidence 4).
iii) Protocol of final receipt of the object of contract 600/2023 by virtue of Decision of the IAPR Committee set up for the monitoring and delivery of the Integrated IT System of the GDFS of the IAPR (protocol number 1057623/20.5.2024- evidence 5).
iv) Acceptance of delivery of the scope of contract 600/2023 by virtue of decision of the Governor of the IAPR with protocol number Δ.Π.Κ.Υ. Α.Α.Δ.Ε. Α2 1056671 ΕΞ 2024 dated 17.5.2024 (evidence 6).

- **Under intervention area "Automation of office and work processes": Equipment supply for IAPR.**

As regards the second requirement concerning the operationalization of equipment supply for IAPR, the authorities have provided sufficient evidence for the procurement and delivery of the relevant equipment.

i) For demonstrating the delivery of personal computers with the LED monitors, the authorities have provided the following evidence:
   a) Framework agreement 3/GGE/2020 (with protocol number 20SYMV007407741 2020-10-01- evidence 7) signed by the General Secretariat for Commerce as Contracting Authority for the purchase of 10.500 personal computers which was implemented through 4 operational agreements and acceptance of equipment:
      - Operational Agreement 6803/2021 (with protocol number 22SYMV009940328 2022-01-19 - evidence 8) for the purchase by the IAPR of 3.111 Personal

Computers with Led monitors followed by the Equipment Acceptance Protocol 1016127/ 3-2-2023 (evidence 9) for Operational Agreement 6803/2021.

- Operational Agreement 6806/2021 (with protocol number 22SYMV009941276 2022-01-19 – evidence 10) for the purchase by the IAPR of 4.384 Personal Computers with Led monitors followed by the Equipment Acceptance Protocol 1016118/ 3-2-2023 (evidence 11) for Operational Agreement 6806/2021.
- Operational Agreement 6808/2021 (with protocol number 22SYMV009941351 2022-01-19 – evidence 12) for the purchase by the IAPR of 805 Personal Computers with Led monitors Equipment followed by the Equipment Acceptance Protocol 1016120/ 3-2-2023 (evidence 13) for Operational Agreement 6808/2021.
- Operational Agreement 6937/2023 (with protocol number 23SYMV013986560 2023-12-18 – evidence 14) for the purchase by the IAPR of 2.200 Personal Computers with Led monitors followed by the Equipment Acceptance Protocol 1124842/ 5-11-2024 (evidence 15) for Operational Agreement 6937.

ii) As regards the provision of laptops, the authorities have submitted Contract 771/2024 signed between the IAPR as Contracting Authority and the company "Technicomer" (with protocol number 24SYMV014925231 2024-06-12- evidence 16) for the purchase of 1500 Laptops followed by the Equipment Acceptance Protocol 1142706/ 13-12-2024 (evidence 17) for Contract 771/2024, demonstrating that the laptops were delivered.

iii) As regards the provision of QR scanners, the authorities have submitted Contract 772/2024 signed between the IAPR as Contracting Authority and company "CPI" (with protocol number 24SYMV014925403 2024-06-12- evidence 18) for the purchase of 1700 QR Code scanners followed by the Equipment Acceptance Protocol 1124395/ 4-11-2024 (evidence 19) for Contract 772/2024, demonstrating that the QR scanners were delivered.

iv) As regards the provision of all-in-one personal desktop computers, the authorities have submitted Contract 962/2025 between the IAPR as Contracting Authority and the company "Technicomer" (with protocol number 25SYMV016755762 2025-05-06- evidence 20) for the purchase of 835 all-in-one personal desktop computers followed by the Equipment Acceptance Protocol 278794/ 15-10-2025 (evidence 21) for Contract 962/2025 demonstrating that the all-in-one personal desktop computers were delivered.

v) As regards the purchase of monitors, the authorities have submitted Contract 949/2025 signed between the IAPR as Contracting Authority and the company "Plaisio Computers" (with protocol number 25SYMV016622809 2025-04-09 – evidence 22) for the purchase of 11.000 monitors followed by Equipment Acceptance Protocol 302273/ 23-10-2025 (evidence 23) for Contract 949/2025 demonstrating that the monitors were delivered.

vi) As regards the purchase of headsets, high-definition cameras and mobile printers/scanners, the authorities have submitted Contract 940/2025 signed between the IAPR and company "Cosmodata 2" (with protocol number 25SYMV016552186 2025-03-31 – evidence 24) for the purchase of 8.500 headsets, 500 high-definition cameras and 150 mobile printers/scanners followed by the Equipment Acceptance Protocol 344452/ 10-11-2025 (evidence 25) concerning the delivery of8.500 headsets, the Equipment Acceptance Protocol 344497/ 10-11-2025 (evidence 26) concerning the delivery of 500 high-definition cameras and the Equipment Acceptance Protocol 344471/ 10-11-2025 (evidence 27) concerning the delivery of 150 mobile printers/scanners.

vii) As regards the purchase of cordless keyboards/mousses and docking stations for laptops, the authorities have submitted Contract 1017/2025 signed between the IAPR as Contracting Authority and company "NEXT GEN RETAIL SERVICES" (with protocol number 25SYMV017338392 2025-08-04 – evidence 28) for the purchase of 5.500 cordless keyboards/ mousses and 3000 docking stations for laptops, followed by the Equipment Acceptance Protocol 404347/28-11-2025 (evidence 28) for the delivery of 5.500 cordless keyboards/mousses and the Equipment Acceptance Protocol 406079/02-12-2025 (evidence 30) for the delivery of 3000 docking stations for laptops.

viii) As regards the purchase of laptops, the authorities have submitted Contract 1057/2025 signed between the IAPR as Contracting Authority and company “EPAFOS” (with protocol number 25SYMV017613294 2025-09-25 – evidence 31) for the purchase of 300 tablets followed by the Equipment Acceptance Protocol 352941/ 12-11-2025 (evidence 32) demonstrating that the laptops were delivered.

ix) As regards the purchase of projectors, the authorities have submitted Contract 943/2025 signed between the IAPR as Contracting Authority and company “EPAFOS” (with protocol number 25SYMV016571344 2025-04-02 – evidence 33) for the purchase of 200 projectors followed by the Equipment Acceptance Protocol 284869/ 17-10-2025 (evidence 34) demonstrating that the projectors were delivered.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 236 Judicial Map revision

Related Measure: 4,3.16575 Accelerating the administration of justice

Qualitative Indicator: Certificates confirming the function of all affected courts

Time: Q4 2024

1. Context:

This objective of this reform is to accelerate the administration of justice. Its most important element consists of the revision of the civil/penal and administrative judicial map through establishing, abolishing or redistributing courts in all judicial districts.

Milestone 236 requires the issuance of certificates by the administrations of the courts affected by the revision of the administrative and civil/penal judicial map confirming that they are in function, as provided by law.

Milestone 236 is the seventh milestone of the reform, and it follows the completion of milestone 223, milestone 225, milestone 226, milestone 230, milestone 232 and milestone 234. It will be followed by milestone 238, related to the provision of training on mediation and of a unified digital system for mediation centres.

2. Evidence provided:

	Name of the evidence	Short description
1.	A summary document, dated 18 December 2025, duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled.	
2.	Law 5108/2024, published in the Official Journal, section A, No. 65/02.05.2024, styled "Restructuring of the courts of first instance, restructuring of the spatial planning of the courts of	Primary legislation on the revision of the civil and penal judicial map

	civil and penal justice and other provisions”	
3.	Law 5130/2024, published in the Official Journal, section A, No. 127/01.08.2024, styled “Strengthening the System for the Control of Asset Declarations and Declarations of Financial Interests under Law 5026/2023 – Placement of a Foreign Minor in an Institution, Child Protection Structure or Foster Family – Reopening of Proceedings Following the Issuance of a Final Judgment by the European Court of Human Rights – Alignment of the Use of Information by Joint Investigation Teams and in the Execution of European Investigation Orders with Law 4624/2019 – Other Provisions”	Primary legislation amending article 14 paragraph 4 of Law No. 5108/2024 (evidence 2)
4.	Law 5134/2024, published in the Official Journal, section A, No. 146/11.09.2024, styled “Interventions in the Code of Civil Procedure, in the Code of Organization of Courts and the Status of Judicial Officers and in the Code of Criminal Procedure in alignment with the consolidation of the first degree of jurisdiction with Law 5108/2024 - Provisions for the Judicial Police and other emergency regulations”	Primary legislation amending article 4 of Law No. 5108/2024 (evidence 2)
5.	Law 5140/2024, published in the Official Journal, section A, No. 154/30.09.2024, styled “New Development Programme of Public Investments and Complementary Provisions”	Primary legislation amending article 14 paragraph 1 of Law No. 5108/2024 (evidence 2)
6.	Law 5197/2025, published in the Official Journal, section A, No. 76/16.05.2025, styled “Amendments to the legislative framework concerning the	Primary legislation adding paragraph 3A to article 7 of Law 5108/2024 (evidence 2)

	National School of Judicial Officers, the Code on the Organization of Courts and the Status of Judicial Officers, and the Notaries Code, along with other related provisions”	
7.	Law 5232/2025, published in the Official Journal, Section A, No. 163/22.09.2025, styled “Definition of Criminal Offences and Penalties Imposed on Natural and Legal Persons for the Violation of the Restrictive Measures of the European Union – Transposition of Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the Definition of Criminal Offences and Penalties for the Violation of Union Restrictive Measures and Amending Directive (EU) 2018/1673 – and Other Provisions”	Primary legislation amending article 6 of Law No. 5108/2024 (evidence 2)
8.	Presidential Decree 52/2024, published in the Official Journal, section A, No. 151/24.09.2024, styled “Allocation of positions for prosecuting officers in the Public Prosecutors' Offices at Courts of Appeal and Courts of First Instance across the country, and reallocation of the existing positions for First Instance Public Prosecutors”	Secondary legislation on the distribution of new prosecutors’ posts created by virtue of law 5108/2024 (evidence 2) among the restructured penal courts.
9.	Report issued by the head of section of the general directorate of justice of the Greek Ministry of Justice, dated 11 December 2025, under protocol number 78612/oik, regarding the submission of 56 certificates of the respective administrations of the civil and penal courts attached thereto, attesting to the implementation of the revision of the civil/penal judicial map	Cover letter and inventory of the submitted individual certificates attesting that all civil and penal courts affected by the revision of the judicial map are in function

10.	Law 5028/2023, published in the Official Journal, section A, No. 54/09.03.2023, styled “Restructuring of regions and decentralization of jurisdiction of administrative courts, organization of telematic sessions, conversion of transitional seats and establishment of telematic judicial offices - other urgent regulations of the Ministry of Justice and other provisions”	Primary legislation on the revision of the administrative judicial map
11.	Presidential Decree 54/2023, published in the Official Journal, section A, No. 108/10.05.2023, styled “Reallocation of established posts for Judicial Officers of the Regular Administrative Courts”	Secondary legislation on the redistribution of existing administrative judges’ posts among the restructured administrative courts, pursuant to law 5028/2023 (evidence 10)
12.	Law 5256/2025, published in the Official Journal, section A, No. 223/08.12.2025, styled “Digital enhancement of road safety and other provisions”	Primary legislation amending article 6 of evidence 2 sub-paragraph 2 of paragraph I of the Annex to Law 5028/2023 (evidence 10)
13.	Certificate issued by the head of the general commissioner’s office for the administrative courts, dated 16 December 2025, under protocol number 6241	Certificate regarding the function of administrative courts
14.	Report signed by the Greek Minister of Justice, dated 17 December 2025, under protocol number 78197, submitted in the form of a certified copy, on the fulfilment of the milestone.	Report on the fulfilment of the milestone

3. Analysis:

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

Issuance of certificates by the administrations of the courts affected by the revision of the administrative and civil/penal judicial maps confirming that they are in function, as provided by law.

- Regarding the civil and penal courts affected by the revision of the judicial map:

The Greek authorities provided a copy of Law 5108/2024 (evidence 2), on the revision of the civil and penal judicial map (evidence 2), alongside all subsequent amendments to it up to the adoption of evidence 8, as enacted by virtue of Laws 5130/2024 (evidence 3), 5134/2024 (evidence 4), 5140/2024 (evidence 5), 5197/2025 (evidence 6), 5232/2025 (evidence 7) and Presidential Decree 52/2024 (evidence 8). All references hereinafter to evidence 2 should be understood as referring to its consolidated version currently in force, pursuant to above-listed amendments. Regarding the 56 courts of first instance affected by the revision of the civil and penal judicial map (the second-instance courts not having been affected by said revision), article 6 of Law 5108/2024 (evidence 2) lists them by name and defines their seats (main, parallel or peripheral, as applicable), as well as (conjointly with subsequent article 14 paragraph 10, specifically regarding the Athens and Piraeus courts of first instance) their respective territorial competence; it also stipulates the number of established posts of judges, prosecutors and judicial clerks per court formation. By virtue of article 50 paragraphs (a) and (b) of Law 5108/2024 (evidence 2) the number of first-instance court prosecutors was increased by 22; the additional posts thus created were distributed among the courts of first instance by virtue of Presidential Decree 52/2024 (evidence 8). Moreover, regarding the transitional regime applicable to legal cases filed up to 15 September 2024, that is up to the date of entry into force of Law 5108/2024 (evidence 2, as per its article 76) with the secretariats of such courts as were abolished and not converted to peripheral seats of first instance courts, article 14 paragraph 3 of Law 5108/2024 (evidence 2) mandates their transfer to the relevant regionally competent court of first instance on the initiative of the latter's secretariat, which is also obliged to lodge the case in the relevant docket and notify the litigant parties accordingly. Finally, for the avoidance of unnecessary delays due to above-described transfers of pending cases, article 13 paragraph 3 of Law 5108/2024 (evidence 2) allows the head of each court of first instance to use for the conduct of hearings facilities of parallel or peripheral seats of the relevant court or buildings of abolished court formations.

In accordance with articles 17 paragraph 7 and 18 paragraph 1 of Law 4938/2022, the Greek authorities provided a document containing a list of 112 certificates attached to it, which were submitted to the relevant directorate of the Ministry of Justice by the 56 heads of individual first instance courts and by the 56 heads of prosecutors' offices of the above-mentioned courts (evidence 9). All certificates attest to the facts that (i) the respective civil and penal courts affected by the revision of the judicial map are in function as provided by law regarding their territorial and material competence, (ii) that there has been no change to the number of established judicial or clerical posts in any of the courts or prosecutors' offices and (iii) that the above-described obligations of the secretariats deriving from the transitional provisions of articles 14 and 13 paragraph 3 of law 5108/2024 (evidence 2) have been performed.

- Regarding the administrative courts affected by the revision of the judicial map:

The Greek authorities provided a copy of Law No. 5028/2023 on the revision of the administrative judicial map (evidence 10), alongside all subsequent amendments to it, as enacted by virtue of Presidential Decree 54/2023 (evidence 11) and Law 5256/2025 (evidence 12). All references hereinafter to evidence 10 shall be understood as referring to its consolidated version currently in force, pursuant to these amendments. Regarding the 30 courts of first instance and nine courts of second instance affected by the revision of the administrative judicial map, article 6 of No. 5028/2023 (evidence 10) lists them by name and defines their seats (main and the so-called "commuting court seats", as applicable), as well as their respective territorial competence. A commuting court seat is a secondary seat of the relevant court, located in and serving the needs of remote or hard of access areas of Greece, with their own staff and premises; however, the judges who periodically commute there to hear cases hold their established posts at the main seat of the court and belong organically to it. Additionally, article 14 of No. 5028/2023 (evidence 10) redefined the territorial competence of administrative courts with respect to specific categories of cases in the interest of efficiency and of maximizing convenience to the parties to administrative litigation 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. Finally, in view of the eventual conversion (after 31 December 2026) of the 18 existing commuting court seats to remote telematics offices, article 16 of No. 5028/2023 (evidence 10) refers to the conduct of activities in accordance with a roadmap and calendar as laid out in the appendix thereto. Paragraph 2 of the roadmap in question prescribes, starting from 16 September 2024, the launch of the pilot phase of function of telematic offices, with the introduction of additional hearing dates for the remote conduct of hearings, in order to familiarize staff and litigants with the use of the relevant technology; additionally, paragraph 5 of the roadmap prescribes, starting from 2023, the launch of the redistribution of established judicial posts among administrative courts to counter significant deviations in their respective workloads.

In accordance with article 33 paragraph (b) of Law 4938/2022, the Greek authorities provided a document issued by the head of the general commissioner for the administrative courts (evidence 13), which certifies that (i) the reforms introduced by Law 5028/2023 (evidence 10) regarding the revision of the administrative judicial map (first and second instance courts) and the definition and redistribution of their territorial competence have been completed; (ii) the procedure for the reallocation of established posts for judges has been completed, by virtue of Presidential Decree 54/2023 (evidence 11), and (iii) the pilot phase of implementation of telematic court hearings has been launched, given that virtual hearings have successfully been held between (a) the administrative court of first instance of Patras and the commuting seat of Argostolion on 10 December 2024; (b) the administrative court of second instance of Ioannina with the commuting seat of Corfu on 28 May 2025 and 22 October 2025; (c) the Piraeus administrative court of second instance with the commuting seat of Syros on 21 October 2025 and (d) the Tripoli administrative court of first instance with the commuting seat of Sparta on 5 November 2025.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 268a Legal acts for Hellenic Railways

Related Measure: 4,6.16982 Organisational reform in the railways sector

Qualitative Indicator: Entry into force of legal acts for Hellenic Railways

Time: Q4 2024

1. Context:

The objective of the reform is to make the Greek rail sector more safe, efficient, integrated, modern and responsive to customer demand. The measure consists in legal and organisational reforms.

Milestone 268a requires the entry into force of legal acts for a new unified arm's length rail infrastructure company, hereinafter referred to as "Hellenic Railways", except for the legal act for the adoption of the General Traffic Regulation, hereinafter referred to as "GTR", and for the legal acts depending on the GTR.

Milestone 268a is the fourth milestone of the reform, and it follows the completion of milestone 263, milestone 264 and milestone 268, related respectively to the elaboration of a roadmap for the re-organisation of the companies OSE and ERGOSE, the entry into force of primary and secondary legislation for the reform of these two companies, and the publication of an Implementation Plan for the new unified rail infrastructure company (Hellenic Railways). It will be followed by milestone 268b and milestone 268c, related respectively to the entry into force of the new General Traffic Regulation (GTR) and of the secondary legislative measures depending on it, the adoption by the Board of Directors of the Hellenic Railways of the Multiyear program with strategic investments and maintenance works, the signature of a contractual agreement and the contractual appointment of a Technical Manager to support the operational set up of Hellenic Railways, as well as, the execution of the activities outlined in the Implementation Plan for Hellenic Railways, the implementation of the recommendations of the Hellenic Air and Rail Safety Investigation Authority's Rail Accident Report (RL01-2025) of 27 February 2025, and the issuance of a safety authorisation of the Hellenic Railways based on the assessment of the modified safety management system by the Regulatory Authority for Railways.

2. Evidence provided:

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

2	Law 5167/2024, titled "Restructuring of the railway sector and strengthening transport regulatory bodies and other provisions", published in Government Gazette No. 207/A of 20 December 2024, and entered into force on that date, in accordance with Article 54 thereof.	Law providing for i) the restructuring of the railway sector through the absorption of 'ERGA OSE S.A.' hereinafter referred to as "ERGOSE", by its parent company 'Hellenic Railways Organisation S.A.', hereinafter referred to as "OSE", and the consolidation of assets, liabilities, and activities of the merging companies into a consolidated entity, and ii) the transfer of the activity of managing railway rolling stock from the public limited company 'GAIAOSE AE – Real Estate, Building, Tourism and Similar Undertakings' hereinafter referred to as "GAIAOSE", to the consolidated entity indicated in part (i) above.
3	Law 5220/2025, titled "Railway safety upgrade, assessment of railway staff, strengthening of railway network supervision, organisational strengthening of the Railway Regulatory Authority, the National Organisation for the Investigation of Air and Rail Accidents and Transport Safety and the company 'Hellenic Railways', and other provisions", published in Government Gazette No. 131/A of 21 July 2025, and entered into force on that date, in accordance with Article 59 thereof.	Law providing for: i) the creation of new safety structures for railway operations; ii) more effective training and assessment of railway staff, along with the tightening of the sanctioning framework; iii) the organisational strengthening of the Railway Regulatory Authority and the National Organisation for the Investigation of Air and Rail Accidents and Transport Safety, as crucial bodies for safe railway operations, the prevention and investigation of accidents, and the establishment of effective procedures for their rapid staffing; iv) institutionalising the independence of the National Organisation for the Investigation of Air and Rail Accidents and Transport Safety in terms of the management of its resources; and (v) the modernisation of the structure, form and internal operations of the Hellenic Railways company.
4	Notice issued on 1 September 2025 by Department D, 'Financial Institutions, Insurance Limited Companies and Public Limited Companies', of the Directorate for Companies within the Directorate-General for	Notice of the publication in GEMI of the merger contract whereby ERGOSE merges under OSE, along with the minutes from the absorbing company's extraordinary General Assembly Meeting of 29 August 2025. This includes the

	Market and Consumer Protection of the Secretariat-General for Trade of the Ministry of Development regarding the registration in the General Commercial Register, hereinafter referred to as "GEMI", and the publication on the GEMI website of: i) the Merger contract whereby ERGOSE merges under OSE published on 1 September 2025, which is accessible via the link https://publicity.businessportal.gr under GEMI number 000779701000 and specifically at https://publicity.businessportal.gr/api/download/Modifications/5477552?companyId=000779701000 and which entered into force on that date, in accordance with Article 3.1 thereof; ii) the minutes annexed thereto from the meeting of the General Assembly of the absorbing company held on 29 August 2025; iii) the codified Articles of Association of Hellenic Railways enclosed therewith.	codified Articles of Association of the public limited company Hellenic Railways with GEMI number 000779701000 in accordance with the respective provisions of Law 5167/2024 (evidence 2), and Law 5022/2025 (evidence 3).

3. Analysis:

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

Entry into force of legal acts for a new unified arm's length rail infrastructure company ("Hellenic Railways") except for the legal act for the adoption of the General Traffic Regulation (GTR) and for the legal acts depending on the GTR.

Law 5167/2024 (evidence 2) entered into force on 20 December 2024. Article 3.3 of this law stipulates that ERGOSE will merge under OSE. Article 4 states that, following this merger, OSE will be renamed Hellenic Railways, and its corporate purpose will expand to include the activities of ERGOSE. Furthermore, Article 9 specifies that after the merger of ERGOSE with OSE, the management of railway rolling stock, previously entrusted to GAIAOSE, will also transfer to Hellenic Railways. Law 5220/2025 (evidence 3) entered into force on 21 July 2025. Article 29 of this law outlines that after the publication of the draft merger contract in GEMI website, the General Assemblies of the merging companies convene to approve the merger, and the General Assembly of the absorbing company amend its Articles of Association, change the company name, and extend its purpose.

In accordance with these provisions, on 29 August 2025 the General Assembly of the absorbing company formed by the merger of ERGOSE under OSE amended its Articles of Association creating a single codified ‘Articles of Association of the public limited company Hellenic Railways’ (evidence 4, pages 11 to 63). Article 1 of the Articles of Association establishing Hellenic Railways (evidence 4, last paragraph of page 12) stipulates that the Company is a legal person governed by private law and that it is operating with managerial, administrative, accounting and financial autonomy, in accordance with the rules of the private economy governing public limited companies. Moreover, Article 3 of the Articles of Association (evidence 4, page 13) outlines that Hellenic Railways performs the functions of ‘manager’ of the National Railway Infrastructure, thereby bearing responsibility for the operation, maintenance, upgrading and renewal of the railway network as the infrastructure manager.

Thus, Hellenic Railways is a new unified entity formed from the merger of ERGOSE and OSE, incorporating GAIAOSE's railway rolling stock management functions. It operates at arm’s length, being governed with managerial, administrative, accounting, and financial autonomy as a public limited rail infrastructure company.

The new company will undertake responsibility for infrastructure rail safety issues and collaborate with railway undertakings in implementing risk control measures.

Article 16 of Law 5220/2025 (evidence 3) modifies Article 56 of Law 4632/2019, which incorporates Directive (EU) 2016/797 from the European Parliament and Council aiming to improve the interoperability of the rail system within the European Union, into Greek Law. Article 16 specifies the responsibilities of rail system stakeholders to enhance railway safety.

According to Article 56(1) sub-paragraph d of Law 4632/2019 as amended by Article 16 of Law 5220/2025 (evidence 3), the infrastructure manager and railway operators are responsible for ensuring the safe operation of their respective areas of the rail system, and they must manage associated risks by implementing necessary risk control measures and cooperating with each other. Additionally, they are required to develop and maintain updated safety management systems. Article 56(1) sub-paragraph f of Law 4632/2019 as amended by Article 16 of Law 5220/2025 (evidence 3), mandates the creation and publication of a national safety monitoring plan, detailing railway safety goals and the measures required to achieve the Common Safety Targets, while taking into consideration recommendations from the Railway Regulatory Authority and the National Organisation for the Investigation of Air and Rail Accidents and Transport Safety.

Hellenic Railways, acting as the national infrastructure manager company, is therefore, responsible for ensuring rail infrastructure safety and for collaborating with railway undertakings to implement risk control measures.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 277 Simplification of procedures for Ministry of Transport

Related Measure: 4,6.16786 Simplification of the Procedures of the Ministry of Infrastructure & Transport

Qualitative Indicator: Digital procedures in place in the Ministry of Infrastructure and Transport

Time: Q4 2024

1. Context:

The objective of the reform is to digitise and simplify procedures in the Ministry of Infrastructure and Transport. It covers procedures for a) issuance, replacement and renewal of driving licenses, b) transferring vehicles, c) issuance of traffic registration licenses and plates, and d) driving license examinations.

Milestone 277 concerns the digital transformation and simplification of procedures relating to abovementioned elements a) to d).

Milestone 277 is the only milestone of this reform, related to the completion of the digitalisation and simplification of the relevant procedures of in the Ministry of Infrastructure and Transport.

2. Evidence provided:

	Name of the evidence	Short description
1	Cover note	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Contract signed on 19 May 2021	Contract of the project between Ministry of Digital Governance and the Foundation for Research and Technology – Hellas (hereinafter referred to as “FORTH”) (the contractor who implemented the project)
3	Approval Decision signed by the Secretary General Protocol Number: ΥΨηΔ on 25 May 2021 Α. Π.: 15804 ΕΞ 2021	Decision by the Secretary General regarding the “Establishment and appointment of members of the Joint Committee for the monitoring and acceptance of the deliverables of the contract for the project titled ‘Digital

	ΑΔΑ: Ψ2ΟΓ46ΜΤΛΠ-Φ76	Transformation of the procedures of the Ministry of Infrastructure and Transport'"
4	Amending Decision Protocol Number: ΥΨηΔ signed on 31 October 2022 Α. Π.: 44509 ΕΞ 2022 ΑΔΑ: Ψ67046ΜΤΛΠ-ΖΤ2	New Decision amending the previous Decision of 25 May 2021 regarding the appointment of the Joint Monitoring and Acceptance Committee (*hereinafter referred to as "*JMAAC*"*)
5	FORTH Deliverables Π1.1, Π1.2 & Π1.3 including Appendices	FORTH Deliverables Π1.1, Π1.2 & Π1.3 including Appendices, as submitted by contractor, on driving license replacement, issuance of new copy of driving license due to theft or loss, and due to fair wear and tear, covering: • user manual for citizens • user manual for civil servants • relevant legislation • requirements • technical information, i.e. source code and database • technical guidelines
6	Final quality and quantity Acceptance Protocol signed by the JMAAC on 2 August 2021	Final quality and quantity Acceptance Protocol regarding Deliverables: - Π1.1: Driving license replacement, - Π1.2: Copy of driving license due to theft or loss, - Π1.3: Copy of driving license due to fair wear and tear
7	FORTH Deliverable Π1.4 including Appendices	FORTH Deliverable Π1.4 including Appendices, as submitted by contractor, on driving license renewal, covering: • user manual for citizens • user manual for civil servants • survey on data protection impact assessment • relevant legislation • requirements analysis for health certificates for driving license issuance and renewal

8	FORTH Deliverable Π3.2 including Appendices	FORTH Deliverable Π3.2 including Appendices, as submitted by contractor, on issuing a copy of a vehicle registration license due to theft or loss, covering: • user manual for citizens • user manual for civil servants • relevant legislation
9	Acceptance protocol signed by the JMAAC on 29 March 2022	Final quality and quantity acceptance protocol regarding Deliverables: - Π1.4: Driving license renewal, - Π3.2: Copy of a vehicle registration license due to theft or loss
10	FORTH Deliverable Π3.1 including Appendices	FORTH Deliverable Π3.1 including Appendices, as submitted by contractor, on the transfer of vehicles, covering: • user manual for citizens • user manual for civil servants • relevant legislation • technical information, i.e. database • survey on data protection impact assessment
11	Final Quality and Quantity Acceptance Protocol signed by the JMAAC on 13 February 2023	Final quality and quantity Acceptance Protocol regarding Deliverable: - Π3.1: Vehicle Transfer
12	FORTH Deliverable Π3.3 including Appendices	FORTH Deliverable Π3.3 including Appendices, as submitted by contractor, on the issuance of a vehicle registration license and vehicle/ motorcycle registration plates, covering: • user manual for citizens • user manual for civil servants • relevant legislation • technical information, i.e. database
13	Acceptance protocol signed by the JMAAC on 21 November 2023	Final quality and quantity Acceptance Protocol, as submitted by contractor, regarding Deliverable:

		- Π3.3: Issuance of a vehicle registration license and Vehicle/ motorcycle registration plates
14	FORTH Deliverable Π2 including Appendices	FORTH Deliverable Π2 including Appendices, as submitted by contractor, on the electronic services for the issuance of initial driving license, covering • user manual for citizens • user manual for driving schools • user manual for civil servants
15	Acceptance protocol signed by the JMAAC on 14 November 2025	Final quality and quantity Acceptance Protocol, as submitted by contractor, regarding Deliverables: - Π 2.1 Candidate Management Application - Π 2.2 Driving Schools Application - Π 2.3 Theoretical and Practical Lessons Control Application - Π 2.4 Theoretical and Practical Exams Scheduling Application - Π 4.1 Candidate Data Entry Application - Π 4.2 Management Application - Π 4.3 Examiner Application - Π 4.4 Candidate Application - Π 4.5 Statistics Application - Π 4.6 Business Intelligence System
16	FORTH Deliverable Π4 including Appendices	FORTH Deliverable Π4 including Appendices, as submitted by contractor, on the theory testing for new drivers, covering: • user manual for the new drivers' theory exam system
17	Operational model of the measure "Simplification of procedures for Ministry of Transport" written and implemented by FORTH https://drivers-vehicles.services.gov.gr/content/27	Description of the platform's adopted operational model used by Ministry of Infrastructure and Transport, which was developed and submitted by the contractor, in the context of the measure "Simplification of procedures for Ministry of Transport".

	7_16786__R_Operational_Model.pdf	
18	Link to gov.gr national portal	https://drivers-vehicles.services.gov.gr/ The link provides access to the digital services

3. Analysis:

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

Digital transformation and simplification of procedures in place concerning a) issuance, replacement and renewal of driving licenses,

Greece completed the digitalisation and simplification of the relevant procedures through the assignment of the project to the Foundation for Research and Technology - Hellas, henceforth "FORTH" or "the contractor", via the signature of a programmatic agreement. This agreement was signed by the Ministry of Digital Governance and it details the said procedures and the scope of the project (evidence 2). For the purpose of monitoring and accepting the deliverables of the agreement, a Joint Monitoring and Acceptance Committee (*hereinafter referred to as "*JMAAC*"*) was appointed by the Secretary General of Digital Governance (evidences 3 and 4).

Specifically, the Greek authorities provided the following deliverables submitted by the contractor: i) Π1.1, Π1.2, and Π1.3 regarding the replacement of driving licenses, the issuance of a new copy due to theft or loss, or a new copy due to fair wear and tear (evidence 5); ii) Π1.4 regarding the renewal of driving licenses completing the full set of license lifecycle services (initial issuance/replacement/issuance of a copy/renewal) (evidence 7); iii) Π2 regarding the electronic services for the issuance of initial driving license (evidence 14). The Greek authorities also provided the respective acceptance protocols of the JMMAC, in line with national legislation, whereby the completion and final delivery of the abovementioned deliverables was confirmed (evidences 6, 9, and 15, respectively).

The services concerning the issuance, replacement and renewal of driving licenses are available online to citizens, limiting the need for physical presence. Following the implementation of the project, the process is simplified and digitized in line with the milestone requirement, as photos and signatures are submitted digitally by photographers and retrieved automatically through the system, fees are calculated and receipts are issued automatically, and health certificates are submitted digitally, enabling faster completion of the process, whilst reducing the risk of certificate forgery and improving traceability.

b) transferring vehicles,

The Greek authorities provided Deliverable Π3.1 submitted by the contractor (evidence 10), which relates to the electronic submission of an application and the relevant documents during the transfer of vehicle ownership between a seller and a buyer, and the issuance of a new registration certificate. Greece also provided the respective acceptance protocol of the JMAAC, in line with national legislation, whereby the completion and final delivery of the abovementioned deliverable was confirmed (evidence 11).

The service of transferring a vehicle has been simplified and digitalised in line with the milestone requirement, reducing the need for physical presence at a vehicle registration office, and replacing the paper forms and the manual calculation of fees. The new process provides for an automatic payment system and ensures that sellers can complete the entire sale speedily and remotely, whilst only the buyer needs to visit the office to collect the new registration certificate. Buyers also receive a digitally signed certificate, valid for 30 days to insure and drive the vehicle until the collection of the paper certificate.

c) issuance of traffic registration licenses and plates,

The Greek authorities provided Deliverables Π3.2 regarding the copy of a vehicle registration license due to theft or loss (evidence 8), and Deliverable Π3.3, which enables the digital process for issuing a vehicle registration license and license plates for new passenger vehicles or motorcycles (evidence 12). The process pertains to the registration of a new or used vehicle imported into the country for the first time and encompasses all procedures up to the issuance of the new vehicle registration license. Greece also provided the respective acceptance protocols of the JMAAC, in line with national legislation, whereby the completion and final delivery of the abovementioned deliverables were confirmed (evidences 9 and 13, respectively).

The service of issuing traffic registration licenses and plates has been simplified and digitalised in line with the milestone requirement, reducing the need for on-site exchange of paper documentation between customs authorities, importers, sellers, and citizens, and eliminating the need for multiple office visits. Specifically, the simplification and digitization of the process resulted in the elimination of manual data entry and reduced coordination time between agencies, given that full interoperability and automatic data exchange with customs authorities makes the process seamless as all stakeholders (car importers, sellers, rental companies, citizens) use a unified platform.

and d) driving license examinations.

The Greek authorities provided the relevant deliverables submitted by the contractor, i.e. Π2 concerning the electronic services for the issuance of initial driving license (evidences 14), and Π4 concerning the theory testing for the driver's license process, associated with the development of a new monitoring system for the theory (evidence 16). Greece also provided the respective acceptance protocols of the JMAAC, in line with national legislation, whereby the completion and final delivery of the abovementioned deliverables were confirmed (evidence 15).

The processes relating to driving license examinations are based on the interconnection of three applications, which facilitate the simplification and digitisation of the supported service, in line with the milestone requirement. Specifically, the new processes allow for a centralized system coordinating all examination rooms nationwide, the automatic retrieval of candidate data as well as digital photographs for candidates' identity verification from the central platform, real-time result transmission to Driver Training and Examination Record, and the automatic notification of the candidate via email and SMS immediately after the examination.

Lastly, the Greek authorities provided a copy of the description of the platform's adopted operational model (evidence 17) for the abovementioned services for issuing, replacing, or renewing a driver's license, transferring vehicles, issuing traffic registration licenses and plates, and conducting driving license examinations, which was developed as a guide to the digital services now in place and which describes, amongst others, the simplification gains and other practical details, such as method of accessing the services online through the gov.gr national portal.

The Commission accessed the link (evidence 18) provided by the authorities on 23 December 2025 to verify that the abovementioned services for issuing, replacing, or renewing a driver's license, transferring vehicles, issuing traffic registration licenses and plates, and conducting driving license examinations are available digitally through thegov.gr portal. This check was completed successfully, confirming that the simplified services can be accessed digitally.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 313 Delivery of Digital transformation of Agri-Food Sector projects

Related Measure: 4,6.16653 Digital Transformation of the Agri-Food Sector

Qualitative Indicator: Delivery of the 1) Digital Transformation of the Agricultural Sector and 2) Outward Looking Agriculture projects.

Time: Q4 2024

1. Context:

The objective of this investment is to facilitate the adoption of innovative technologies in the Greek agriculture sector, the control of Greek product counterfeiting, Greek food products, create new agri-food knowledge in Greece.

Milestone 313 requires the delivery of the project Digital Transformation of the Agricultural Sector and the project Outward Looking Agriculture.

Milestone 313 is the second milestone of the investment, following the completion of milestone 311, related to the launch of the call for the digital transformation of the agri-food sector. It also precedes the third and final milestone 313a, delivering the extension of the Digital Transformation of the Agricultural Sector.

2. Evidence provided:

	Name of the evidence.	Short description
Subproject 1: Digital Transformation of the Agricultural Sector		
1	Summary document duly justifying how the milestone was satisfactory fulfilled	The summary document includes justifications on the fulfilment of the relevant elements of the milestone, as listed in the description of the milestone
2	Contract by Information Society, Number: 2355/06-03-2024 ΑΔΑΜ: 24SYMV014381531 2024-03-07	Contract signed for the implementation of the project "Digital Transformation of the Agricultural Sector"
3	Acceptance Protocol by the Monitoring and	Acceptance Protocol n. 1 by the Monitoring and Acceptance Committee of the Project

	Acceptance Committee of the Project, 10805/08-05-2024	
4	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, 16231/08-07-2024	Acceptance Protocol n. 2 by the Monitoring and Acceptance Committee of the Project
5	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, 18420/02-08-2024/Corr_17-12-2024	Acceptance Protocol n. 3 by the Monitoring and Acceptance Committee of the Project
6	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, 21195/18-09-2024	Acceptance Protocol n. 4 by the Monitoring and Acceptance Committee of the Project
7	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, 25517/08-11-2024	Acceptance Protocol n. 5 by the Monitoring and Acceptance Committee of the Project
8	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, 28065/10-12-2024	Acceptance Protocol n. 7 by the Monitoring and Acceptance Committee of the Project
9	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, 223/08-01-2025	Acceptance Protocol n. 8 by the Monitoring and Acceptance Committee of the Project
10	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, 2467/06-02-2025	Acceptance Protocol n. 9 by the Monitoring and Acceptance Committee of the Project
11	Acceptance Protocol by the Monitoring and Acceptance Committee of	Acceptance Protocol n. 10 by the Monitoring and Acceptance Committee of the Project

	the Project, 4690/06-03-2025	
12	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, 17406/24-07-2024 ΑΔΑ: 6ΖΗΦ469Η4Σ-Ξ56	Approval Decision of the Board of the Information Society S.A. approving Acceptance Protocol 1
13	Approval Decision of the Board of the Information Society S.A, 28358/12-12-2024/Corr_24-12-2024 ΑΔΑ: 6ΜΟΝ469Η4Σ-ΛΥ6	Approval Decision of the Board of the Information Society S.A. approving Acceptance Protocols 1, 2, 3, 4, 5
14	Approval Decision of the Board of the Information Society S.A, 11074/12-05-2025 ΑΔΑ: 6546469Η4Σ-9Τ5	Approval Decision of the Board of the Information Society S.A. approving the Acceptance Protocols 7, 8, 9, 10
Subproject 2: Outward-looking Agriculture		
15	Contract by Information Society, Protocol Number: 2237/14-08-2023 ΑΔΑΜ: 23SYMV013263161 2023-08-16	Contract signed for the implementation of the project “Outward-looking Agriculture”
16	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, Number: 1718/26-01-2024	Acceptance Protocol n. 4 by the Monitoring and Acceptance Committee of the Project
17	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, Number:	Acceptance Protocol n. 8 by the Monitoring and Acceptance Committee of the Project

	12932/03-06-2024	
18	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, Number: 18258/01-08-2024	Acceptance Protocol n. 10 by the Monitoring and Acceptance Committee of the Project
19	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, Number: 22526/03-10-2024/Corr_09-10-2024	Acceptance Protocol n. 12 by the Monitoring and Acceptance Committee of the Project
20	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, Number: 30092/31-12-2024	Acceptance Protocol n. 15 by the Monitoring and Acceptance Committee of the Project
21	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, Number: 4244/28-02-2025	Acceptance Protocol n.17 by the Monitoring and Acceptance Committee of the Project
22	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, Number: 13451/05-06-2025	Acceptance Protocol n.20 by the Monitoring and Acceptance Committee of the Project
23	Acceptance Protocol by the Monitoring and Acceptance Committee of the Project, Number: 18599/01-08-2025	Acceptance Protocol n. 22 by the Monitoring and Acceptance Committee of the Project
24	Approval Decision of the Board of the Information Society, Protocol Number: 9021/15-04-2024 ΑΔΑ: ΨΓΗ9469Η4Σ-ΥΥΤ	Approval Decision of the Board of the Information Society S.A. approving the Acceptance Protocol 4

25	Approval Decision of the Board of the Information Society, Protocol Number: 23804/18-10-2024 ΑΔΑ: 6Τ80469Η4Σ-ΑΙΨ	Approval Decision of the Board of the Information Society S.A. approving the Acceptance Protocols 8, 10 and 12
26	Approval Decision of the Board of the Information Society, Protocol Number: 24068/13-10-2025 ΑΔΑ: 632Α469Η4Σ-ΧΣΘ	Approval Decision of the Board of the Information Society S.A. approving the Acceptance Protocols 15, 17, 20 and 22

3. Analysis:

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

Delivery of the 1) Digital Transformation of the Agricultural Sector

Greece provided evidence that the requirement has been fulfilled through the official procurement contract 2355/06-03-2024, with IIS TA code: 5173972, signed between the Information Society as contracting authority and the consortium of companies "NEUROPUBLIC INFORMATION AND COMMUNICATIONS SOCIETY ANONYME - THE TELECOMMUNICATIONS ORGANIZATION OF GREECE S.A. SKARMOUTSOS GEORGE TOU IOANNIS" (evidence no. 2). The project develops an integrated technological platform to support the digital transformation of agriculture in Greece, connecting farmers, organizations, research institutes, local authorities, and other stakeholders involved in land and production processes.

Major deliverables include a web portal for service and data access, data storage, interpretation and visualization subsystem, data collection station network monitoring system, Data Warehouse (Business intelligence subsystem), agricultural advisory subsystem, farm advisory repository, agricultural risk assessment and resilience subsystem, remote sensing data management system etc. Each listed subsystem corresponds to a contract deliverable.

Greece has provided additional evidence of delivery through nine Acceptance Protocols (evidence no.3 to 11), issued by the Project Acceptance Committee, each corresponding to a package of contract deliverables and reflecting progress in implementation. This evidence is complemented by four Approval Decisions (evidence no. 12 to 14) of the Board of Information Society formally endorsing the abovementioned protocols. The set of deliverables accepted corresponds to the project defined in the measure description as the "Digital Transformation of the Agricultural Sector" project.

Delivery of the 2) Outward Looking Agriculture project

Greece provided evidence that the requirement has been fulfilled through the official procurement contract 2237/14-08-2023, with IIS TA code: 5173972, signed between the Information Society as contracting authority and VODAFONE PANAFON HELLENIC TELECOMMUNICATIONS COMPANY S.A (evidence no. 15). The project supports the extroversion (export orientation) of Greek agriculture, by developing and upgrading information systems, platforms and innovative tools for branding and combating fraudulent use of Greek designation.

Major deliverables include an implementation study, the upgrade of the Easy Agro Expo Platform, the Import Registration Platform, Imports-Exports Business Intelligence System, the Greek Farms Portal and Digital Exhibition, and the Multi-Channel Platform for User Requests, along with their respective pilot operations and analyses of results, as well as regular performance and stock taking reports.

As evidence of delivery of the project, Greece has provided eight Acceptance Protocols (evidence no. 16 to 23), issued by the Project Acceptance Committee, corresponding to all major deliverables. The evidence is complemented by three Approval Decisions (evidence no. 24 to 26) of the Board of Information Society formally endorsing all Acceptance Protocols. The set of deliverables accepted corresponds to the project defined in the measure description as “Outward Looking Agriculture Project”.

4. Commission Preliminary Assessment: Satisfactory fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 333 Entry into force of the Transition to 5G technology reform

Related Measure: 2,1.16844 Transition to 5G technology, facilitating the development of innovative remote services.

Qualitative Indicator: Entry into force of the regulatory and legislative framework

Time: Q3 2024

1. Context:

The transition to 5G technology reforms foresees the entry into force of a new regulatory and legislative framework for the transition to 5G.

Milestone 333 foresees the entry into force of secondary legislation defining the process of allocation of 5G Spectrum for Pilot projects via Phaistos fund or/and university entities, including a process for identifying further opportunities and risks in the development of 5G networks, the streamlining of procedures for the allocation of 5G spectrum, and the assessment of requirements and risks in specific economic applications.

Milestone 333 is the only milestone linked to the reform.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document	Summary document duly justifying how the milestone requirements (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) have been satisfactorily fulfilled
2	Law 4727/2020, Governmental Gazette FEK 184/A/23-09-2020, subsequently amended by Law 5218/2025, Governmental Gazette FEK 125/A/14-07-2025	Law 4727/2020 Article 92 reserves a zone of specific radio frequencies for a period of ten years, to be used by universities/research centers and the “Phaistos Fund” companies. Articles 93 and 94 implement the regulatory and legislative framework for using 25% of the multi-band 5G auction earnings to support the innovative Phaistos fund which invests in companies and projects providing 5G products and services.

		Article 107(61) regulates the 5G spectrum allocation procedure targeted for Pilot projects via Phaistos Fund. Article 107(62) regulates the 5G spectrum allocation process for Pilot projects via university entities or/and research centers. Article 107(63) regulates the procedure for the expression of public entities' interest in using the universities/research centers 5G pilot applications.
3	Ministerial Decision 2755/20-04-2022, Governmental Gazette FEK 2024/B/21-04-2022	Ministerial Decision 2755/20-04-2022 binds 200 MHz (24.25 - 24.45 GHz) from the 26 GHz frequency band for a period of ten years for the exclusive use of the frequencies according to Article 92(1) of Law No. 4727/2020.
4	Law 5218/2025, Governmental Gazette FEK 125/A/14-07-2025	Article 76 amends Law 4727/2020, Article 107(61) and (62), and foresees the entry into force of secondary legislation.
5	Ministerial Decision 32266/09-10-2025, Governmental Gazette FEK 5500/B/15-10-2025	Ministerial Decision 32266/09-10-2025 defines the process for granting the use of the reserved 5G spectrum allocation to companies selected by "5G Ventures S.A.", that apply to develop pilot 5G networks, products and/or services. The decision also defines the process for identifying further opportunities and risks in the development of 5G networks, the streamlining of procedures, and the assessment of requirements and risks in specific economic applications.
6	Ministerial Decision 32267/09-10-2025, Governmental Gazette FEK 5499/B/15-10-2025	Ministerial Decision 32267/09-10-2025 defines the process for granting the use of the reserved 5G spectrum allocation to universities and/or research centers that apply to develop 5G pilot networks, products and/or services. The decision also defines the process for identifying further opportunities and risks in the development of 5G networks, the streamlining of procedures, and the assessment of requirements and risks in specific economic applications.

3. Analysis:

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

Entry into force of secondary legislation defining the process of allocation of 5G Spectrum for Pilot projects via Phaistos fund or/and university entities, including a process for identifying further opportunities and risks in the development of 5G networks, the streamlining of procedures for the allocation of 5G spectrum, and the assessment of requirements and risks in specific economic applications.

Law 4727/2020 of 23 September 2020, entitled "*Digital Governance (Transposition to the Greek Legislation of Directive (EU) 2016/2102 and Directive (EU) 2019/1024) – Electronic Communications (Transposition to the Greek Law of Directive (EU) 2018/1972) and Other Provisions*" (evidence n. 2) contains provisions on the allocation of 5G spectrum for pilot applications.

- Article 92(1) "*5G spectrum for pilot applications*" of Law 4727/2020 reserves a zone of specific radio frequencies (3400-3410 MHz) for a period of ten years "*for the purposes of research and/or development and/or innovation in networks, products and/or services operating on or relating to 5G infrastructure*".
- Article 92(2) to Article 92(4) provides that additional frequencies of the 26 GHz frequency band, of the 733-736 MHz and 788-791 MHz frequency bands and of other spectral bands may be used for the same purposes.
  - In line with Article 92(2) of Law 4727/2020, Ministerial Decision 2755/20-04-2022 (Governmental Gazette FEK 2024/B/21-04-2022) (evidence n. 3), bound 200 MHz (24,25 – 24,45 GHz) from the 26 GHz frequency band for a period of ten years, in order to exclusively use these frequencies for research, development and innovation purposes in networks, products and services operating in 5G infrastructures.
- Article 92(5) provides that rights of use for a limited period of time, not exceeding 12 months, may be granted to all establishments and/or research centers in Greece wishing to develop pilot networks, products and/or services operating on or relating to 5G infrastructure.
- Article 92(8) provides that general government bodies, other public sector bodies, universities and research centers may become pilot users of products and/or services in 5G infrastructure for the period of their development in accordance with the provisions of this Decree, following an expression of interest to the Minister for Digital Governance.
- Article 93 *Establishment of a company "Participations 5G S.A."* and Article 94 *Mutual Fund of Venture Holdings 'Phaistos Fund'* of Law 4727/2020 implement the regulatory and legislative framework for facilitating relevant investments and involve using 25% of the multi-band 5G auction earnings to support the "Phaistos fund". The fund's objective is the investment in businesses (startups or otherwise) which are actively researching and/or developing solutions based on 5G technologies. Eligible companies could be active in business sectors such as transport, logistics, manufacturing, industry, defence, goods and utility networks, health, tourism, information and media.
- As concerns the process of allocation of 5G Spectrum for Pilot projects via the "Phaistos fund", Article 107(61) *Enabling provisions for digital governance* of Law 4727/2020 provides that the reserved 5G frequency bands referred to under Article 92 can be allocated to companies in which "Phaistos Fund" has selected to invest in, provided that their proposals (i) have already been selected by "Participations 5G S.A" and (ii) include a request for the right to use part of the radio spectrum to be granted.
- As concerns the process of allocation of 5G Spectrum for university entities, Article 107(62) *Enabling provisions for digital governance*, of Law 4727/2020, provides that the reserved 5G

frequency bands referred to under Article 92 can also be allocated to universities or/and research centers that request to develop pilot 5G networks, products and/or services in 5G infrastructure.

Following the amendment of Article 107 (61) and (62) of Law 4727/2020 through Article 76 of Law 5218/2025, the Ministry of Digital Governance issued two Ministerial Decisions specifying respectively the process of allocating the reserved 5G spectrum to: (i) companies selected by "5G Ventures S.A." and whose projects are funded via the "Phaistos Fund" and (ii) universities and/or research centers that request to develop 5G pilot networks, products and/or services.

- Ministerial Decision 32266 (evidence n. 5), which entered into force on 15 October 2025, specifies the process of allocating the reserved 5G spectrum to companies selected by "5G Ventures S.A." and whose projects are funded via the "Phaistos Fund".
    - The decision (Article 3(12) and Article 4(5) with Annexes C and D) also specifies the required process for identifying further opportunities and risks in the development of 5G networks, the streamlining of procedures, and the assessment of requirements and risks in specific economic applications. The abovementioned process includes two key reporting milestones.
        - The semi-annual report provided under Annex C shall contain information on (i) the current state of development, (ii) the identified opportunities and risks in 5G development, (iii) the identified obstacles or delays in the implementation process and proposals for the streamlining of permitting, installation, operation, (iv) the assessment of requirements and risks in financial applications and (v) conclusions and proposals.
        - The annual report provided under Annex D shall contain information on (i) the project evolution and the achievement of objectives, (ii) additional opportunities and risks arisen in the course of the project, (iii) recording improvements or difficulties in procedures, (iv) assessment of requirements and risks of financial applications of the projects, (v) general conclusions and proposals for continuation, extension or modification of the project. Completion and submission of the annual report is a prerequisite for the maintenance or one-time renewal of the right to use the radio spectrum.
- Ministerial Decision 32267 (evidence n. 6), which entered into force on 15 October 2025, specifies the process, conditions, required risk assessment studies and the terms for granting rights to use parts of the reserved 5G frequency bands to universities or/and research centers that request to develop 5G pilot networks, products and/or services.
    - The decision (Article 3(11) and Article 4(5) with Annexes C and D of Ministerial Decision) also specifies the required process for identifying further opportunities and risks in the development of 5G networks the streamlining of procedures, and the assessment of requirements and risks in specific economic applications. The abovementioned process includes two key reporting milestones:
        - The semi-annual report pursuant to Annex C shall contain information on (i) the current state of development, (ii) the identified opportunities and risks in 5G development, (iii) the identified obstacles or delays in the implementation process and proposals for the streamlining of permitting, installation, operation, (iv) the assessment of requirements and risks in financial applications and (v) conclusions and proposals.
        - The annual report pursuant to Annex D shall contain information on (i) the project evolution and the achievement of objectives, (ii) additional opportunities and

risks arisen in the course of the project, (iii) recording improvements or difficulties in procedures, (iv) assessment of requirements and risks of financial applications of the projects, (v) general conclusions and proposals for continuation, extension or modification of the project. Completion and submission of the annual report is a prerequisite for the maintenance or one-time renewal of the right to use the radio spectrum.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 353 Identification of areas for Renewable Energy Sources and framework for dual use of land for agriculture and photovoltaics

Related Measure: 5,1.16989 Optimisation of land and sea space usage for the development of RES and offshore wind energy development

Qualitative Indicator: Legal act(s)

Time: Q4 2024

1. Context:

The objective of this reform is to enhance the development of renewable energy sources (hereinafter referred to as "RES") in Greece. The reform consists of the legal framework for offshore wind farms as well as facilitating RES on land.

Milestone 353 requires (i) the entry into force of legal act(s), identifying RES potential, geographical distribution of existing Renewable Energy Sources units, permits for future Renewable Energy Sources units, and (ii) the entry into force of legal act(s), identifying suitable sites for implementing Agri-Photovoltaics, actions for the promotion of Agri-Photovoltaics, rules for the dual use of land and Agri-Photovoltaics projects.

Milestone 353 is the first step of the implementation of the reform. It will be followed by milestone 354, related to the entry into force of legal acts to facilitate the development of RES, including offshore wind farms.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled	
2	Law 5261/2025 titled "Regulation of carbon capture, usage, transport and storage – Incorporation of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC and Regulation (EC) No	Articles 66-68 of the law set out the Agri-Photovoltaics framework that optimises land space for RES development by establishing the rules for the dual use of land for agriculture and photovoltaics. It defines suitable areas for Agri-PV deployment, the actions required for their promotion and the operational and technical rules governing dual-use projects. Upon entry into force of the relevant legal act, the full regulatory

	1013/2006, and other provisions”; entered into force on 12 December 2025, the date of publication in the Official Journal (Government Gazette A’231/12.12.2025) as stated in Article 81.	framework enabling the structured development of Agri-Photovoltaics is implemented. Article 69 of the law establishes the legal basis for conducting national studies and preparatory actions necessary for the spatial planning, siting and system integration of future energy infrastructure, including Renewable Energy Sources (RES) and Carbon Capture and Storage (hereinafter referred to as “CCS”) facilities. It empowers the competent Ministry to issue secondary legislation—such as Ministerial Decisions—to define the scope, methodology and deliverables of such studies, and to mandate public authorities or supervised entities to collect, analyse and manage technical, environmental and geospatial data.
3	Ministerial Decision (MD) “YPEN/DAPEEK/144627/3247/19.12.2025” titled “Mapping of areas to achieve the renewable energy target in gross final energy consumption by 2050, in accordance with paragraph 18 of Article 33 of Law 4936/2022”; entered into force on 31 December 2025, the date of publication in the Official Journal (Government Gazette B’7365/31.12.2025) as stated in Article 8.	The Ministerial Decision defines a national spatial assessment for renewable energy deployment in Greece, mapping existing and pipeline wind and photovoltaic projects against national RES targets up to 2050, based on administrative data and resource analysis, in order to identify the areas required to achieve the renewable energy objectives set out in the National Energy and Climate Plan.

3. Analysis:

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

Entry into force of legal act, identifying Renewable Energy Sources potential; geographical distribution of existing Renewable Energy Sources units; permits for future Renewable Energy Sources units.

Law 5261/2025 “Regulation of carbon capture, usage, transport and storage – Incorporation of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC and Regulation (EC) No 1013/2006, and other provisions” (evidence 2, Government Gazette A’231/12.12.2025), which has entered into force on 12 December 2025, pursuant to Article 81 of Law 5261/2025, establishes the legal basis for conducting national studies and preparatory actions necessary for the spatial planning, siting and system integration of future energy infrastructure, including Renewable Energy Sources (RES) and Carbon Capture and Storage (CCS) facilities. Law 5261/2025 authorises the competent Ministry to issue secondary legislation, such as Ministerial Decisions, to outline the scope, methodology, and deliverables of RES studies, and tasks public authorities or supervised entities with the collection, analysis, and management of technical, environmental, and geospatial data.

As set out in the Ministerial Decision (hereinafter referred to as "MD") "Mapping of areas to achieve the renewable energy target in gross final energy consumption by 2050, in accordance with paragraph 18 of Article 33 of Law 4936/2022" (evidence 3, MD YPEN/DAPEEK/144627/3247/19.12.2025, Government Gazette B'7365/31.12.2025), which has entered into force on 31 December 2025, pursuant to Article 8 of the MD, Articles 1 to 7 of the MD concern the provision of a spatial map of RES plants in Greece, the current state of development of solar and wind power plants, and the identification of areas for the deployment of RES plants required to meet the national renewable energy targets for 2030 and 2050 as set out in Greece's National Energy and Climate Plan (hereinafter referred to as "NECP") (p. 2-31).

Article 3 of the MD details the RES potential in Greece, providing analyses of wind and solar energy potential (evidence 3, p. 3-10). Article 3.1 describes the wind energy potential, highlighting favourable conditions due to Greece's geomorphology, topography, and the interaction of maritime and continental air masses. These factors contribute to robust wind resources, depicted via graphical representations at altitudes from 80 m to 120 m, using a scale ranging from 0 to 20 m/s. Article 3.2 details the solar energy potential, describing Greece's geographic advantages and high solar exposure, facilitating optimal conditions for photovoltaic energy production. Spatial distributions of solar irradiation are illustrated on horizontal planes and based on optimally inclined photovoltaic panels. Articles 4 and 5 specify electricity demand, energy infrastructure and electricity storage (evidence 3, p. 11-13). Accordingly, the gross domestic electricity consumption is estimated to reach 61.8 TWh by 2030 and to 130.5 TWh by 2050, indicating growing demand for RES installations. Electricity storage capacity is forecasted at 6.2 gigawatt by 2030 and 17.4 gigawatt by 2050, facilitating future RES integration.

Article 6 of the MD specifies the geographical distribution of existing RES units, using data from November 2025 provided by the competent national licensing, grid connection, and operational authorities (evidence 3, p. 13-27). The spatial representation encompasses solar and onshore wind energy RES units at regional levels and categorised by operational status, i.e. units in operation, units with final connection offers, units with complete requests for final connection offers, and units with obtained producer certificates. Article 6.1 presents the geographical distribution of onshore wind units that depict installed capacity in megawatts, providing regional maps for every operational/permitting status. Article 6.2 presents the geographical distribution of photovoltaic units that depict installed capacity in megawatts.

Articles 6 and 7 of the MD detail the permitting for future RES units (evidence 3, p. 13-29). Applying the operational status categorisation provided in Article 6, the MD identifies current and future RES units expected to materialise through permitting. Article 7 presents aggregated capacity figures for photovoltaic and onshore wind projects across licensing stages, providing regional maps for every operational status category (evidence 3, p. 27-29). Regarding onshore wind installations, 6.3 GW are operational, 3.4 GW have secured a connection offer, 6.5 GW are under application for connection, and 18.2 GW have obtained a producer certificate (evidence 3, p. 19). Regarding photovoltaic installations, 11.2 GW are operational, 11.3 GW have secured a connection offer, 41.6 GW are under application for connection, and 11.8 GW have obtained a producer certificate (evidence 3, p. 27).

Entry into force of legal act, identifying suitable sites for implementing Agri-Photovoltaics; actions for the promotion of Agri-Photovoltaics; rules for the dual use of land and Agri-Photovoltaics projects.

Law 5261/2025 "Regulation of carbon capture, usage, transport and storage – Incorporation of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the storage of carbon dioxide in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC and Regulation (EC) No 1013/2006, and other provisions" (evidence 2, Government Gazette A'231/12.12.2025), which has entered into force on 12 December 2025, pursuant to Article 81 of Law 5261/2025, introduces legal provisions allowing for the identification of suitable sites for implementing Agri-Photovoltaics, actions for the promotion of Agri-Photovoltaics, and rules for the dual use of land and Agri-Photovoltaics projects (Articles 66 to 68, p. 34-36).

As set out in Law 5261/2025, Articles 66 and 67 provide the legal framework for identifying suitable sites for Agri-Photovoltaics. Accordingly, Article 66 introduces the scope and basic siting architecture for agri-photovoltaic stations by defining them as electricity-generation systems with a capacity of up to 200 kilowatts, with photovoltaic panels installed at least 2.10 metres above cultivated land or placed on the roofs of greenhouse facilities (evidence 2, p. 34). Suitable sites for agri-photovoltaic stations must comply with the technical standards outlined in Ministerial Decision YPAAT/2243/333582/27.11.2020, which specifies construction types and technical requirements for greenhouses, ISO 668 box-type compartments, medicinal hemp cultivation, and aquatic organism breeding structures, including approval and control procedures (evidence 2, p. 34). According to Article 67, the right to install an agri-photovoltaic station is granted to professional farmers registered in the Register of Farmers and Agricultural Holdings, who must cultivate the land on which the installation is proposed (evidence 2, p. 34).

Article 67 of Law 5261/2025 specifies actions for the promotion of Agri-Photovoltaics by introducing a simplified licensing framework that exempts agri-photovoltaic stations from obtaining producer certificates (evidence 2, p. 34). Article 68 further stipulates promotion actions by establishing a compensation framework for agri-photovoltaic stations, encouraging participation in fixed-price operating aid contracts, allowing financial support from the National Development Plan or other sources of financing, and exempting agri-photovoltaic stations from competitive bidding procedures (evidence 2, p. 36).

Article 67 of Law 5261/2025 outlines the procedure for siting and licensing of Agri-Photovoltaics, detailing rules for dual land use through explicit restrictions and agricultural-preservation rules for installations over agriculturally cultivated areas and greenhouses. Accordingly, agri-photovoltaic stations must not cover more than 10% of the original cultivated area, thereby preserving agricultural productivity alongside energy generation (evidence 2, p. 35). Additionally, Article 68 introduces long-term monitoring rules, requiring owners of agri-photovoltaic stations to submit annual reports for ten years following the beginning of operations. These reports must demonstrate that agriculture remains the primary activity and that the cultivated area maintains a production yield of at least 66% compared to the year before the agri-photovoltaic station was installed (evidence 2, p. 36).

Furthermore, in line with the description of the measure, **the milestone consists of facilitating Renewable Energy Sources on land.**

Based on the assessment covering all constitutive elements of the milestone, it is confirmed that the legal framework set out in Law 5261/2025 and the accompanying Ministerial Decision (MD) include provisions for identifying suitable sites for the implementation of RES units on land, including photovoltaic and onshore wind power plants.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 355 Establishment of the legal framework for carbon capture, usage, and storage.

Related Measure: 5,1. 16988 Regulatory and market operation framework for carbon capture, usage, and storage technologies to foster industry decarbonization

Qualitative Indicator: Entry into force of legislation

Time: Q3 2024

1. Context:

The objective of this reform is to set up the legal and regulatory framework for carbon capture, usage and storage technologies. The reform consists of the development of the licensing framework, the establishment of standardisation and certification process and the definition of third-party access.

Milestone 355 foresees the entry into force of the legal framework for carbon capture, usage, and storage (CCS). The legal framework adopted will set out (i) development of the licensing framework, including the issuance of the environmental permit approval; (ii) establishment of a relevant standardisation and certification process for the origin of the captured and stored CO_2 emissions; (iii) development of the regulatory framework for the CCS value chain for storage and transport charges (incl. enabling provisions for Contracts for Difference); (iv) third-party access of the grid and transportation infrastructure and storage facility; and (v) assignment of responsibilities of the various stakeholders for the operation of the CCS technologies and the supervision of the respective market.

Milestone 355 is the only milestone of this reform, related to the setup of the legal and regulatory framework for carbon capture, usage and storage technologies in Greece.

2. Evidence provided:

	Name of the evidence.	Short description
1	Law 5261/2025 (OJ A 231/12.12.2025) “Regulation of CO_2 capture, usage, transport and storage – Incorporation of Directive 2009/31/EC of the European Parliament and of the Council of 23 April 2009 on the storage of CO_2 in geological formations and amending Council Directive 85/337/EEC, Directives 2000/60/EC, 2001/80/EC, 2004/35/EC and 2008/1/EC and Regulation	Adopted law establishes a comprehensive legal and regulatory framework governing the licensing, operation, regulation and supervision of carbon capture, usage and storage, as well as transport activities, aligned with Directive 2009/31/EC.

	(EC) No 1013/2006, and other provisions.” Entry into force: 12 December 2025 (i.e. on the date of its publication in the Official Journal, as stated in Article 81).	
2	Law 4014/2011 (OJ A 209/21.09.2011) “Environmental licensing of projects and activities, regulation of unauthorized constructions in connection with the creation of an environmental balance and other provisions of the Ministry of Environment.” Entry into force: 13 January 2012 as stated in Article 37 (paragraph 1) of Law 4014/2011.	Adopted law establishes the core framework for the environmental licensing of projects and activities in Greece. It introduces the categorisation of projects (A1, A2, B), the requirement for Environmental Impact Assessment (hereinafter referred to as “EIA”) and the issuance of Environmental Terms Approval (hereinafter referred to as “AEPO”) for category A projects, and Standard Environmental Commitments for category B. It defines procedures for public consultation, renewal and amendment of permits, and the use of electronic environmental registries.
3	Ministerial Decision 1958/2012 (OJ B 21/2012), issued pursuant to Article 1(4) of Law 4014/2011 and formally titled “Classification of public and private projects and activities into categories and subcategories pursuant to Article 1(4) of Law 4014/2011.” Entry into force: Entered into force on 13 January 2012 as stated in Article 7.	Adopted secondary legislative act sets the detailed classification of projects for environmental licensing. It specifies which activities fall under Category A and therefore require a full Environmental Impact Assessment. The Decision includes in Category A all major industrial, energy-related and subsurface interventions (incl. deep drilling, geological works and high-pressure injection).
4	Regulatory decision ” Capacity Allocation Code	Act of the National Regulatory Authority for Energy, Waste and Water concerning the

	of the Prinos Pilot Carbon Dioxide Storage Site in accordance with paragraph (b) of paragraph 10 of article 40 of law 5261/2025” Decision E-28/2026, OJ B 773/16.02.2026 Entry into force: date of publication in OJ (p. 7402)	Capacity Allocation Code of the storage site of Prinos
5	Regulatory decision ”Tariff Regulation for the Prinos Pilot Carbon Dioxide Storage Site in accordance with paragraph (c) of paragraph 10 of article 40 of law 5261/2025” Decision E-29/2026, OJ B 774/16.02.2026 Entry into force: date of publication in OJ (p. 7435)	Act of the National Regulatory Authority for Energy, Waste and Water concerning the Tariff Regulation of the storage site of Prinos
6	Regulatory decision ” Guidelines for conducting the expression of interest phase of the Market Test for the capacity allocation of the Prinos Pilot Carbon Dioxide Storage Site through an international public tender in accordance with paragraph 3 of article 27 of Law 5261/2025” Decision E-30/2026, OJ B 775/16.02.2026	Act of the National Regulatory Authority for Energy, Waste and Water concerning the guidelines of tender procedures allowing third party to have access to the storage site of Prinos, including market test guidelines.

	Entry into force: date of publication in OJ (p. 7513)	
7	Corrigendum of three regulatory decisions: (i) Decision E-28/2025, OJ B 773/16.02.2026; (ii) Decision E-29/2025, OJ B 774/16.02.2026; and (iii) Decision E-30/2025, OJ B 775/16.02.2026. Decision 2505, OJ B 1092/03.03.2026 Entry into force: date of publication in OJ (p. 10889)	Initial three regulatory decision (evidences 4-6) were adopted with the following decision numbers: (i) Decision E-28/2025; (ii) Decision E-29/2025; and (iii) Decision E-30/2025. The corrigendum corrected the decision numbers to: (i) Decision E-28/2026; (ii) Decision E-29/2026; and (iii) Decision E-30/2026.

3. Analysis:

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

Entry into force of the legal framework for carbon capture, usage, and storage, setting out…

Greece adopted a primary law (hereinafter referred to as "Law 5261/2025") that establishes a comprehensive legal and regulatory framework governing the licensing, operation, regulation and supervision of carbon capture, usage and storage (hereinafter referred to as "CCS") (evidence 1).

Development of the licensing framework for the installation and operation of carbon capture, usage and storage technologies including the issuance of the environmental permit approval.

Law 5261/2025 (evidence 1), includes the following provisions: (i) Article 5: establishes the legal basis for licensing CO_2 capture activities by providing that capture is permitted only for natural persons or legal entities that operate CO_2 capture installations and hold an operating licence that expressly includes the capability to perform CO_2 capture (Article 5(1) and under Article 5(2), that the CCS Authority must issue a recommendation to the authority competent to grant or amend the operating licence, both regarding the inclusion of CO_2 capture capability in the licence and the technical measures that must be incorporated to ensure scientifically sound and safe capture operations; Article 6: establishes the legal framework governing the use of CO_2 derived from capture processes; and Articles 8–20: establish the regulatory framework for the exploration and storage of CO_2.

The overall environmental permitting framework is established under Law 4014/2011 (evidence 2). Article 10(3) of Law 5261/2025 (evidence 1) sets out that an approved environmental permit needs to be issued as a prerequisite for granting either an exploration or a storage permit, thereby embedding the environmental licensing process directly within the CCS legal framework. Further, Law 4014/2011 (evidence 2) is operationalised by the Ministerial Decision 1958/2012 (evidence 3). This secondary legislative act translates the general classification principles set out in Law 4014/2011, into a binding and granular taxonomy, identifying which types of projects fall within Category A due to the nature, scale, or technical characteristics of their activities. This Minister Decision includes, among other things, extensive listings of subsurface interventions, major industrial installations, energy-related infrastructure, and activities involving the injection or management of fluids and gases under pressure - categories expressly designated as having potentially significant environmental impacts. Geological CO_2 storage operations align closely with multiple aspects of these Category A definitions. Finally, Law 5261/2025 (evidence 1) reflects the requirements of Directive 2009/31/EC, which mandates that any geological storage site undergoes a full Environmental Impact Assessment prior to authorisation, including assessment of site characterisation, reservoir behaviour, monitoring and corrective measures, leakage scenarios, and impacts on human health and the environment. Taken together, the combined national legal framework constituted of Law 4014/2011 (evidence 2), its implementing Ministerial Decision 1958/2012 (evidence 3), and the national CCS law (evidence 1) establishes that the nature, scale, and environmental significance of geological CO_2 storage operations place them within Category A, necessitating a full Environmental Impact Assessment and the issuance of Environmental Terms Approval before any exploration or storage permit can be granted.

Establishment of a relevant standardisation and certification process for the origin of the captured and stored CO2 emissions.

Law 5261/2025 (evidence 1) contains the following provisions: (i) Article 7(2) sets out the first formal certification step, which requires the issuance of a certificate of transport for every shipment of CO_2 and needs to be submitted as part of the supporting documentation for a storage permit application, as required by Article 17(2) point (b); and (ii) Article 17(1) sets out the second certification step that arises when CO_2 is accepted for injection at the storage site, and requires that the CCS Authority verifies that the incoming CO_2 stream meets the conditions laid down in the storage permit. Following this acceptance, Article 17(3) requires the issuance of a certificate of storage, confirming that the CO_2 stream has been injected and stored in accordance with the storage permit. This certificate directly links the transported CO_2 to the stored CO_2, creating continuity between the two certification points.

Development of the regulatory framework for the CCS value chain for storage and transport charges.

Article 27 of Law 5261/2025 (evidence 1) governs access to both CO_2 transport networks and storage sites. Article 27(2) requires that access be granted under the principles of impartiality, transparency, and fair and open access, and it organises access into a dual system. A defined percentage of the initially estimated storage capacity is assigned under a regulated access model, with capacity allocated equally among interested users at a reference price based on the Weighted Average Cost of Capital (WACC) of the site, through 15-year non-transferable contracts that include a mandatory store-or-pay clause.

Further, as set out under Article 40(10) (evidence 1), the regulator, Regulatory Authority for Energy, Waste and Water (hereinafter referred to as “RAAEY”) is required to issue a tariff regulation for each CO_2 storage site, defining the methodology for determining and adjusting the tariff per ton of reserved CO_2 injection and storage capacity, as well as all pricing elements associated with the storage infrastructure. The tariff regulation must be adopted following a proposal by the storage operator and a recommendation by the CCS Authority, the Hellenic Hydrocarbons and Energy Resources Management Company (hereinafter referred to as “HEREMA”). In this context, the tariff regulation for the Prinos CO_2 Storage Site (evidence 5), represents the first concrete application of Article 40(10) point (c).

The framework shall include enabling provisions for Contracts for Difference, as well as regulated tariffs.

Article 37 of Law 5261/2025 (evidence 1) sets out that the State may establish support schemes for users of CO_2 transport networks and storage installations. Article 37(1) allows financial mechanisms to reduce the cost burden for users, including through Contracts for Difference (hereinafter referred to as "CfDs") that compensate the difference between a reference price and the cost borne by the user. Article 37(2) specifies the parameters of such CfDs, including the stable price, floors, ceilings, activation thresholds, calculation of support, competitive procedures for selecting beneficiaries, monitoring requirements, penalties for non-compliance and settlement procedures. Article 37(3) mandates competitive processes for awarding these schemes, in accordance with the provisions governing capacity allocation as set out under Article 27.

Establishment of the framework for the usage/utilisation of captured CO_2.

Article 6 of Law 5261/2025 (evidence 1) provides for the legal basis for the utilisation of captured CO_2, as it sets out that the use of CO_2 originating from capture activities is permitted only for natural or legal persons holding a specific CO_2 usage permit, issued by the authority competent to grant or amend the operating licence of the primary activity. The framework for the usage/utilisation of captured CO_2 is further operationalised through the enabling provisions provided under Article 40(1), while Article 42 ensures legal continuity and immediate applicability until the time when a secondary legislative act may be put in place.

Adoption of the third-party access framework in the grid/transportation infrastructure and storage facility.

Article 27 of Law 5261/2025 (evidence 1) sets out the provisions forming the framework for third-party access, which applies to CO_2 transport infrastructure, including pipeline networks, and to storage sites. Article 27(2) stipulates that access must be granted in accordance with the principles of impartiality, transparency, fairness and open access, and it establishes a dual mechanism for the allocation of initially estimated storage capacity. Article 27(5) sets out the conditions under which access may be refused. Article 28 sets out provisions as concerns the dispute-resolution mechanism, which applies to disputes involving both transport infrastructure and storage sites.

Further, two related secondary legislative acts have been adopted. First, Guidelines for Market-Test Tendering Procedures (evidence 6), which further specify the design and execution of the market-test phase, as set out in Article 27(2). Second, operational implementation of the third-party access framework is completed by the Capacity Allocation Code adopted by the regulator (RAAEY for each storage site, as per the enabling provision of Article 40(10) point (b) (evidence 1). The Capacity Allocation Regulation for the Prinos CO_2 Storage Site (evidence 4) operationalises these statutory requirements by setting out the exact percentages of the initially estimated storage capacity to be allocated (i) under regulated access, (ii) under public international tendering following the market-test procedure, and (iii) under short-term contracts.

Assignment of distinct responsibilities of the various stakeholders for the operation of the carbon capture, usage and storage technologies and the supervision of the respective market.

Law 5261/2025 (evidence 1) assigns distinct responsibilities to the various stakeholders involved in the governance of CCS activities in Greece, namely:

- *Ministry of Environment and Energy:* Article 8 provides it the sovereign authority to grant rights for the exploration and storage of CO_2. Based on technical input from the HEREMA, the Ministry is responsible for designating areas that may be considered potential storage sites

(Article 9). When a storage permit is requested, the Ministry grants the final authorization, taking into account both the HEREMA's binding technical evaluation and, where applicable, the opinion of the European Commission (Articles 12(4), 13, and 14). The Ministry also retains the power to amend, suspend, or revoke storage permits if the holder fails to meet legal obligations or deviates from approved conditions (Articles 15 and 16).

- *HEREMA:* Article 4 designates HEREMA as the competent CCS Authority responsible for implementing and supervising the CCS framework. The HEREMA evaluates applications and issues exploration licences, including decisions concerning extensions, transfers, and revocations when justified (Articles 10 and 11). The CCS Authority also plays a decisive role in granting storage licences, providing the binding recommendation that determines whether a site is suitable for permanent CO_2 storage and under which conditions such storage may safely occur (Articles 12 and 13).
- *RAAEY:* Article 27 provides RAAEY the responsibility of setting out the regulation, supervision, and approval of the operational, access, and pricing frameworks for CO_2 transport and storage infrastructure. Article 40(10) points (b–d) provides the enabling provisions allowing for regulatory decisions (secondary legislative acts) to be adopted by RAAEY.
- *Storage Operator:* Article 18 sets out that during the operational phase, the Storage Operator must implement the approved monitoring plan to track the movement and behaviour of injected CO_2 and ensure the continued integrity of the storage facility. The Storage Operator is required to collect and maintain monitoring data and submit regular reports to the HEREMA, enabling verification that the site behaves as expected and that permit conditions are observed (Article 19). The Storage Operator must also cooperate with HEREMA inspections, granting access to relevant equipment, records, and on-site facilities (Article 20). In the event that monitoring or inspections reveal leakage or abnormal conditions, the Storage Operator is responsible for promptly implementing corrective measures under the supervision and direction of the HEREMA (Article 21). Upon cessation of injection activities, the Storage Operator executes the closure plan, including well sealing and continued post-closure monitoring to ensure containment integrity (Article 22).
- *Settlement Committee*: the Settlement Committee provides a formal mechanism for mediation and dispute resolution concerning access to or operation of CO_2 transport networks and storage sites. Its composition, mandate, and procedures are defined in Article 28(7–8). The Committee is established under the auspices of RAAEY and consists of five members: two RAAEY representatives, one representative of the Ministry of Environment and Energy, one representative of the HEREMA, and one representative of the relevant Storage Operator.
- *Exploration Operator:* the HEREMA grants the exploration licence (Article 10). The Exploration Operator is responsible for site characterization, geological analysis, and preliminary data acquisition to determine the suitability of a location for long-term CO_2 storage. Article 11(9) sets out that the Exploration Operator must collect, maintain, and submit exploration data to the HEREMA, thereby providing that the technical basis for storage permit evaluation is transparent, verifiable, and scientifically sound.

As concerns the three regulatory decisions adopted (evidences 4-6) a corrigendum was subsequently adopted (evidence 7) by RAAEY to correct a clerical error as concerns the decision numbers initially given to these three regulatory decision.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Non-repayable support

Number and name of the Milestone: 359 Framework for dynamic pricing contracts

Related Measure: 5,1.16991 Regulatory framework towards a smart grid

Qualitative Indicator: Legal act

Time: Q4 2024

1. Context:

The objective of the measure is to invest in smart grid technologies and practices in Greece's electricity market. This measure consists in enacting reforms for incentivizing smart meter usage and establishing a framework for dynamic pricing for end-consumers, as well as executing the upgrade of existing control infrastructure of the distribution network management.

Milestone 359 foresees the entry into force of the legal acts for dynamic pricing contracts to implement the dynamic pricing for all end-consumers as soon as a smart meter is installed in their service connection. The legal act shall set out design issues, key terms of dynamic contracts. The legal act shall establish rights and obligations of operators, load representatives and customers, related to the implementation of dynamic pricing.

Milestone 359 is the second milestone of the reform, and it follows the completion of milestone 358. It will be followed by milestone 360, related to works executed for the Distribution System Operator Control Center infrastructure.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Cover note	Summary document duly justifying how the milestone was satisfactorily fulfilled.
2	Ministerial Decision ΥΠΕΝ/ΔΗΕ/134493/3907 on the establishment of a framework for the implementation of electricity dynamic pricing contracts issued by the Ministry of Environment and Energy, published on 09.12.2025 in the Official Journal (Government Gazette B’ 6565/09.12.2025). Entry into force on 1 February 2026 for large consumers and 1 April 2026 for small consumers, per virtue of Article 16.	Ministerial Decision establishing the framework for the implementation of dynamic pricing contracts.

3	Regulatory Decision E-283/2025 "Amendment of the Hellenic Electricity Distribution Network Operation Code and the Metering and Measurements Manual for the implementation of dynamic pricing" (Government Gazette B' 6788/17.12.2025), issued by the Regulatory Authority for Energy, Water and Waste. Entry into force on 17 December 2025 date of publication in the Government Gazette as stated in Article 23	Decision of Regulatory Authority for Energy, Waste and Water for the amendment of: a) the National Electricity Distribution Network Operation Code, and b) the Manual of Meters and Measurements of National Electricity Distribution Network.

3. Analysis:

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

Entry into force of the legal acts for dynamic pricing contracts to implement the dynamic pricing for all end-consumers as soon as a smart meter is installed in their service connection.

The framework for dynamic pricing contracts is established by the Ministerial Decision ΥΠΕΝ/ΔΗΕ/134493/3907 on the establishment of a framework for the implementation of electricity dynamic pricing contracts, published in the Government Gazette B' 6565/09.12.2025 (hereafter 'Ministerial Decision' or 'MD') (evidence 2), along with the amendment of the National Electricity Distribution Network Operation Code and the Manual of Meters and Measurements by virtue of RAAEY's Decision E-283/2025, published in the Government Gazette B' 6788/17.12.2025 (hereafter 'RAAEY Decision') (evidence 3).

To facilitate implementation of the framework, the Ministerial Decision categorizes customers into two groups, by virtue of Article 3: small and large customers. Small customers comprise all household consumers and non-household consumers with contracted capacity up to 25 kVA, and large customers are the remaining ones, namely non-household consumers with a contracted capacity exceeding 25 kVA. Therefore, as stated in Article 16, the MD will enter into force on 1 February 2026 for large customers and on 1 April 2026 for small customers.

The dynamic pricing contracts can be requested by any customer as soon as a smart meter is installed in their infrastructure, as stated in Article 2(2) of the MD (evidence 2).

The RAAEY decision (evidence 3) further specifies the technical requirements of the smart meter capable of providing near real-time measurements and supports the dynamic pricing, as stated in Article 22 of the RAAEY Decision (evidence 3).

The legal act setting out design issues, key terms of dynamic contracts.

Article 1 of the Ministerial Decision (evidence 2) sets the scope of the framework for dynamic electricity contracts, outlining their design principles, standard contractual terms, and the rights and responsibilities of operators, load agents and customers.

The contractual framework for dynamic pricing is defined by a set of provisions in the Ministerial Decision, aiming to ensure customer protection, pricing clarity, and compliance with regulatory requirements. Article 10 (evidence 2) establishes the pre-contractual consumer information.

Articles 4, 5, and 11 (evidence 2) address the design and key terms of a dynamic contract. Specifically, Article 4 provides for the general principles of the dynamic pricing contracts. Article 5 sets the specifications of the dynamic pricing contracts and the structure of the tariffs.
Article 11 of the MD (evidence 2) addresses the key terms of a dynamic contract and specifies that dynamic pricing contracts must explicitly state that electricity prices vary on an hourly basis at most and must carry an orange label (evidence 2 Article 11(1)). Article 12 of the MD specifies terms and conditions for the dynamic pricing contracts.

The legal act shall establish rights and obligations of operators, load representatives and customers, related to the implementation of dynamic pricing.

The rights, and responsibilities of the stakeholders involved in dynamic electricity pricing including load representatives, customers, and operators, are defined in the MD (evidence 2). Regarding the operators, the obligation to provide certified metered data, based on which customers are billed, is established at Article 12(5) of the MD (evidence 2).

Load representatives with more than 200.000 customers are obliged to offer at least one dynamic pricing contract per customer category (small/ large, household/non-household) (evidence 2 Article 9(1) and (5)). Additionally, the MD aims to enable informed consumption decisions and demand response while protecting customers from extreme market price events.

To ensure informed customer participation in dynamic pricing schemes, Article 10 (evidence 2) sets out detailed pre-contractual information requirements that load representatives must fulfil prior to contract conclusion. Additionally, Article 13 requires load representatives to publish the final hourly supply prices for the following day on their websites and through a dedicated digital platform accessible via computers and mobile devices (evidence 2 Article 13(1)). Finally, the role of load representatives is further defined in Article 12 (evidence 2), which includes provisions regarding the content and format of consumption bills and relevant charging information, as described above.

Regarding customers, certain elements of the framework established by the MD (evidence 2), and in particular those defining the obligations of load representatives, are designed to safeguard customer interests and promote transparency in dynamic pricing arrangements. Dynamic pricing contracts must not discriminate against customers of the same category, must not lead to direct or indirect cross-subsidies and must not include abusive fees (e.g. fee imposed for switching load representative or terminating a contract under a dynamic pricing scheme) (evidence 2 Article 4(4)-(8)). Customers shall be duly informed of all aspects (opportunities, costs and risks) relating to dynamic pricing contracts (evidence 2 Article 10(1)), they shall be provided with all the necessary information (evidence 2 Article 10(2),(3),(5)), suitable tools (evidence 2 Article 10(4)) and the contractual terms (evidence 2 Article. 10(6), Article 11(7)) prior to providing their written consent (evidence 2 Article 10(7), Article 11(3)) and entering into the new or extended dynamic pricing contract. The contractual terms shall not be modified during contract period (evidence 2 Article 11(10)) except with regard to the pricing terms and only upon request of the customer (evidence 2 Article 11(9)). Furthermore, as presented above, the framework establishes the right to access all relevant information related to their billing, including metering data, along with recommendations on how to reduce their electricity costs (evidence 2 Article 12(8) - (11)). Necessary information shall be made available by load representatives on their websites and through a dedicated digital platform in an appropriate format (evidence 2 Article 13).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Loan support

Preliminary Assessment – M/T specific section: Loan support

Number and name of the Target: 327 EUR 9 800 million of financial institutions funds signed with final beneficiaries

Related Measure: 4,7.16980 RRP Loan Facility

Quantitative Indicator: Amount (million EUR)

Baseline: 7064

Target: 9800

Time: Q4 2025

1. Context:

The investment concerns the use of 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 shall make use of different distribution channels, among which the financial institutions' distribution channel (EUR 13 268 million).

Target 327 refers to the financial institutions' distribution channel and requires that EUR 9 800 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 the contribution to the 48.98% climate target and 24.19% digital target.

Target 327 is the ninth milestone or target of the investment, and it follows the completion of milestones 320 and 321 (due in Q3 2021) that were part of the first payment request, of milestones 322 and 323 (due in Q1 2022) and target 324 (due in Q4 2022) that were part of the second payment request, of target 325 (due in Q4 2023) that was part of the third payment request, of target 325a (due in Q2 2024) that was part of the fourth payment request, and of target 326 (due in Q4 2024) that was part of the fifth payment request. It will be followed by: (i) target 329 concerning the signature of EUR 500 million of legal agreements with funds (due in Q4 2025); (ii) target 330 concerning the InvestEU approval of operations of EUR 500 million (due in Q4 2025); (iii) target 327a concerning the signature with final beneficiaries of EUR 11 500 million of financial institutions funds (due in Q1 2026); (iv) target 329a concerning the signature of EUR 600 million of legal agreements with funds (due in Q1 2026); (v) target 328 concerning the signature with final beneficiaries of EUR 13 268 million of financial institutions funds (due in Q2 2026); (vi) milestone 328a concerning the completion of the investment by the Ministry of Finance (due in Q2 2026); and (vii) target 330a concerning the InvestEU approval of operations of EUR 800 million (due in Q2 2026).

2. Evidence provided:

	Name of the evidence	Short description

1	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled	
2	Ministry of Finance report	Copy of report by the Ministry of Finance (protocol number 38233 of 05.03.2026) including information on the target completion.
3	Reports by financial institutions	Copies of eight reports on the target completion submitted by the following participating financial institutions: European Investment Bank (EIB), European Bank for Reconstruction and Development (EBRD), National Bank of Greece, Piraeus Bank, Alpha Bank, Eurobank, Optima Bank, Credia Bank (dated 25.02.2026 το 03.03.2026). The reports also include reference to the results of the independent auditor reports per project.
4	Independent auditors' certificates	Copies of 15 certificates by independent auditors concerning the audits conducted on Loan Facility projects (dated 24.02.2026 to 26.02.2026).
5	Decision of the Alternate Minister of Finance number 120536 ΕΞ 2021, Official Journal B 4522/30.09.2021, as amended by the following Decisions of the Alternate Minister of Finance: 159337 ΕΞ 2021, Official Journal B 5886/15.12.2021; 47990 ΕΞ 2022, Official Journal B 1814/13.04.2022; 29692 ΕΞ 2023, Official Journal B 1087/28.02.2023; 42484 ΕΞ 2025, Official Journal B 1357/20.03.2025.	Copy of the Decision (and amendments to that Decision) of the Alternate Minister of Finance laying down the procedure for allocating funds to financial institutions, the terms and conditions of the procedure for granting loans to undertakings, the specification of the criteria and methods of checking the eligibility of investments financed with resources from the Recovery and Resilience Facility, and the definition of the procedure, conditions and criteria for awarding the eligibility assessment of investment projects to auditors.
6	Independent auditor's assurance report number 45444 / 17.03.2026	Copy of the independent certified auditor's assurance report including the auditor's ex post assessment on the target completion (dated 17.03.2026).

3. Analysis:

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

EUR 9 800 million (including management fees) of RRF Loan Facility funds related to International Financial Institutions and commercial banks have been signed with the final beneficiaries […]. Furthermore, in line with the description of the measure, **loans shall be channelled through International Financial Institutions (IFI) and commercial banks (CB).**

According to the reports by financial institutions (evidence 3) and as confirmed by the Ministry of Finance report (evidence 2), overall, since the establishment of the Loan Facility, EUR 9 665 million (including management fees) of Loan Facility funds have been signed between eight financial institutions (international financial institutions and commercial banks) - European Investment Bank (EIB), European Bank for Reconstruction and Development (EBRD), National Bank of Greece, Piraeus

Bank, Alpha Bank, Eurobank, Optima Bank, Credia Bank - and final beneficiaries. The Council Implementing Decision requires that EUR 9 800 million of RRF Loan Facility funds related to International Financial Institutions and commercial banks have been signed with the final beneficiaries. Compared to the previous target (T326 which requires that EUR 7 064 million have been signed), this target T327 requires that an additional amount of EUR 2 736 million should have been signed. The additional amount signed in the context of target T327 is EUR 2 601 million. Whilst this constitutes a minimal numerical deviation of 4.9% 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.

Furthermore, in line with the description of the measure, **the loans provided by the State shall cover a maximum of 50% of the investment costs, with the financial institutions' participation at a minimum 30%, and debtor participation amounting to at least 20%.**

According to the reports by financial institutions (evidence 3) and as confirmed by the Ministry of Finance report (evidence 2), the RRF loans (i.e. loans provided by the State) cover 44.5% (maximum 50% requirement in the description of the measure in the Council Implementing Decision), the financial institutions' participation cover 32.5% (minimum 30% requirement in the description of the measure in the Council Implementing Decision), and the debtor participation covers 23% (minimum 20% requirement in the description of the measure in the Council Implementing Decision) of the investment costs.

Furthermore, in line with the mandate defined in milestones 320 and 321: **[…] decision-making shall be based on sound economic criteria and shall be at arms' length from the government […] financial institutions shall evaluate funding requests and decide based on their internal criteria […] financial institutions shall ensure that the funded investments have positive net present values […] an assessment by the financial institution providing the financing is foreseen […].** Furthermore, in line with the description of the measure, **funded investments should have a positive net present value, ensuring that the decision to finance is based on sound economic criteria.**

According to the reports by financial institutions (evidence 3) and as confirmed by the Ministry of Finance report (evidence 2), the funded investments have positive net present values and the decisions for each investment are based on sound economic criteria according to the financial institutions' assessments based on their internal criteria, policies and procedures, at arms' length from the government.

Furthermore, in line with the mandate defined in milestones 320 and 321, **funded investments should be aligned with the strategic pillars for the Loan Facility […].** Furthermore, in line with the description of the measure, **funded investments should be aligned with the five strategic pillars set for the Loan Facility, namely green transition, digitalisation, extroversion, economies of scale through mergers and acquisitions, innovation (R&D).**

According to the reports by financial institutions (evidence 3) and as confirmed by the Ministry of Finance report (evidence 2), the amount of EUR 9 665 million (including management fees) concerns 605 loan contracts in the following Loan Facility strategic pillars: green transition; digitalisation; extroversion; innovation (R&D).

Furthermore, in line with the mandate defined in milestones 320 and 321, **a dedicated Investment Board shall monitor the implementation, without being involved in the selection process. Financial institutions shall report to the Investment Board on regular intervals.**

According to Article 7 of the Decision of the Alternate Minister of Finance (120536 ΕΞ 2021, Official Journal B 4522/30.09.2021, as amended) (evidence 5), a dedicated Investment Board monitors implementation, and financial institutions report occasionally to that Investment Board. Moreover, that Article provides the list of the Investment Board's responsibilities, which does not include any involvement of the Investment Board in the selection process.

Furthermore, in line with the mandate defined in milestones 320 and 321, **the amount of the disbursements shall occur in tranches.**

According to the reports by financial institutions (evidence 3) and as confirmed by the Ministry of Finance report (evidence 2), disbursements to financial institutions occurred in tranches.

Furthermore, in line with the mandate defined in milestones 320 and 321, **key performance indicators (KPIs) shall be set for the monitoring of disbursed loans that can also serve as benchmarks for the conditional release of further tranches.**

According to the reports by financial institutions (evidence 3) and as confirmed by the Ministry of Finance report (evidence 2), key performance indicators were set for the monitoring of disbursed loans. These indicators can also serve as benchmarks for the conditional release of further tranches. 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:

i. Value of loans disbursed to final beneficiaries over total value of loan contracts signed: EUR 4 793 million loans disbursed to final beneficiaries over EUR 9 665 million loan contracts signed (including management fees).
ii. Value of deferred loan service payments over total value of ordinary loan service payments: There were no deferred loan service payments.
iii. 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 RRF loans are currently serviced at 100% of the loan portfolio.
iv. Value of interest paid over value of accrued interest: The value of interest paid is EUR 96.3 million, and the value of accrued interest is EUR 96.7 million.
v. Value of interest paid over value of loans disbursed to final beneficiaries: EUR 96.3 million interest paid over EUR 4 793 million of loans disbursed to final beneficiaries.

Furthermore, in line with the mandate defined in milestones 320 and 321, **the State and the financial institutions shall participate pari passu and all decisions regarding restructuring shall be allocated to the financial institutions.**

According to Article 6 of the Decision of the Alternate Minister of Finance (120536 ΕΞ 2021, Official Journal B 4522/30.09.2021, as amended) (evidence 5), the Greek State and the financial institutions participate pari passu, and all decisions regarding restructuring are to be allocated exclusively to the financial institutions, if / when applicable.

Furthermore, in line with the mandate defined in milestones 320 and 321, **refinancing of outstanding loans shall be excluded.** Furthermore, in line with the mandate defined in milestone 321, **no state**

guarantee shall be provided on loans extended by commercial banks in the framework of the Loan Facility.

According to Article 6 of the Decision of the Alternate Minister of Finance (120536 ΕΞ 2021, Official Journal B 4522/30.09.2021, as amended) (evidence 5), no refinancing of outstanding loans and no State guarantees shall be provided on loans extended by commercial banks.

[…] 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 the contribution to the 48.98% climate target and 24.19% digital target. Furthermore, in line with the mandate defined in milestones 320 and 321: **funded investments should comply with State aid rules […] an assessment by an independent certified auditor prior to the provision of financing is foreseen […] independent auditors shall assess the eligibility of the investments according to the selection criteria and compliance with relevant State aid rules [...].** Furthermore, in line with the description of the measure: **[…] the Loan Facility shall finance only eligible projects […] funded investments should comply with State aid rules and the Do No Significant Harm Technical Guidance (2021/C58/01) […] Independent auditors shall verify compliance with DNSH and with the 48.98% climate target and 24.19% digital target before each request for disbursement.**

According to certificates provided by independent auditors including a list of projects they audited (evidence 6), these auditors verified ex ante (i.e. before loan contract signature and requests for disbursement) compliance with governance, selection, monitoring and audit and loss-sharing criteria, State aid rules, the Do No Significant Harm Technical Guidance (2021/C58/01) and the contribution to the 48.98% climate target and 24.19% digital target. Moreover, the reports by the financial institutions (evidence 3) and the Ministry of Finance (evidence 2) summarize the findings of independent auditors' reports for each project, specifying the auditor and the reference number for each project, and listing all the elements assessed, notably:

i. The eligibility of the investment and the budget.
ii. The investment project's appropriate categorisation under the Loan Facility strategic pillars.
iii. The compatibility of the interest rate granted considering relevant State aid rules.
iv. 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.
v. The project's compliance with the Do No Significant Harm Technical Guidance (2021/C58/01) confirming:
    a. Compliance with the relevant EU and national environmental legislation.
    b. The adequate application of the climate and environmental sections of the Commission's technical guidance on sustainability proofing for the InvestEU fund (2021/C 280/01).
    c. That the project does not relate to activities excluded from eligibility.
vi. The contribution of the project to the climate target and the digital target before each request for disbursement, in accordance with the methodology in Annexes VI and VII to the Recovery and Resilience Facility Regulation (including the relevant intervention fields), and the compliance by the financial institutions with the relevant legal provisions regarding the climate and digital commitments.

Furthermore, in line with the mandate defined in milestones 320 and 321: **[…] an ex post assessment by an independent certified auditor is foreseen […]**

According to the independent certified auditor’s assurance report (evidence 6), an ex post assessment by that auditor has been conducted, certifying the satisfactory fulfilment of this target.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Loan support

Number and name of the Target: 329 Legal agreements signed with funds - EUR 500 million

Related Measure: 4,7.16980 RRP Loan Facility

Quantitative Indicator: Amount (million EUR)

Baseline: 0

Target: 500

Time: Q4 2025

1. Context:

The investment concerns the use of 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 shall make use of different distribution channels, among which an equity platform (EUR 600 million).

Target 329 refers to the equity platform distribution channel and requires that the Hellenic Development Bank of Investments shall have entered into legal financing agreements with funds for an amount necessary to use at least EUR 500 million of the equity support (taking into account management fees).

Target 329 is the tenth milestone or target of the investment, and it follows the completion of milestones 320 and 321 (due in Q3 2021) that were part of the first payment request, of milestones 322 and 323 (due in Q1 2022) and target 324 (due in Q4 2022) that were part of the second payment request, of target 325 (due in Q4 2023) that was part of the third payment request, of target 325a (due in Q2 2024) that was part of the fourth payment request, of target 326 (due in Q4 2024) that was part of the fifth payment request, and of target 327 that is part of the sixth payment request. It will be followed by: (i) target 330 concerning the InvestEU approval of operations of EUR 500 million (due in Q4 2025); (ii) target 327a concerning the signature with final beneficiaries of EUR 11 500 million of financial institutions funds (due in Q1 2026); (iii) target 329a concerning the signature of EUR 600 million of legal agreements with funds (due in Q1 2026); (iv) target 328 concerning the signature with final beneficiaries of EUR 13 268 million of financial institutions funds (due in Q2 2026); (v) milestone 328a concerning the completion of the investment by the Ministry of Finance (due in Q2 2026); and (vi) target 330a concerning the InvestEU approval of operations of EUR 800 million (due in Q2 2026).

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled	
2	Legal financing agreements with Halcyon Equity Partners S.C.A. SICAR	Copies of legal financing agreements with Halcyon Equity Partners S.C.A. SICAR (4 documents, dated 14.12.2023)

3	Legal financing agreements with EOS Hellenic Renaissance Fund II	Copies of legal financing agreements with EOS Hellenic Renaissance Fund II (4 documents, dated 06.03.2024, 18.06.2024, 19.06.2024, 28.06.2024)
4	Legal financing agreements with Golden Age Fund	Copies of legal financing agreements with Golden Age Fund (2 documents, dated 22.01.2025, 18.12.2025)
5	Legal financing agreement with Catapult	Copy of legal financing agreement with Catapult (1 document, dated 28.03.2025)
6	Legal financing agreements with Big Pi Growth	Copies of legal financing agreements with Big Pi Growth (2 documents, dated 23.06.2025, 25.11.2025)
7	Legal financing agreements with Elikonos 3	Copies of legal financing agreements with Elikonos 3 (3 documents, dated September 2025, 22.10.2025, 23.10.2025)
8	Legal financing agreement with Kos BioVentures AKES	Copy of legal financing agreement with Kos BioVentures AKES (1 document, dated 17.12.2025)
9	Legal financing agreements with BIG Pi Ventures II AKES	Copies of legal financing agreements with BIG Pi Ventures II AKES (2 documents, dated 18.01.2023, 18.02.2025)
10	Legal financing agreement with Uni.Fund II Venture Capital Mutual Fund VCMG (A.K.E.S.)	Copy of legal financing agreement with Uni.Fund II Venture Capital Mutual Fund VCMG (A.K.E.S.) (1 document, dated 28.06.2023)
11	Legal financing agreement with IGrow Venture Capital Fund	Copy of legal financing agreement with IGrow Venture Capital Fund (1 document, dated 26.04.2024)
12	Amended Mandate Agreement between the Hellenic Republic and the Hellenic Development Bank of Investments	Copy of the second amendment to the Mandate Agreement between the Hellenic Republic and the Hellenic Development Bank of Investments (dated 8 December 2025)
13	Hellenic Development Bank of Investments Implementation Report (Protocol number 221362 EI 2025)	Copy of the Implementation Report by the Hellenic Development Bank of Investments providing the implementation status of the two subprojects of the measure (Q-Equity and InnovateNow) (dated 18 December 2025)

3. Analysis:

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

The Hellenic Development Bank of Investments shall have entered into legal financing agreements with funds for an amount necessary to use at least EUR 500 million of the equity support (taking into account management fees).

Greece submitted the following documentary evidence for the two subprojects of the measure (Q-Equity and InnovateNow), which demonstrate that the aforementioned requirement is met. Specifically, the documentary evidence concerns: (i) the legal financing agreements between the Hellenic Development Bank of Investments (HDBI) and the funds established, which demonstrate the RRF contribution to those funds; (ii) the amended mandate agreement signed between the Hellenic Republic and HDBI and HDBI's Implementation Report, which demonstrate the amount of the management fees for each subproject.

1. Q-Equity:

Fund Name	Documentary evidence	RRF contribution (EUR million)
Halcyon Equity Partners S.C.A. SICAR	Evidence number 2	80
EOS Hellenic Renaissance Fund II	Evidence number 3	100
Golden Age Fund	Evidence number 4	70
Catapult	Evidence number 5	20
Big Pi Growth	Evidence number 6	65.1
Elikonos 3	Evidence number 7	60
Kos BioVentures AKES	Evidence number 8	19.5
Management Fees	Evidence numbers 12, 13	8.8
Total		423.4

InnovateNow:

Fund Name	Documentary evidence	RRF contribution (EUR million)
BIG Pi Ventures II AKES	Evidence number 9	34
Uni.Fund II Venture Capital Mutual Fund VCMG (A.K.E.S.)	Evidence number 10	18
IGrow Venture Capital Fund	Evidence number 11	25
Management Fees	Evidence numbers 12, 13	2.1

Total	79.1

Therefore, overall, the Hellenic Development Bank of Investments has entered into legal financing agreements with funds for an amount equal to EUR 502.5 million of the equity support, taking into account management fees.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Loan support

Number and name of the Target: 330 InvestEU approval of operations of EUR 500 million

Related Measure: 4,7.16980 RRP Loan Facility

Quantitative Indicator: Amount (million EUR)

Baseline: 0

Target: 500

Time: Q4 2025

1. Context:

The investment concerns the use of 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 shall make use of different distribution channels, among which the Member State compartment of the InvestEU Programme (EUR 800 million).

Target 330 refers to the InvestEU Programme distribution channel and consists of the approval by the InvestEU Investment Committee of investment operations amounting to EUR 500 million of the overall amount of financing targeted (or investment mobilised).

Target 330 is the eleventh milestone or target of the investment, and it follows the completion of milestones 320 and 321 (due in Q3 2021) that were part of the first payment request, of milestones 322 and 323 (due in Q1 2022) and target 324 (due in Q4 2022) that were part of the second payment request, of target 325 (due in Q4 2023) that was part of the third payment request, of target 325a (due in Q2 2024) that was part of the fourth payment request, of target 326 (due in Q4 2024) that was part of the fifth payment request, and of targets 327 and 329 that are part of the sixth payment request. It will be followed by: (i) target 327a concerning the signature with final beneficiaries of EUR 11 500 million of financial institutions funds (due in Q1 2026); (ii) target 329a concerning the signature of EUR 600 million of legal agreements with funds (due in Q1 2026); (iii) target 328 concerning the signature with final beneficiaries of EUR 13 268 million of financial institutions funds (due in Q2 2026); (iv) milestone 328a concerning the completion of the investment by the Ministry of Finance (due in Q2 2026); and (v) target 330a concerning the InvestEU approval of operations of EUR 800 million (due in Q2 2026).

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled	

2	European Investment Fund (hereinafter referred to as “EIF”) Annual Report (June 2025)	Copy of EIF Annual Report in respect of the InvestEU Member State compartment (Article 28(4) of the InvestEU Regulation) (June 2025)
3	InvestEU Investment Committee minutes (November 2023)	Copy of minutes of meeting number 20 of 8-10 November 2023 - Investment Committee of the InvestEU Fund
4	InvestEU Investment Committee minutes (February 2024)	Copy of minutes of meeting number 24 of 1 February 2024 - Investment Committee of the InvestEU Fund
5	InvestEU Investment Committee minutes (December 2025)	Copy of minutes of meeting number 47 of 4-5 December 2025 - Investment Committee of the InvestEU Fund
6	Amended InvestEU Contribution Agreement	Copy of Contribution Agreement between the Hellenic Republic and the European Union in respect of the Member State compartment under the InvestEU programme amending and restating the original Contribution Agreement (dated 13 November 2025)
7	Amended InvestEU Guarantee Agreement	Copy of Guarantee Agreement in respect of the Member State compartment under the InvestEU programme amending and restating the original Guarantee Agreement (internal document assessed by the European Commission)
8	InvestEU Policy Check Request Form	Copy of InvestEU Policy Check Request Form for EBRD operations (internal document assessed by the European Commission)

3. Analysis:

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

InvestEU Investment Committee approves investment operations amounting to EUR 500 million of the overall amount of financing targeted (or investment mobilised).

The EIF Annual Report (evidence 2), the InvestEU Investment Committee minutes of November 2023 (evidence 3), and the InvestEU Investment Committee minutes of February 2024 (evidence 4) demonstrate that the InvestEU Investment Committee approved the EIF investment operations for Greece’s Member State compartment amounting to EUR 400 million (Sustainability Guarantee - EUR 150 million; SME Competitiveness Guarantee - EUR 150 million; Innovation and Digitalization Guarantee - EUR 100 million).

The InvestEU Investment Committee minutes of December 2025 (evidence 5) , the amended InvestEU Guarantee Agreement (evidence 7), and the InvestEU Policy Check Request Form (evidence 8) demonstrate that the InvestEU Investment Committee approved the European Bank for

Reconstruction and Development (hereinafter referred to as "EBRD") investment operations for Greece's Member State compartment amounting to EUR 98.5 million (Sustainable Infrastructure Policy Window; Research, Innovation and Digitisation Policy Window).

In light of the above, the InvestEU Investment Committee approved investment operations amounting to EUR 498.5 million for EIF and EBRD.

In addition, Article 15.1 of the amended InvestEU Contribution Agreement (evidence 6) states that Greece's contribution stemming from the RRF to EBRD's InvestEU Advisory Hub is EUR 1.5 million. Article 15.2 further states that this contribution shall cover the EBRD Advisory Initiative for Sustainable Infrastructure and Research, Innovation and Digitisation Investments under Greece's InvestEU Member State compartment. Moreover, Annex I.2 of the amended InvestEU Contribution Agreement states that a payment of EUR 1.5 million concerning the RRF contribution to EBRD's InvestEU Advisory Hub has been completed.

The Council Implementing Decision required that the InvestEU Investment Committee approves investment operations amounting to EUR 500 million. The InvestEU Investment Committee approved EIF's and EBRD's investment operations amounting to EUR 498.5, while the rest of EUR 1.5 million concerned the RRF contribution to EBRD's InvestEU Advisory Hub that was not explicitly specified in the Council Implementing Decision. Whilst this constitutes a minimal numerical deviation of 0.3% 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.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Preliminary Assessment – M/T specific section: Loan support

Number and name of the Target: 379 My Home II - Legal agreements signed with final beneficiaries - 50%

Related Measure: 3,4.16400 Affordable Housing Programme "My Home II"

Quantitative Indicator: Percentage (%)

Baseline: 0

Target: 50

Time: Q4 2025

1. Context:

The measure concerns a public investment in the "My Home II" Facility, in order to incentivise private investment and improve access to finance in Greece's housing sector. The Facility shall operate by providing loans directly to the private sector. On the basis of the RRF Investment, the Facility "My Home II" aims at initially providing at least EUR 1000 million of financing.

Target 379 requires that financial intermediaries shall have entered into legal financing agreements with final beneficiaries for an amount necessary to use at least 50% of the RRF investment into the Facility "My Home II" (taking into account management fees).

Target 379 is the second milestone or target of the investment, and it follows the completion of milestone 378 (due in Q4 2024) that was part of the fifth payment request. It will be followed by: (i) target 380 requiring that financial intermediaries shall have entered into legal financing agreements with final beneficiaries for an amount necessary to use at least 100% of the RRF investment into the Facility "My Home II" (taking into account management fees) (due in Q2 2026); and (ii) milestone 381 requiring that Greece shall transfer EUR 1 000 million to the Hellenic Development Bank for the Facility (due in Q2 2026).

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled	
2	Hellenic Development Bank report	Copy of report by the Hellenic Development Bank (protocol number 20998 EI 2026, dated 05.02.2026) including information on the target completion.
3	Reports by financial intermediaries	Copies of 9 reports on the target completion submitted by the participating financial intermediaries (commercial banks), including the corresponding lists of loan contracts signed (dated 02.02.2026 and 03.02.2026).

4	Independent auditor's report	Copy of independent auditor's report verifying the target completion (protocol number 34176 EI 2026, dated 27.02.2026).
5	A randomly selected sample with a list of 60 legal financing agreements	Copy of a randomly selected sample including a list of 60 legal financing agreements, i.e. loan contracts for the purchase of primary residence (dated 12.02.2026).
6	60 randomly selected legal financing agreements	Copies of 60 randomly selected legal financing agreements, i.e. loan contracts for the purchase of primary residence (submitted on 12.02.2026).
7	Decision of the Minister of Finance, the Minister of Environment and Energy and the Minister of Social Cohesion and Family Affairs number 189973 ΕΞ 2024, Official Journal B 6894/16.12.2024, as amended by the following Decisions: 36574 ΕΞ 2025, Official Journal B 1066/07.03.2025; 52550 ΕΞ 2025, Official Journal B 1531/31.03.2025; 107294 ΕΞ 2025, Official Journal B 3167/24.06.2025; 200108 ΕΞ 2025, Official Journal B 6214/20.11.2025; 13337 ΕΞ 2026, Official Journal B 297/27.01.2026	Copy of the Decision (and amendments to that Decision) of the Minister of Finance, the Minister of Environment and Energy and the Minister of Social Cohesion and Family Affairs on the criteria for assessing the eligibility of 'My Home II' housing loan program to individuals funded by the Recovery and Resilience Facility, and on the procedure for allocating capital to the Hellenic Development Bank S.A. and financial institutions.
8	Excel spreadsheet of legal financing agreements with final beneficiaries	Copy of excel spreadsheet with aggregate information on all the legal financing agreements signed with final beneficiaries, (dated 03.02.2026).

3. Analysis:

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

Financial intermediaries shall have entered into legal financing agreements with final beneficiaries for an amount necessary to use at least 50% of the RRF investment into the Facility "My Home II" (taking into account management fees).

According to the documentary evidence submitted by the Hellenic Development Bank (evidence 2), financial intermediaries (commercial banks) (evidence 3), and an independent auditor (evidence 4), financial intermediaries have entered into legal financing agreements (8 811 loan contracts) with final beneficiaries for an amount equal to EUR 505 700 877 or 50.57% of the RRF investment into the Facility "My Home II" (taking into account management fees). This exceeds the minimum percentage required by the target (50%).

Following the selection of a random sample of 60 units (evidence 5), Greece submitted copies of 60 randomly selected legal financing agreements (evidence 6), i.e. loan contracts signed between commercial banks and final beneficiaries (individuals). Each selected legal financing agreement indicates that the loan is provided to individuals in the context of the Facility “My Home II” for the acquisition of a primary residence, and that the loan structure provides for 50% funding from the Facility ‘My Home II’ and 50% funding from participating banks (the Facility’s regulatory framework is included in the relevant Decisions of the Minister of Finance, the Minister of Environment and Energy and the Minister of Social Cohesion and Family Affairs, evidence 7). Moreover, the loan amount of each selected legal financing agreement in the sample corresponds to the loan amount of that agreement as included in the list with all legal financing agreements (evidence 8).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.