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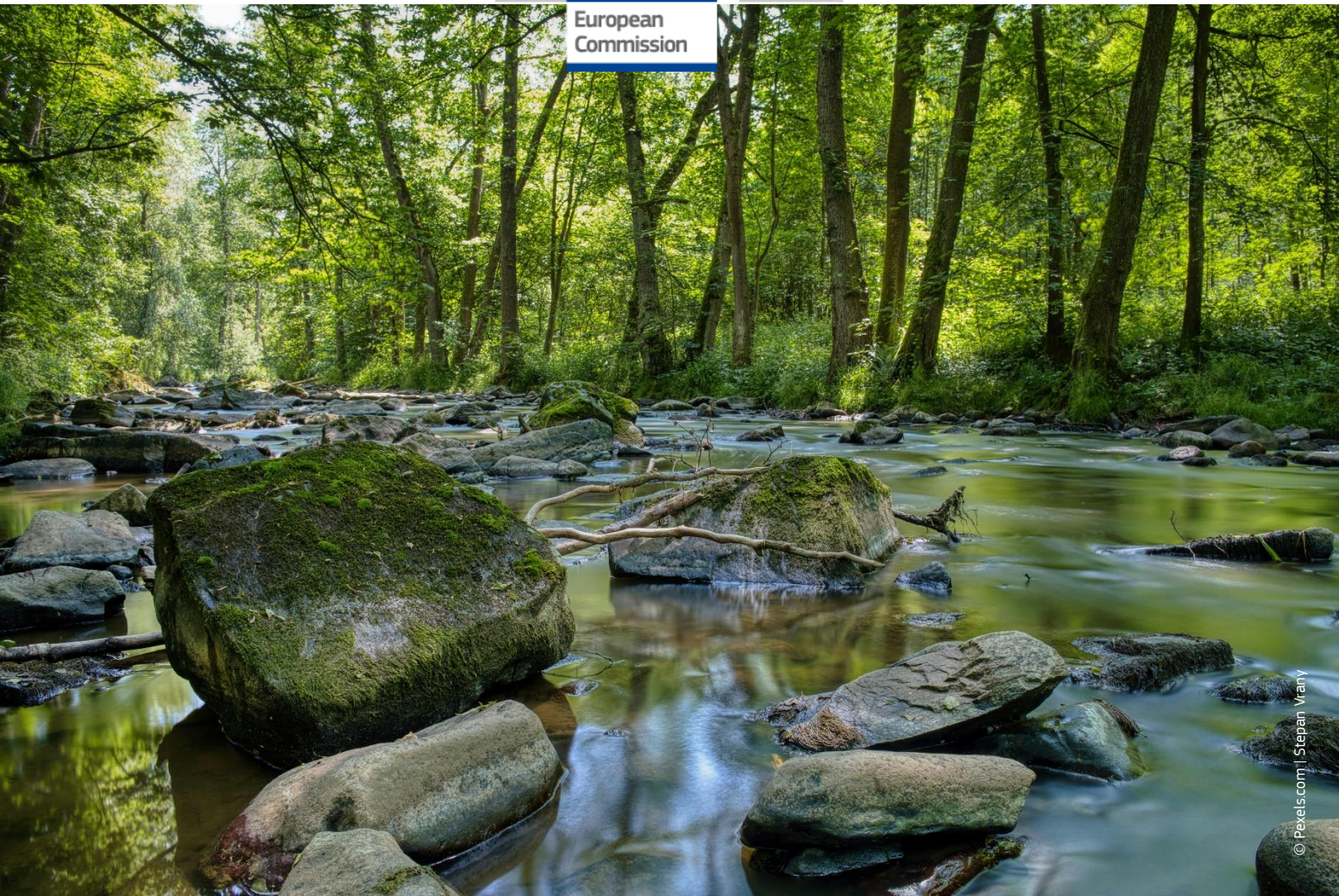
**Third River Basin Management Plans Second Flood Hazard and Risk Maps and
Second Flood Risk Management Plans
Member State: Greece**

Accompanying the document

**REPORT FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN
PARLIAMENT**

**on the implementation of the Water Framework Directive (2000/60/EC) and the Floods
Directive (2007/60/EC)
Third River Basin Management Plans
Second Flood Risk Management Plans**

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Country specific staff working document

Greece



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SECTION A:

WATER FRAMEWORK DIRECTIVE

1. General info, member state characterisation

Situated at the southern end of the Balkan peninsula, Greece is bordered by Bulgaria, North Macedonia and Albania to the north, and by Türkiye to the east. The Aegean Sea lies to the east of mainland Greece, while the Ionian Sea lies to the west. Greece consists of a mountainous peninsular mainland with a large number of islands. As for the islands, estimates range from somewhere between 1 200 and 6 000 depending on the minimum size considered. The number of inhabited islands is variously cited as between 166 and 227. It has a terrestrial area of close to 132 000km² and a marine area of nearly 48 800km² and bordered by four other countries. Greece has a population of 10.4 million people and a population density of 79.1 people per km² which is much lower than the EU average.

Greece has three types of climate that influence well-defined regions of its territory: the Mediterranean, Alpine and Temperate climate types. The first features mild, wet winters and hot, dry summers. The Aegean Islands and the south-eastern part of mainland Greece are mostly affected by this particular type. The Alpine type is dominant mainly in western Greece. Finally the Temperate type characterises the central and north-eastern parts of the country.

The average annual precipitation in Greece is 289mm (11.4in), and rainfall is concentrated in winter rather than summer, which is an obvious feature of the Mediterranean climate. In the western region, the mean annual precipitation is around 900-1 200mm, far more than that of the eastern region, which is 400-700mm. Two thirds of the territory of Greece is mountainous, making the country one of the most mountainous in Europe. Greece has the longest coastline in Europe, which exceeds 15 000km. Water needs are mainly covered by groundwater abstracted from aquifers. The use of groundwater resources has become particularly intensive in coastal areas in recent decades with intense urbanisation, the development of tourism and the expansion of irrigated land. The sources of groundwater pollution are:

seawater intrusion due to overexploitation of coastal aquifers,

fertilizers from agricultural activities, and

the disposal of wastewater.

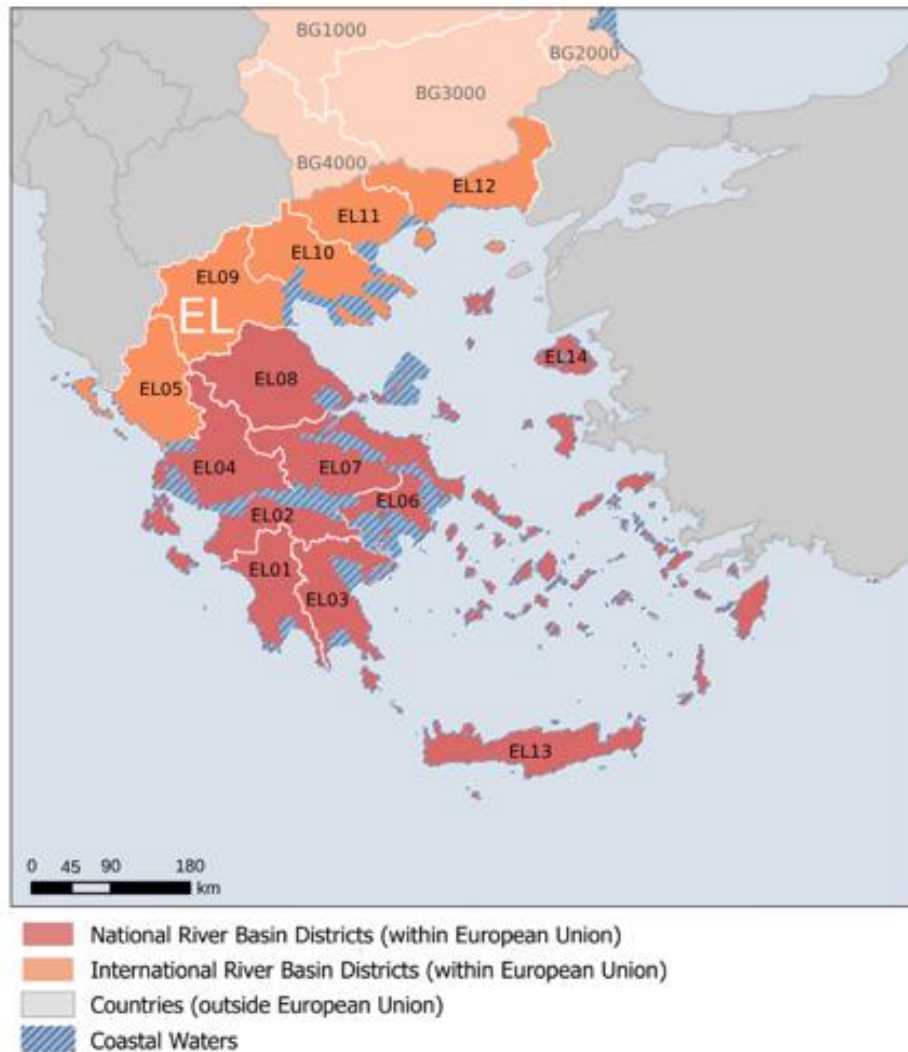
Greece ranks 31st in the top 50 countries with severe water stress. The major water use is for agricultural irrigation, accounting for 85% of total consumption, and the area of irrigated land has increased greatly in recent decades. As a result, there is a negative water balance in the coastal aquifer systems, which has triggered sea water intrusion with negative consequences for the socioeconomic development of these areas.

The Greek agricultural sector employs approximately 400 000 people, representing 10% of employment in all sectors. The farm labour force consists mainly of family holdings. More than 70% of the Greek agricultural sector faces natural or other specific constraints (for example: extreme

slopes, low temperatures, dryness of soil, unfavourable soil texture, borderline areas, island regions) which significantly affect the intensity of farming.

Currently, 34.63% of the terrestrial area of Greece are designated as nature-conservation protected areas, which is significantly above the EU value of 26.4%.

Map A - River Basin Districts



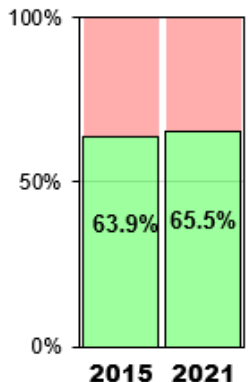
Reporting

The deadline for reporting on the 3rd river basin management plans (RBMPs) was in March 2022. The European Commission and the European Environment Agency (EEA), together with the EU Member States, developed an electronic reporting system in the Water Information System for Europe (WISE). The use of this system was voluntary. Some Member States used it to fulfil their obligations; others reported on their plans in pdf format. The cut-off date for the WISE e-reporting was September 2023, and the Member States were assessed based on the datasets available by this date.

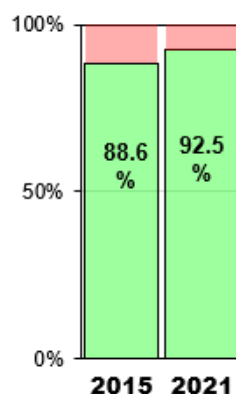
Greece did not consult, adopt and report its RBMP in accordance with the timetable set out by the Water Framework Directive (WFD). By December 2024, Greece had submitted a full electronic report and, therefore, the Commission's assessment of this report is based on this dataset.

Relevant documents are available at the EEA's EIONET Central Data Repository: <https://cdr.eionet.europa.eu/>.

Changes in Status, Pressures, Exemptions & Measures

Surface Water Bodies (1,681)		Trend (% good status/potential)	Main Pressures & Changes & Exemptions
ECOLOGICAL STATUS			Overall, the ecological status of surface water bodies (SWBs) in Greece has slightly improved since the 2nd RBMP in 2015. According to the electronic reporting, the share of water bodies with a good or better status increased from 63.9% in 2015 to 65.5% in 2021. By 2027, it is predicted that 84% of all surface water bodies will have a good or better ecological status/potential, which will mark an increase since the 3rd RBMP. The most significant pressure on surface water bodies is point source pollution from non-IED (Industrial Emissions Directive) plants (24% of surface water bodies are affected), followed by diffuse pollution from agriculture (14%). There are still unknown anthropogenic pressures affecting 13% of surface water bodies. Measures have been reported to tackle point source pollution in Greece (see the section below), as well as diffuse pollution from agriculture. Indicators of gaps in information on pressures were provided with the electronic reporting. Ecological flows (E-flows) have been defined for all relevant water bodies in 5 RBDs and for some of the relevant water bodies in 9 RBDs. Moreover, the defined E-flows have been fully implemented in 10 RBDs, and partially in 4 RBDs. Article 4(4) exemptions apply to 92 surface water bodies (5.5%) due to natural conditions, and to 205 surface water bodies (12.2%) for technical feasibility reasons. Article 4(5) exemptions apply to 271 surface water bodies (16.1%) due to infeasibility.

CHEMICAL STATUS



Overall, the chemical status of surface water bodies in Greece has slightly improved since the 2nd RBMP in 2015.

A range of frequencies for priority substances are in use for operational and surveillance monitoring ranging from once every six years, to twice a year for 42 out of 45 priority substances. Greece stated that a risk based approach was used to determine the relevance of priority substances. The assessment determined that hexabromocyclododecane, naphthalene, dioxins and furans were not relevant at the RBD level for all RBDs and were therefore excluded from monitoring programmes.

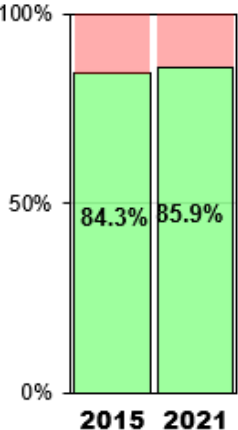
The list of top ten chemicals that cause failures is dominated by metals, with nickel, lead, mercury and cadmium all featuring in the top five. The remaining substances include pesticides, with cypermethrin the second most common substance creating Environmental Quality Standards (EQS) exceedances, and dichlorvos and dicofol also featuring in the top ten. The remaining substances are Polyaromatic Hydrocarbons (PAHs). Among the top ten, mercury, benzo(a)pyrene, and benzo(k)fluoranthene are ubiquitous, persistent, bioaccumulative and toxic (uPBT) substances.

By 2027, it is expected that 96.5 % of surface water bodies will have a good status.

Greece has also mapped key type measures (KTM) and gap indicators for several of these KTM, for example, nickel has KTM 2, 3, 14, 15, 16, 21 and 'other' reported for it, with a gap indicator of 'other' being provided. It is unclear what this gap is.

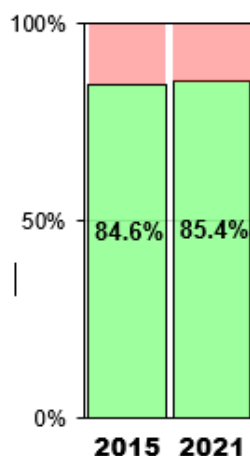
Article 4(4) exemptions apply to 72 surface water bodies (4.3 %) for technical feasibility reasons.

Article 4(5) exemptions apply to 48 surface water bodies (2.9 %) due to infeasibility.

Groundwater Bodies (588)	Trend (% good status/potential)	Main Pressures and Changes and Exemptions									
QUANTITATIVE STATUS	 <table border="1"> <thead> <tr> <th>Year</th> <th>Good (%)</th> <th>Failing (%)</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>84.3%</td> <td>15.7%</td> </tr> <tr> <td>2021</td> <td>85.9%</td> <td>14.1%</td> </tr> </tbody> </table>	Year	Good (%)	Failing (%)	2015	84.3%	15.7%	2021	85.9%	14.1%	There has been a slight increase in attributions of ‘good’ quantitative status in Greece. There is a significant increase in the number of groundwater bodies (GWBs) monitored. From the electronic reporting, 475 out of 588 GWBs (80.8% of total GWBs) are subject to quantitative status monitoring, while In the 2nd RBMPs, 324 out of 591 groundwater bodies (54.8%) were subject to quantitative monitoring. Groundwater associated aquatic ecosystems (GWAAEs) are reported, and they are considered in the groundwater quantitative status assessment in all 14 RBDs. Groundwater dependant terrestrial ecosystems (GWDTEs) are reported in 8 out of 14 RBDs, although they are considered in the groundwater quantitative status assessment in all RBDs¹. As regards the groundwater bodies that achieved ‘failing’ quantitative status: • 79 groundwater bodies (13.4% of total GWBs) have failed because the available groundwater resource is exceeded by the long-term annual average rate of abstraction and/or there is a human-induced decline in groundwater levels. • 17 groundwater bodies (2.9%) have failed to achieve ‘good’ quantitative status because of regional saline or other intrusions resulting from sustained anthropogenically induced changes in aquifer flow direction. 506 out of 588 groundwater bodies (86.1%) are expected to achieve good quantitative status by 2027. Greece has stated that there is a concession, authorisation, and/or permitting regime to control surface and groundwater abstractions and impoundments in all 14 RBDs. Article 4(4) exemptions apply to 79 groundwater bodies (13.4%) due to natural conditions, and to 4 groundwater bodies (0.768%) for technical feasibility reasons.
Year	Good (%)	Failing (%)									
2015	84.3%	15.7%									
2021	85.9%	14.1%									

¹ According to the 3rd RBMPs e-reporting, GWDTEs have been reported in: Attica RBD (EL06), Eastern Sterea Ellada RBD (EL07), Western Macedonia RBD (EL09), Central Macedonia RBD (EL10), Eastern Macedonia RBD (EL11), Thrace RBD (EL12), Crete RBD (EL13) and the Aegean Islands RBD (EL14). Greece has subsequently stated that the GWDTEs are considered in the status assessment in all RBDs.

CHEMICAL STATUS



There has been a slight increase in the number of attributions of a 'good' or better' chemical status in Greece.

According to the 3rd RBMPs electronic reporting, 91.8% of the total groundwater body area is monitored with chemical monitoring.

There has been a significant increase in the number of monitored groundwater bodies (GWBs). 485 out of 588 groundwater bodies (82.5% of total GWBs) are subject to chemical (surveillance and/or operational) monitoring, while in the 2nd RBMPs, 321 out of 591 GWBs (54.3%) were subject to chemical monitoring.

GWAAEs have been reported in all 14 RBDs, and are considered in the groundwater chemical status assessment². GWDTes are considered in the groundwater chemical status assessment in all RBDs, but are reported in 8 out of 14 RBDs³.

As regards the groundwater bodies that failed to achieve good chemical status:

- 60 GWBs (10.2% of total GWBs) failed due to a general water quality assessment resulting from significant environmental risk from pollutants across the groundwater bodies;
- 56 GWBs (9.5%) have failed to achieve good chemical status due to regional saline or other intrusions.

Pollutants causing failures include Chloride (9.4% of all GWBs), Nitrate (8.5%), electrical conductivity (6.5%), Sulphate (3.9%) and Ammonium (0.9%).

Gap analyses have been made for all pollutants causing failure in GWBs, in the form of the number of measures required and, in some cases, a gap indicator of 'other' for certain KTMs.

Article 4(4) exemptions apply to 86 GWBs (14.6 %) due to natural conditions, and to 1 GWB (0.217 %) for technical feasibility reasons.

² According to the 3rd RBMPs e-reporting, 3 out of 14 RBDs do not consider GWAAEs in the groundwater chemical status assessment: Western Sterea Ellada RBD (EL04), Epirus RBD (EL05) and Thessalia RBD (EL08). Greece has subsequently stated that the GWAAEs are considered in the groundwater chemical status assessment in all RBDs.

³ According to the 3rd RBMPs e-reporting, 8 out of 14 RBDs, where GWDTes are reported, also consider GWDTes in chemical status assessment. Greece has subsequently stated that the GWDTes are considered in the groundwater chemical status assessment in all RBDs.

2. Horizontal aspects



2.1 Governance

Water governance in Greece is quite complex. The RBMPs describe a complex water-governance framework involving authorities and bodies operating at national, regional and local levels. The Greek authorities have identified institutional fragmentation and coordination between different actors as issues requiring further attention.

Water management is assigned to the Greek Ministry of Environment and Energy, which sets water policy, coordinates efforts, and proposes legislation. The Ministerial Council approves the River Basin Management Plans (RBMPs), while the General Directorate of Water oversees national coordination and regional cooperation. Multiple ministries, such as Rural Development, Economy and Finance, Development, Health, Infrastructure and Transport, and Interior, also contribute at the national level. Regionally, Water Directorates and the Decentralised Administration Water Council (D.A.W.C.) manage water resources. The D.A.W.C. gives advice on RBMPs. Its structure and function can be adjusted by joint ministerial decision.

Decentralised administrations prepare the RBMPs or can delegate this to the General Directorate of Water. Depending on who drafts the plan, it is endorsed by either the Secretary of the Decentralised Administration or the General Water Director, before final approval by the Ministerial Council.

Regions and municipalities handle compliance, groundwater, irrigation management, project supervision, and pollution control. The General Directorate of Water also manages public consultations for River Basin Management Plans (RBMPs).

Greece reported, in December 2024, that it has 14 river basin districts (RBDs), each with its own River Basin Management Plan (RBMP) and 46 main river basins grouped into these.

Greece did not consult, adopt and report its RBMPs in accordance with the Water Framework Directive (WFD) timetable.

On the basis of available information, it is noted that Greece underwent a six-month public consultation process.

This process included three phases, involving: (i) publication of the scope and timetable for preparing the 3rd RBMPs online, (though it was unclear if delays were anticipated⁴; (ii) publication of the key water management issues, monitoring results, main pressures, and stakeholder roles on the Ministry's website as well as publication online of the draft RBMPs for comments and feedback.

Stakeholders, ranging from decision-makers, administrators, water users and consumers, to experts, NGOs, and educational institutions, were directly invited to participate. Associations, chambers of commerce, and farmers' or business associations represented users and consumers. A public webpage allowed members of the public to make comments, which remain accessible⁵.

It is noted positively that an 'Evaluation Report of the Consultation Results' summarised the changes made to the final RBMPs, including updated data, refined measures, corrections to responsible bodies, detailed descriptions of actions, and new targeted supplementary measures to improve water management outcomes.

⁴ <http://wfdver.ypeka.gr/el/consultation-gr>

⁵ Consulted on 13 May 2025: <https://wfdver.ypeka.gr/el/consultation-gr/2revision-consultation-gr/>

On coordination with other directives, including the Floods and Marine Strategy Framework Directives, the 3rd RBMPs state that Floods Directive implementation stages should be repeated every six years, in sync with the Water Framework Directive. However, when the 3rd RBMPs were published, the 2nd flood risk management plans (FRMPs) were still being developed and expected by 2024, so planning and consultation phases were not coordinated in this cycle. While the Programmes of Measures (PoMs) in the 3rd RBMPs cover basic EU Directive measures, they lack explicit references to the Floods Directive and do not clarify how its objectives are addressed. Nonetheless, some actions, such as studies for the Anthemounta and Axios Rivers, aim at ecological restoration and improved flood management.

Much stronger coordination can be seen on the basis of a source-to-sea approach between freshwater and marine environment management. Indeed, the 3rd RBMP outlines the objectives of the Marine Strategy Framework Directive (MSFD) and related measures. These include establishing ongoing monitoring of marine waters, identifying the responsible authorities, creating a National Committee for Marine Environmental Strategy, and holding public consultations for planning actions to achieve good environmental status. The updated MSFD monitoring programme (2022) aligns with the WFD monitoring programme to enhance coverage, and data from WFD monitoring supported Greece's MSFD assessment, completed in June 2025.

Greece shares transboundary water resources with Albania, North Macedonia, Serbia, Bulgaria and Türkiye. All relevant RBDs except Epirus include international cooperation in their management plans. Cooperation levels vary, and formal agreements or cooperation bodies, outlined below, exist for each shared RBD, though none have an International River Basin Management Plan (IRBMP).

The RBMP for the Western Macedonia RBD details international cooperation between Greece, Albania and North Macedonia on the Prespa lakes. It notes bilateral efforts between Greece and Albania, formalised by a 2003 agreement establishing a Permanent Greek-Albanian Committee on Transboundary Freshwater Issues.

Cooperation between Greece and North Macedonia stems from a 1959 agreement with Yugoslavia on hydro-economic matters, leading to a permanent committee overseeing Axios, Doirani, and Prespa. A general statement indicates that, within the framework of the project *“Assessment of the degree of expression of the functions and values of the transboundary Doirani Lake”*, a number of agro-environmental measures have been proposed. These measures aim to: (i) reduce the total irrigated area; (ii) raise public awareness of the implementation of irrigation practices that lead to water saving; (iii) establish experimental crops; and (iv) examine the possibility of increasing water inflows to the lake, while complying with the requirements set by the current legislation for the assessment of environmental impacts.

The RBMP for the Eastern Macedonia RBD describes cooperation with Bulgaria on the Strymon/Struma and Nestos/Mesta rivers.

In May 2025, Greece and Bulgaria also signed a Joint Ministerial Declaration on the use of the Ardas River. The agreement is not included in the 3rd RBMPs because it was signed after their publication. None of the international RBDs have developed an IRBMP.

The 3rd RBMP PDF documents do not mention any specific international cooperation related to water abstraction or scarcity concerns in the transboundary RBDs involving Greece and neighbouring countries. These include Epirus (such as the Aoos river, shared with Albania), Western Macedonia (the Prespes lakes, shared with Albania and North Macedonia), Central Macedonia (the Axios river and Doirani lake, shared with North Macedonia), Eastern Macedonia (the Strymon river and Nestos river,

shared with Bulgaria), and Thrace (the Nestos river, shared with Bulgaria, and Evros river, shared with Bulgaria and Türkiye).



2.2 Characterisation of River Basin District

Surface water bodies: In Greece, there are a total of 1 681 surface water bodies. River, lakes, transitional, and coastal waters have been delineated but no territorial waters. The characterisation of surface water bodies identifies important water bodies and defines their outer boundaries. The significance of a surface water body is mainly related to its size, but the characterisation does enable the distinction of small water bodies. The boundaries between different categories of aquatic systems are recognised.

Groundwater bodies: In the 3rd RBMPs, Greece identified 588 groundwater bodies (a slight decrease from the previous cycle), including 24 transboundary bodies and only minor adjustments to total area⁶. Groundwater characterisation takes into account hydrogeological factors, aquifer capacity, groundwater use, interdependence with surface waters and terrestrial ecosystems, and areas at risk due to pressures.

Table 1. Overview of the Greece's River Basin Districts and the number of water bodies per RBD

RBD	Rivers	Lakes	Transitional	Coastal	Groundwater
Western Peloponnese (EL01)	111	2	3	11	27
Northern Peloponnese (EL02)	64	5	5	19	34
Eastern Peloponnese (EL03)	80	1	5	13	34
Western Sterea Ellada (EL04)	96	11	5	9	26
Epirus (EL05)	83	4	7	13	40
Attica (EL06)	15	1	0	14	24
Eastern Sterea Ellada (EL07)	81	3	1	19	45
Thessalia (EL08)	72	3	0	7	34
Western Macedonia (EL09)	155	15	2	2	48
Central Macedonia (EL10)	104	6	3	11	38
Eastern Macedonia (EL11)	83	2	1	4	15
Thrace (EL12)	176	7	5	12	18
Crete (EL13)	118	6	4	25	91

⁶ The 24 GWBs characterised as transboundary in the 3rd RBMPs e-reporting are: EL050A070, EL050A190, EL050A060, EL090F321, EL090F040, EL090F291, EL090F301, EL090F090, EL09AF010, EL090A351, EL090F271, EL090F013, EL1000031, EL100F040, EL1000032, EL110B020, EL11FB080, EL110B110, EL110B030, EL120B100, EL12BT010, EL12BT150, EL120T020 and EL120B090. It is noted that Greece reported 23 GWBs as transboundary in the 2nd RBMPs e-reporting.

Aegean Islands (EL14)	81	9	0	87	114
Total in Greece	1319	75	41	246	588

Source: WISE electronic reporting

The WFD requires the setting of type-specific reference conditions for biological quality elements and type-specific conditions for hydromorphological and physico-chemical quality elements. These represent the values of such quality elements at high ecological status.

It is to be welcomed that in Greece all surface water types across all categories have either some or all of the type-specific reference conditions/type-specific conditions established for biological quality elements, hydromorphological quality elements, and physico-chemical quality elements. There are no surface water types that have not established type-specific reference conditions/type-specific conditions.

Since the 2nd RBMPs, there have been increases in the percentage of transitional and coastal water types with type-specific conditions established for hydromorphological quality elements and physico-chemical quality elements.

Pressures and impacts on SWBs

The pressures affecting the highest percentage of surface water bodies (Figure 1) are:

1. 24%: point source pollution from plants not falling under the scope of the Industrial Emissions Directive (IED) - this is an increase since the 2nd RBMPs where 12% of surface water bodies were affected by non-IED plants;
2. 14%: diffuse pollution from agriculture;
3. 13%: unknown anthropogenic pressures affecting surface water bodies.

In Greece, the most frequent hydromorphological pressures can be classified in the following categories: 'Physical alteration of channel/bed/riparian area/shore', followed by 'Dams, barriers and locks', 'Hydrological alteration', 'Physical loss of whole or part of the water body' and 'Other'.

The impacts affecting the highest percentage of surface water bodies (Figure 2) are:

1. chemical pollution, with 27% of surface water bodies affected;
2. diffuse pollution from agricultural sources, which affects 12%.

In the 2nd RBMPs, nutrient pollution from various sources caused the most widespread impact, affecting 17% of surface water bodies.

Pressures and impacts in GWBs

The pressures affecting the highest percentage of groundwater bodies (Figure 1) are:

1. abstraction for agriculture (18%); and
2. diffuse pollution from agricultural sources, which affects 12% of groundwater bodies.

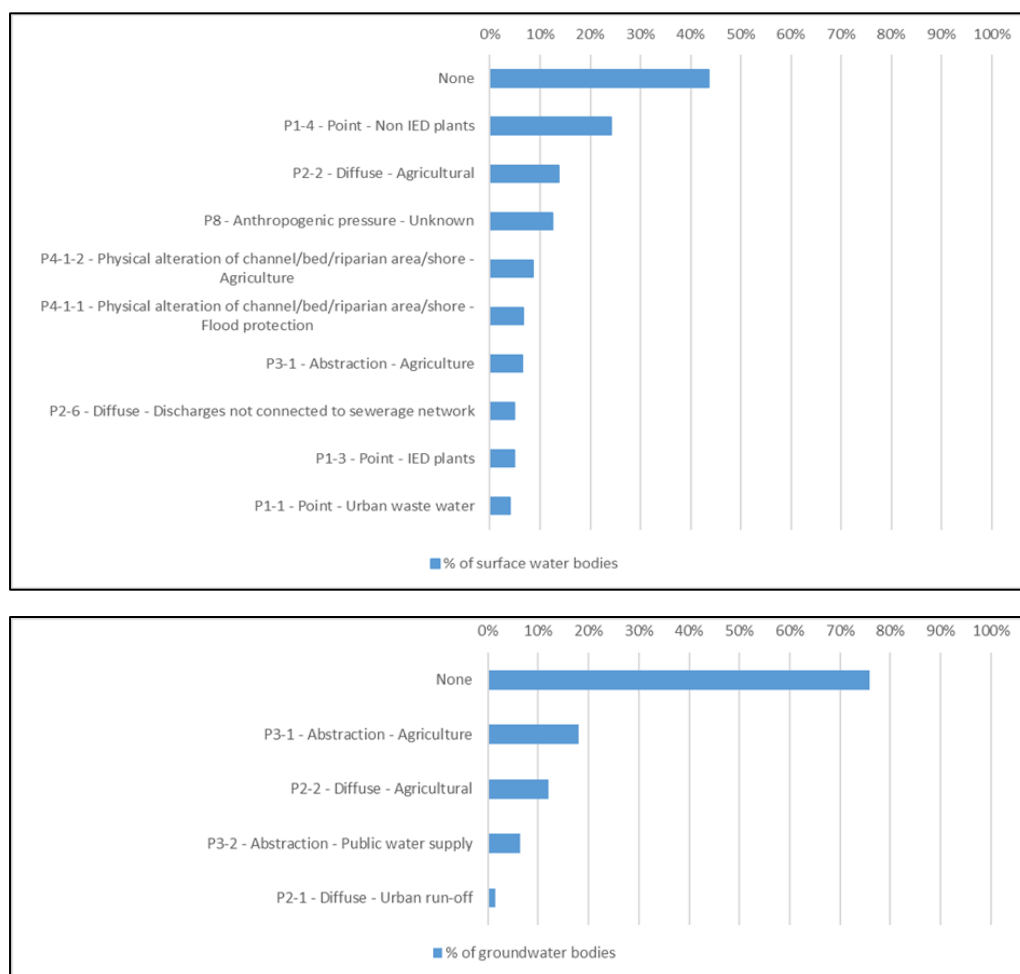
These percentages show a marked reduction compared to the previous cycle since the 2nd RBMPs where 25% of groundwater bodies were affected by abstraction for agriculture and 26% were affected by diffuse agricultural pollution.

The impacts affecting the highest percentage of groundwater bodies (figure 2) are:

1. saline or other intrusion (affecting 12%);
2. water balance/lowering of the water table, with 9 % of groundwater bodies affected.

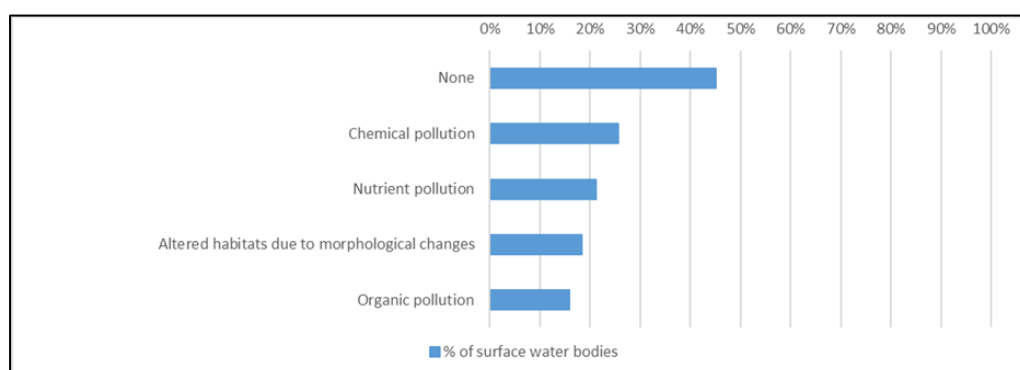
These most significant impacts are similar to those of the 2nd RBMPs, and are also similar to the percentage of groundwater bodies affected in the 2nd RBMPs.

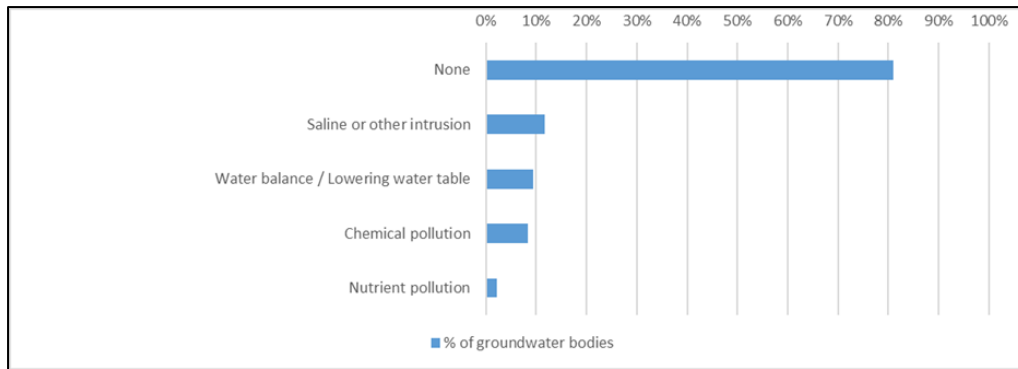
Figure 1. The most significant pressures on surface water and groundwater bodies in Greece in the 3rd RBMPs (expressed as percentages of numbers of water bodies)



Source: WISE electronic reporting

Figure 2. The most significant impacts on surface water and groundwater bodies in Greece in the 3rd RBMPs (expressed as percentages of numbers of water bodies)



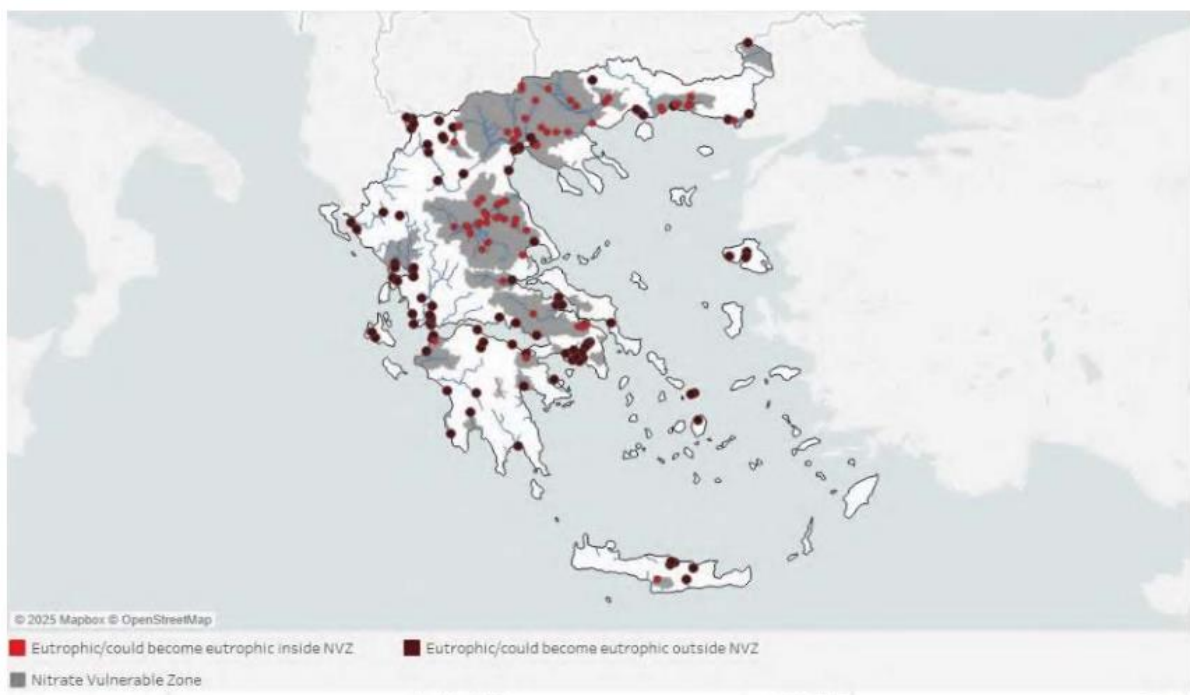


Source: WISE electronic reporting

Agriculture land covers approximately 38.8% of Greece, while forest and semi-natural areas account for 56.3%⁷. Around 17% of agricultural land is managed under organic farming⁸.

The excess of nutrients discharged into the surface waters leads to eutrophication causing proliferation of algal blooms and oxygen depletion. In its reporting as required by the Nitrates Directive reporting⁹, Greece has indicated that many monitoring points across the country show surface waters as eutrophic or at risk of becoming eutrophic (Figure 3).

Figure 3. Eutrophic/could become eutrophic monitoring points in Greece, according to the reporting of the Nitrates¹⁰



⁷ <https://www.eea.europa.eu/en/analysis/maps-and-charts/land-cover-and-change-statistics-dashboards>

⁸ Eurostat - Developments in organic farming in 2021:

https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Developments_in_organic_farming

⁹ https://environment.ec.europa.eu/publications/implementation-nitrates-directive-country-reports_en

¹⁰ NITRATES DIRECTIVE - Reporting Period 8 (2020-2023) – trophic status:

<https://water.jrc.ec.europa.eu/portal/apps/dashboards/cb6034c2a75e4df282f8a62f90c16caa>

3. Policy elements contributing to biodiversity and climate change adaptation



3.1 Surface Water: what is their ecological status or potential

Monitoring

There has been a slight reduction in the number of sampling sites compared to the 2nd RBMPs. There are two main types of monitoring: i) operational monitoring to determine the status of all water bodies at risk of not reaching the environmental objectives and ii) surveillance monitoring aimed rather at providing an assessment of the overall status of surface water within the river basin district, as well as identifying impacts and long-term changes.

Operational monitoring, it covers 20% of the river length, 62% of the lake area, 96% of the transitional area, and 20% of the coastal area. Surveillance monitoring, it covers 22% of the river length, 34% of the lake area, 12% of the transitional area and 30% of the coastal area.

All required biological quality elements are included in monitoring, to various degrees. The most monitored biological quality elements are benthic invertebrates in rivers, transitional and coastal waters, and phytoplankton in lakes. Phytoplankton in rivers and phytobenthos in lakes are not monitored, although in both cases, other types of flora are monitored in types of site.

The extent of monitoring across the different water bodies diverges quite considerably and is broadly incomplete.

Not all of the required physico-chemical or hydromorphological quality elements are being monitored. This is the case for thermal and salinity conditions in coastal waters; transparency conditions, thermal conditions, acidification status, and salinity in lakes. For lakes, it is worth mentioning that monitoring of the quality of nutrient conditions only includes phosphorus conditions, and does not include nitrogen conditions, however it is not mandatory to include both. In rivers, while all the required quality elements are being monitored, some elements have a very low coverage. These include thermal conditions, salinity conditions and acidification status, which are monitored at less than 1% of monitoring sites.

Regarding hydromorphological quality elements, the hydrological or tidal regime is not monitored in rivers and transitional waters. River basin specific pollutants are monitored in rivers and lakes but there is limited monitoring in transitional waters and no monitoring in coastal waters.

Status assessment

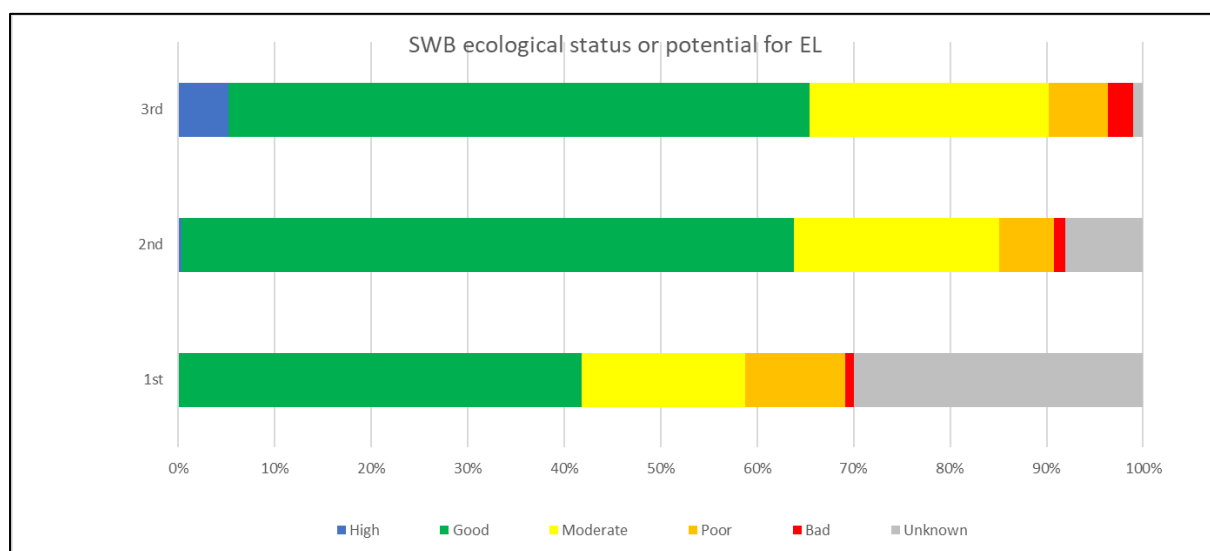
There are some surface water bodies where the assessment does not include any biological quality elements. This concerns 3% of river water bodies, 27% of lake water bodies, 5% of transitional water bodies, and 2% of coastal water bodies.

The percentage of surface water bodies with good or above ecological status or potential has slightly increased from 63.9% in the 2nd RBMPs to 65.5% in the 3rd RBMPs (Figure 4). There is also a fall in the proportion of surface water bodies with unknown status or potential, decreasing from 8% in the 2nd RBMPs to 1% in the 3rd RBMPs. However, the share of surface water bodies with moderate, poor, or bad status or potential has increased since the 2nd RBMPs from 28% to 34%. By 2027, it is forecasted that 84% of surface water bodies will have a good or above status or potential which would be a significant improvement from the 3rd RBMPs.

As was the case in the 2nd RBMPs, the confidence in status classification remains low for nearly all classifications, especially for water bodies classified with a good or high status. This can mainly be attributed to insufficient monitoring. The absence of monitoring is not always compensated by grouping or expert judgement.

A high number of classifications do not use hydromorphological quality elements, physico-chemical quality elements, or RBSPs.

Figure 4. Ecological status or potential of surface water bodies in Greece in the 1st, 2nd, and 3rd RBMPs



Source: WISE electronic reporting



3.2 Hydromorphological changes and artificialisation (HMWBs and AWBs)

The hydromorphological characteristics of surface water bodies concern the hydrological conditions (e.g., the quantity and dynamics of water flow, the connection of rivers and lakes to groundwater bodies, wave exposure of transitional and coastal water bodies), the morphological conditions (e.g., variation in depth, and width in the structure and substrate of the bed, the structure of the riparian zone), and in the case of river water bodies, river connectivity.

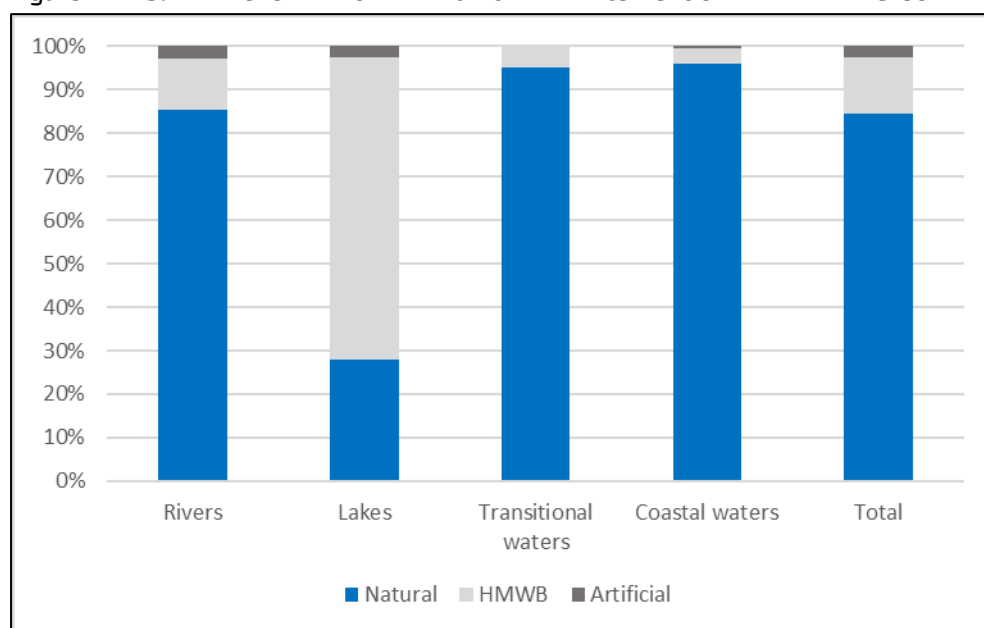
Some surface water bodies are such that the changes in hydromorphological characteristics of the water body which would be necessary to achieve good ecological status (GES) would have significant adverse effects on the wider environment or on other uses including navigation, flood protection, hydropower, and irrigation. Member States can, in such cases, designate these waterbodies as Heavily Modified Water Bodies (HMWB) or Artificial Water Bodies (AWB), whose environmental objective is Good Ecological Potential (GEP) instead of GES.

Greece has designated a total of 218 water bodies as heavily modified comprising 155 rivers, 52 lakes, 2 transitional waters and 9 coastal waters. It has designated a total of 41 artificial water bodies comprising 38 rivers, 2 lakes and 1 coastal water (Table 2). Compared to the 2nd RBMPs, the number of HMWBs has increased by 7 and the number of AWBs has remained the same. The percentage of SWBs designated as heavily modified or artificial is shown in Figure 5.

Table 2. Number of heavily modified, and artificial water bodies by water category and total

Modifications	Rivers	Lakes	Transitional waters	Coastal waters
HEAVILY MODIFIED	155	52	2	9
ARTIFICIAL	38	2	0	1

Figure 5. Level of human intervention in Greek water bodies



Source: WISE electronic reporting

According to the status assessment, as regards heavily modified waterbodies: 49 have good ecological potential, 126 moderate, 19 poor, and 7 have bad ecological potential, while 17 have unknown ecological potential.

Considerable progress is still needed to comply with environmental objectives, Indeed, as regards artificial waterbodies, 6 have good ecological potential, 23 moderate, 9 poor, and 3 have bad ecological potential. The method for assessing good ecological potential is based on the CIS Guidance Document No. 37 (Steps for defining and assessing ecological potential for improving comparability of HMWBs) and relies primarily on the mitigation measures approach. According to the RBMPs, biological quality elements are used in the assessment of good ecological potential, although details are not provided. An annex accompanying the RBMPs lists the measures required to achieve good ecological potential in HMWBs



3.3 Groundwater bodies – have they sufficient water – quantitative status

Compared to the previous cycle, the total groundwater body area remained nearly the same, with most boundaries unchanged but a few re-delineated through merging or splitting. There are 24 transboundary groundwater bodies¹¹.

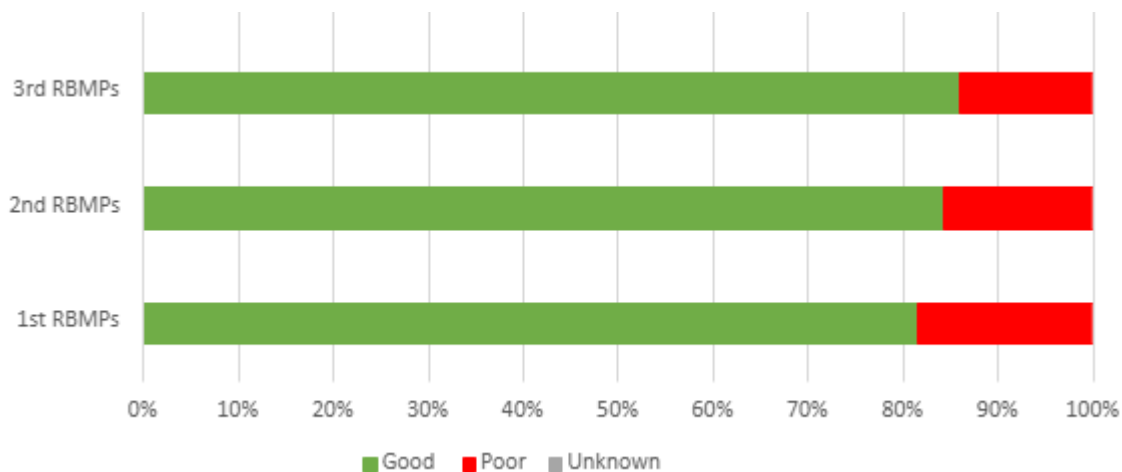
A considerable effort has been made to increase the share of groundwater bodies which are subject to quantitative monitoring (now 80.8%, up from 54.8% in the 2nd RBMPs). However, a significant proportion of groundwater bodies (19.2%) are still not being monitored for their quantitative status. Hence, it is unclear how the status assessment has been established for the groundwater bodies that are unmonitored.

According to the Greek authorities, the criterion of ‘available groundwater resource’ was fully applied in all RBDs in accordance with Article 2(27) of the WFD. However, it is noted with concern that while it is required by law, Greece acknowledges that the needs of terrestrial ecosystems have not been considered in the definition of ‘available groundwater resource’ in: Western Macedonia RBD (EL09), Eastern Macedonia RBD (EL11), Thrace RBD (EL12), Crete RBD (EL13) and the Aegean Islands RBD (EL14).

In Greece’s 3rd RBMPs electronic reporting, 85.9% of groundwater bodies had a good quantitative status by 2021, (Figure 6). This reflects a consistent improvement in the quantitative status of groundwater bodies that would need to be explained in the face of increasing water scarcity in the Mediterranean region.

For the groundwater bodies with a poor status, most failed due to excessive abstraction or human-induced groundwater decline. Few failed due to saline intrusions.

Figure 6. Quantitative status of groundwater bodies in the 1st, 2nd and 3rd RBMPs



Source: WISE electronic reporting



3.4 Protected Areas (identification, monitoring, objectives and measures)

There are different reasons why certain water bodies are protected by law, and different protections apply. For surface water bodies, designated protected areas include drinking water protection areas,

¹¹ The 24 GWBs characterised as transboundary in the 3rd RBMPs e-reporting are: EL050A070, EL050A190, EL050A060, EL090F321, EL090F040, EL090F291, EL090F301, EL090F090, EL09AF010, EL090A351, EL090F271, EL090F013, EL1000031, EL100F040, EL1000032, EL110B020, EL11FB080, EL110B110, EL110B030, EL120B100, EL12BT010, EL12BT150, EL120T020 and EL120B090. It is noted that Greece reported 23 GWBs as transboundary in the 2nd RBMPs e-reporting.

bathing waters under the Bathing Water Directive, Natura 2000 sites under the Birds and Habitats Directive, nitrate vulnerable zones under the Nitrates Directive, Sensitive Areas under the Urban Wastewater Treatment Directive, and areas designated for the protection of aquatic species of economic importance.

The number of groundwater bodies identified as drinking water protected areas decreased to 111 (from 118 in the 2nd RBMPs). Ten groundwater bodies were removed from this list, while three were added for the first time¹², as they recently started to be used for water supply purposes. Greece has not yet completed legally formalised conservation objectives and management plans for its Natura 2000 sites.

Monitoring sites have been established for surface and groundwaters covering each type of protected area. Since the 2nd RBMPs, there have been changes in the number of monitoring sites within protected areas. For drinking water protected areas, the number of monitoring sites has decreased in rivers but increased in lakes and groundwater bodies. However, Greece states that there has been no reduction in the number of monitoring sites, but there have been changes in their location.

For the number of monitoring sites, the results are nuanced:

The number of bathing sites and Natura 2000 areas has fallen, however, Greece has subsequently stated that there has been no decrease in the number of monitoring sites associated with bathing waters;

The number of sites for nitrate vulnerable zones and sensitive areas has increased.

With regard to SWBs (see Figure 7):

The results seem to be nuanced, with a slight fall in protected areas with good or above ecological status or potential, from 61.4% in the 2nd RBMPs to 60.5% in the 3rd RBMPs. At the same time, there has been a noticeable improvement in SWBs associated with protected areas with high ecological status or maximum potential, from 0.5% in the 2nd RBMPs to 7.3% in the 3rd RBMPs.

An improvement can be seen in the percentage of protected areas with a good chemical status, from 87.6% in the 2nd RBMPs to 90.5% in the 3rd RBMPs.

An improvement can be seen in the level of knowledge, since there are noticeable decreases in the number of unknown assessments: from 8.8% in the 2nd RBMPs to 1.4% in the 3rd RBMPs for ecological status or potential, and from 10.4% in the 2nd RBMPs to 0.3% in the 3rd RBMPs for chemical status.

With regard to GWBs (see Figure 7):

the percentage of protected areas with a good quantitative status has increased from 83.5% in the 2nd RBMPs to 90.7% in the 3rd RBMPs;

the percentage of protected areas with a good chemical status has increased from 84.4% in the 2nd RBMPs to 89.3% in the 3rd RBMPs.

It is noted positively that additional objectives have been applied to some water bodies associated with Natura 2000 protected areas, drinking water protection areas, and shellfish designated waters.

¹² EL0700350, EL0900075 and EL0900076.

However, it is noted with concern that no additional measures have been designed to reach these additional objectives.

Figure 7. Progress in the status of water bodies associated with protected areas in the 2nd RBMPs (2016) and 3rd RBMPs (2022).



Source: WISE electronic reporting



3.5 What is being done to prevent/reduce hydromorphological pressures

In 5 RBDs (Attica, Eastern Sterea Ellada, Central Macedonia, Eastern Macedonia, Crete), ecological flows have been defined for all relevant water bodies, whereas for the other 9 RBDs, this has been done for only some water bodies. Ecological flows have been partly implemented for some water bodies. In Greece, the definition of ecological flows has changed since the 2nd RBMP. However, no other details have been provided in the 3rd RBMPs.

Measures to tackle hydromorphological pressures fall under several KTMs, including: KTM 5 – Improving longitudinal continuity; KTM 6 – Improving hydromorphological conditions of water bodies other than longitudinal continuity; KTM 7 – Improvements in flow regime and/or establishment of ecological flows; KTM 14 – Research activities; and KTM 17 – Measures to reduce sediment from soil

erosion and surface run-off. Notably, measures reported under KTM 5 are described mainly as aiming to achieve good ecological potential in HMWB, whilst one measure is dedicated to improving the sustainability of the fish population.

Such measures include:

- Identification of selected sediment extraction areas for the purposes of technical works (MXXB0905)
- Monitoring, recording and restoration of coastal erosion (MXXB0906)
- Measures for the identification and achievement of good ecological potential in HMWBs (MXXB0907)
- Development of methodological measures such as determination of the maximum range of reservoir level fluctuation (MXXB0902).

It is noted that although an Annex is also provided alongside the 3rd RBMP, which focuses on measures required for good potential in HMWBs, no such annex is found for water bodies that are not HMWBs.



3.6 What Greece is doing for abstractions and water scarcity

Water abstraction remains a significant pressure across all 14 RBDs in Greece, affecting both groundwater and surface water bodies. The sectors causing most abstraction pressures on groundwater are agriculture, public water supply, and, to a lesser extent, industry. The pressure from agriculture has remained consistent since 2015, while the impact of the public water supply has increased. This seems at odds with the good and improving quantitative status of groundwater bodies that has been reported (see section 3.3)

The number of SWBs that have not achieved good ecological status or potential and which are significantly affected by water abstraction has more than doubled from the previous cycle (from 2.4% to 6.1%).

According to data on the Water Exploitation Index+ (WEI+) reported by Greece, the highest annual WEI+ values were in Central Macedonia (22%), Eastern Macedonia (18%), Thrace (17%), Crete (11%), and the Aegean islands (7%). The annual figures may hide the fact that the overexploitation of the resource can be significantly higher in certain seasons. Indeed the WEI+ in August 2020 in Crete in August 2020 was 99% and 76% in Eastern Macedonia in September 2020.¹³

Drought management plans have been drawn up and are being updated, with several already completed and more forthcoming. These plans set indicators for drought forecasting, early warning, and operational procedures.

The 3rd RBMPs lack a forward-looking analysis of future water demand or availability under different climate or socio-economic scenarios and do not break down consumptive use trends by sector. Measures to address scarcity include promoting ecological flows, regulating abstractions, upgrading irrigation systems, and encouraging drought-resistant crops under the common agricultural policy (CAP) strategic plan.

Wastewater reuse is still limited and abstraction estimates often rely on proxy data, leading to uncertainties. Methodological gaps persist in quantifying groundwater and actual abstraction levels by sector and probably also in the RBMP quantitative assessments.

¹³ <https://www.eea.europa.eu/en/analysis/indicators/use-of-freshwater-resources-in-europe-1>

The National Water Strategy was formally adopted on 30 July 2026¹⁴ aiming to combat mounting water scarcity. The five-pillar strategy aims to overhaul the country's fragmented water management system and prepare for long-term challenges posed by the climate crisis. Reservoir levels across the country have dropped sharply, with water reserves in the greater Athens area in July 2025 being more than 50% lower than in 2022.

The strategy includes: (i) affirming water as a public good in accordance with the Constitution and top court rulings; (ii) supporting sustainable and affordable services for water supply, irrigation and sewage; and (iii) implementing centralised, integrated planning for both large-scale and small-scale infrastructure projects. It also calls for urgent short-term measures, alongside a national public awareness campaign. Finally, the strategy prioritises the use of new technologies, such as desalination, recycling, and water reuse systems.

The strategy is also designed to boost efficiency, improve service delivery, and attract investment in critical infrastructure.

Main water uses

Greece, as required by the WFD, reports consumptive water use data at the RBD level, including groundwater and surface water abstraction for agriculture, the public water supply, and industry (including energy). Data on desalinated water, imports, and exports are also included.

The 3rd RBMP documents provide estimated abstraction volumes by use (agriculture, public water supply, industry, other uses) at both national and sub-basin levels. However, abstractions for energy production, such as cooling and hydropower, are only noted as significant for certain surface water bodies, without detailed figures or trends by use.

The main water users in Greece are agriculture (80.4%), the public supply (16.7%), and the manufacturing industry (1.8%). Total abstractions have remained first time¹⁵,

Metering and reporting are mandatory for all users, however, the requirement for agricultural uses will not be effective before the end of 2026.

Measures

Basic and supplementary measures have been implemented to address water abstraction across all 14 RBDs, focusing on areas where abstraction pressures put the status of water bodies at risk.

All RBDs require permits for all surface and groundwater abstractions and impoundments, with no minimum thresholds below which abstractions do not require permits and control. These concessions, authorisations, and/or permits control surface and groundwater abstractions and impoundments in all 14 RBDs. All permits are time-limited, reviewed every six years, and can be refused or revised to meet environmental objectives. Registers of abstractions and impoundments are maintained in 13 RBDs¹⁶ but not for the Western Macedonia RBD (EL09).

¹⁴ National Printing Office. (2026). Act of the Ministerial Council No. 22 (Approval of the National Strategy for Water) (Government Gazette of the Hellenic Republic, Issue A, No. 126/06.08.2026). Athens: National Printing Office.

¹⁵ EL0700350, EL0900075 and EL0900076.

¹⁶ 3rd RBMPs e-reporting (rbmppom_targetedq)

E-flows are defined for all relevant water bodies in 5¹⁷ RBDs and partially in 9¹⁸; fully implemented in 10¹⁹, and partially in 4 RBDs²⁰. The link between ecological-flows and permitting is only partially established, with ongoing work and further measures planned in the 3rd RBMPs.

National authorities conduct checks to prevent unauthorised abstractions. The 3rd RBMPs also introduce measures to increase water supply, including natural water retention and reuse. This is complemented by other structural measures like boreholes, dams and reservoirs.

International Cooperation



3.7 Adaptation to climate change

Long-term projections indicate increasing temperatures and evapotranspiration, lower average precipitation, and a higher frequency and intensity of droughts, especially in already dry regions.

In 2016, the Greece's Ministry of Environment and Energy developed the national strategy for adaptation to climate change, which features sector-based measures, including:

- Developing a geo-portal for public access to information on climate change impacts on water resources.
- Implementing projects to address these impacts.
- Promoting water saving, efficient use, and reduced groundwater abstraction, especially in water-scarce regions.
- Encouraging land uses and activities that align with available local water resources, including in the CAP Strategic Plan efficient agriculture and even eco-schemes for more drought resistant crops and groundwater recharge.
- Integrating climate change impacts into water planning and management at the River Basin District (RBD) level for future programmes (2022–2027).
- Assessing effects of climate change on hydropower production, considering economic, socio-economic, and environmental factors.
- Providing educational programmes on the impacts of climate change on water resources.

Additionally, Regional Plans for Climate Change Adaptation (RPCCA) were adopted in all 14 RBDs between 2022-2025 to address local climate challenges, with actions including impact assessment, water-saving, wastewater reuse, suitable land uses, integration into management planning, and public awareness.

Electronic data show 10²¹ adaptation measures in 5 RBDs²², such as:

- Measures for drought and water scarcity prevention and management

¹⁷ According to 3rd RBMPs e-reporting (rbmppom_targetedq): Attica RBD (EL06), Eastern Sterea Ellada RBD (EL07), Central Macedonia RBD (EL10), Eastern Macedonia RBD (EL11) and Crete RBD (EL13).

¹⁸ According to 3rd RBMPs e-reporting (rbmppom_targetedq): Western Peloponnese RBD (EL01), Northern Peloponnese RBD (EL02), Eastern Peloponnese RBD (EL03), Western Sterea Ellada RBD (EL04), Epirus RBD (EL05), Thessalia RBD (EL08), Western Macedonia RBD (EL09), Thrace RBD (EL12) and Aegean Islands RBD (EL14).

¹⁹ According to 3rd RBMPs e-reporting (rbmppom_targetedq): Western Peloponnese RBD (EL01), Northern Peloponnese RBD (EL02), Eastern Peloponnese RBD (EL03), Western Sterea Ellada RBD (EL04), Epirus RBD (EL05), Thessalia RBD (EL08), Western Macedonia RBD (EL09), Eastern Macedonia RBD (EL11), Thrace RBD (EL12) and Aegean Islands RBD (EL14).

²⁰ According to 3rd RBMPs e-reporting (rbmppom_targetedq): Attica RBD (EL06), Eastern Sterea Ellada RBD (EL07), Central Macedonia RBD (EL10) and Crete RBD (EL13).

²¹ According to WFD “Key Type Measure 24 - Adaptation to climate change” is related to climate change adaptation measures.

²² According to 3rd RBMPs e-reporting (RBMPPoM_KTM_Measure_basicMeasureType): Northern Peloponnese RBD (EL02), Western Sterea Ellada RBD (EL04), Epirus RBD (EL05), Thessalia RBD (EL08) and Eastern Macedonia RBD (EL11).

- Control and monitoring of artesian wells
- Strengthening environmental education in Primary Education

Finally, 3rd RBMPs include measures for recording extreme droughts, assessing risks, calculating drought indices, proposing alternative water sources and reserves, developing early warning systems, and identifying strategies to prevent and address the impacts of water scarcity and drought on environmental objectives.

However, the latest plans lack forward-looking analyses of future water demand and availability under climate and socio-economic changes²³.

Since 2009-2015, drought management plans have defined indicators for early drought detection to minimise impacts. Measures in the 3rd RBMPs include preparing/updating master water supply plans, repairing water networks, installing borehole extraction recording systems, registering surface water withdrawals by large users, and conducting biannual inspections at licensed abstractions.

Regarding the measures interlinked with the Floods Directive and drought management, Greece had linked a measure in 3 out of the 4 RBMPs reviewed, which look at updating the strategic plan for coping with drought and water scarcity. The measure intends to: (i) include newer rain gauge and meteorological data in the analysis of water scarcity/drought phenomena; (ii) review drought/water scarcity indicators, taking into account the latest measurement data as well as relevant critical infrastructure (e.g. dams or other hydro-morphological alterations); (iii) implement an appropriate monitoring framework for the required indicators; and (iv) define the actions that should be implemented by each body according to its responsibilities in cases of drought.

²³ Greece subsequently stated that, as part of the 3rd RBMPs for all 14 RBDs, an assessment of water availability under both normal and drought conditions was conducted using hydrological data from 1980 to 2020. Advanced modelling tools were employed to estimate the water balances of surface and groundwater bodies, providing a solid foundation for managing abstraction pressures. Forecasts for the next decade have also been developed, incorporating related measures and planned projects aimed at increasing the availability of water resources. These results supported the formulation of measures to address pressures from water abstraction affecting the volume of water bodies. Additionally, the water balance data and models are made available to regional water directorates to assist with water permitting processes and inform future updates of the RBMPs.



4. Policy elements contributing to zero pollution

4.1 Surface Water: what is their chemical status?

Monitoring

Based on its national legislation²⁴ Greece monitors all relevant types of water body in all river basin districts. For example, EL08 Thessalia now includes two monitoring stations at lakes, and a further two coastal monitoring stations. In the 2nd RBMPs, monitoring was mixed, and included 76% of all lakes, 14% of all rivers, 50% of all transitional waters, and 23% of all coastal waters, noting that rivers are the dominant feature making up 80% of all surface water bodies.

A range of frequencies are in use for operational and surveillance monitoring, ranging from every six years, to twice a year. The monitoring covers 42 priority substances, missing three substances of the 45 that are obligatory (hexabromocyclododecane, naphthalene, and dioxins and furans). There is a clear improvement in the number of sites and substances monitored compared to the previous cycle, where monitoring of priority substances varied by RBD. For example, for some river basin districts such as EL08 Thessalia, there was no monitoring in lakes or coastal waters, while in others the number of substances included varied from as low as 1 to a maximum of 36.

Despite the fact that it is obligatory, and given its importance, regrettably Greece did not carry out biota and sediment monitoring in any of the 2nd and 3rd RBMPs. At this stage, only plans are in place to consider targeted monitoring in sediment and/or biota for future RBMPs.

Status assessment – evolution of the chemical status of surface water bodies since the 2nd RBMPs

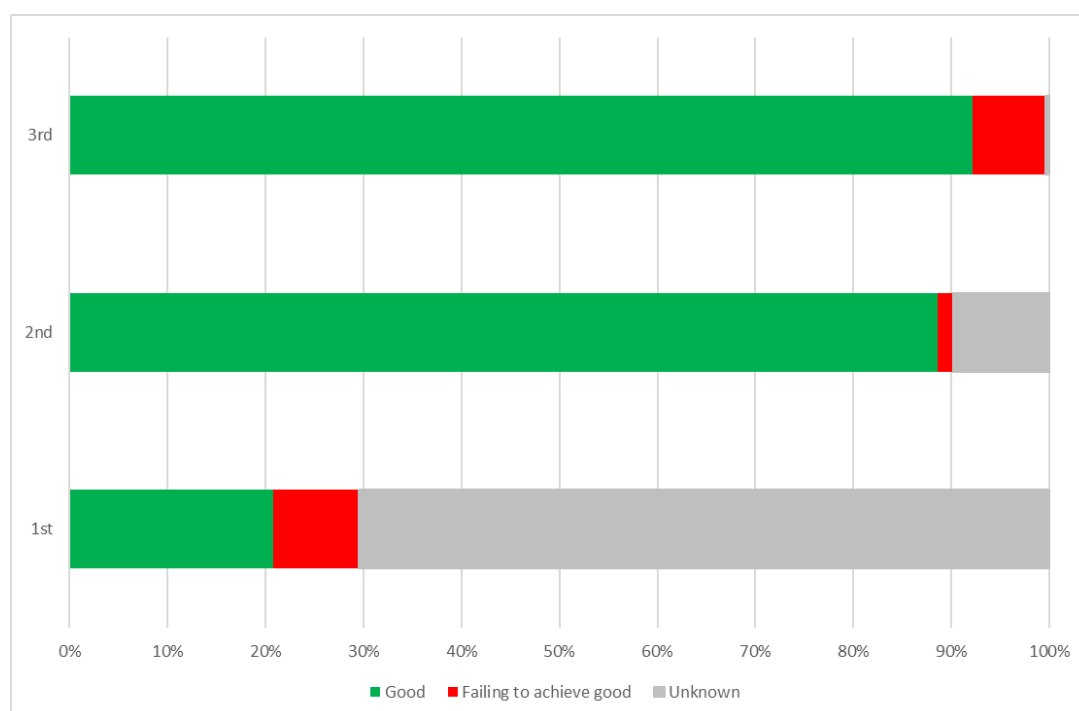
Greece has very significantly improved its classification of water bodies over the last three rounds of reporting, with 'unknown' status falling from 70.5% in the first RBMP to 0.4% in the third. However, unknown status is expected to go back up to 1.2% in 2027 (Figure 8).

The comparison to the 2nd RBMPs shows that as the proportion of water bodies with an unknown status has fallen while the proportion with a good and poor status has increased. However, as of the 3rd RBMP, Greece's electronic reporting indicates that out of the assessed SWBs, 92.2% (1 550 water bodies) have a good chemical status, while 7.4% (124 water bodies) have not achieved a good chemical status.

There will be an increase in the percentage of surface water bodies expected to have a good chemical status by 2027, increasing from 92.2% in the 3rd RBMPs to 96.5% in 2027.

²⁴ Government gazette issue (FEK) 5384/B/19-11-2021.

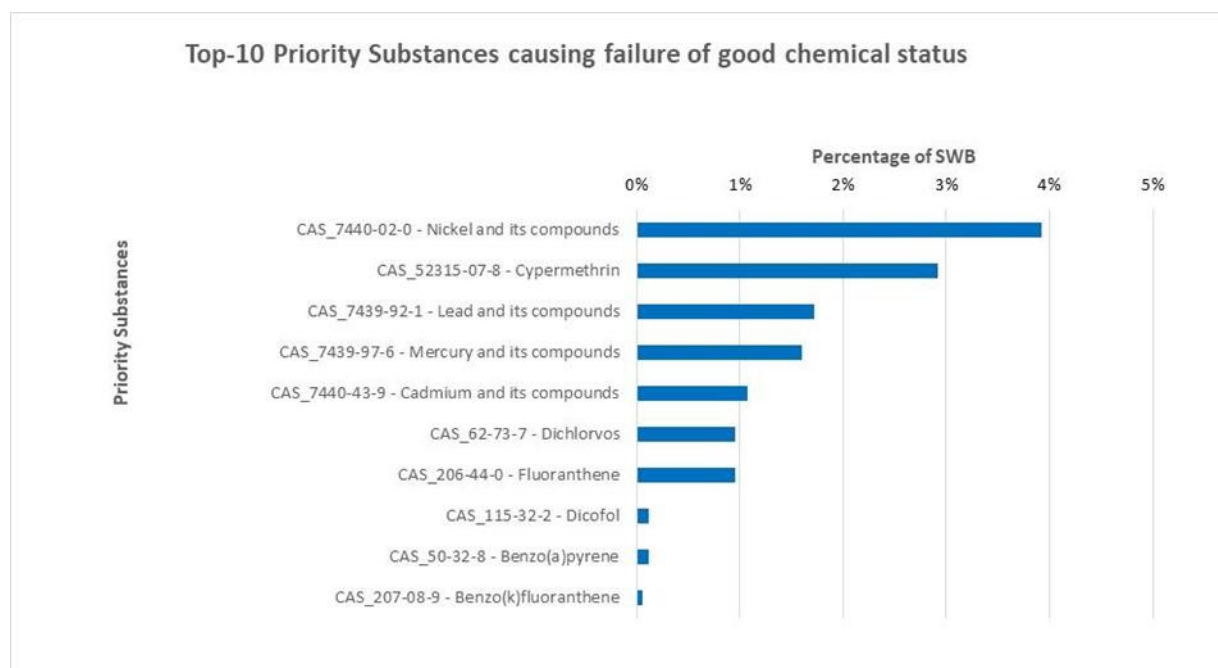
Figure 8. Chemical status of surface water bodies in Greece in the 1st, 2nd, and 3rd RBMPs.



Source: WISE electronic reporting

The reason for the failure to achieve good chemical status is largely due to the presence of metals, with nickel, lead, mercury and cadmium all featuring in the top five substances present. The remaining substances include pesticides, with cypermethrin the second most common substance creating EQS exceedances, and dichlorvos and dicofol featuring in the top ten (Figure 9). The remaining substances are PAHs. Among the top ten, mercury, benzo(a)pyrene, and benzo(k)fluoranthene are ubiquitous, persistent, bioaccumulative and toxic (uPBT) substances.

Figure 9. The top-10 Priority Substances causing failure to achieve good chemical status in surface water bodies in Greece.



Source: WISE electronic reporting



4.2 Groundwater Bodies: what is their chemical status?

Monitoring

Chemical monitoring has seems to have improved compared to the previous cycle, going from 54.3% to 82.5% of groundwater bodies and now encompassing 91.8% of their total area. Surveillance monitoring is conducted on 410 groundwater bodies (69.7%), while for operational monitoring, there has a been a decline from 54.3% to 23% of groundwater bodies monitored. No explanations have been provided, therefore it is difficult to make a trend analysis, (see above), although the overall numbers show a positive trend.

There is no grouping of groundwater bodies in the 3rd RBMPs.

Status assessment

Threshold values for chemical status do not consider impacts on Groundwater Associated Aquatic Ecosystems (GWAAEs) or Groundwater Dependent Terrestrial Ecosystems (GWDTEs) in any of the 14 RBDs according to the latest RBMPs electronic reporting.

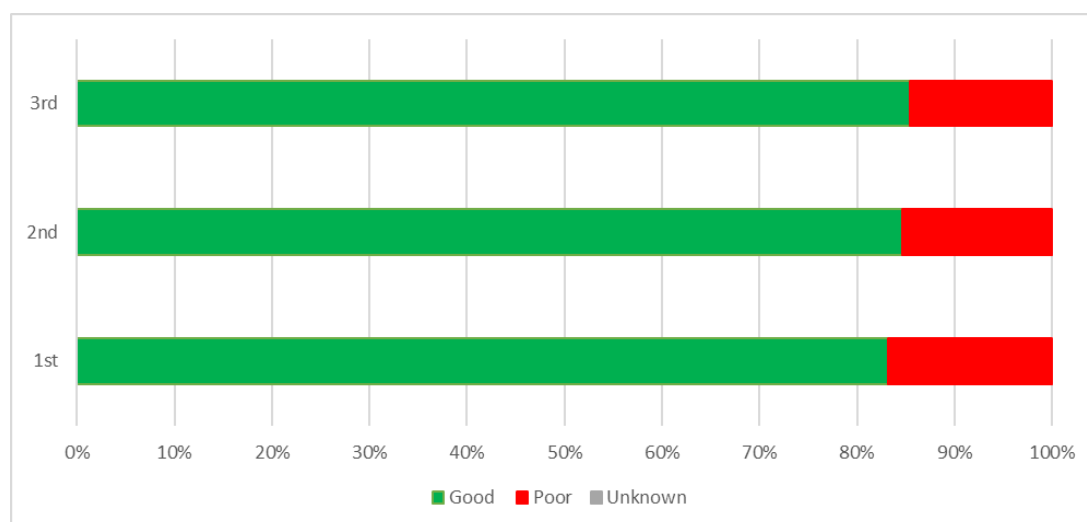
GWAAEs and GWDTEs are considered in the assessments of all the 14 RBDs²⁵ however, according to the 3rd RBMPs e-reporting, 3 out of 14 RBDs do not consider GWAAEs in the groundwater chemical

²⁵ Western Sterea Ellada RBD (EL04), Epirus RBD (EL05) and Thessalia RBD (EL08). Greece has subsequently stated that the GWAAEs are considered in the groundwater chemical status assessment in all RBDs.

status assessment, while GWDTEs are only reported in 8 out of 14 RBDs. Greece has subsequently stated that the GWDTEs are considered in the groundwater chemical status assessment in all RBDs.

Compared to the previous cycle, the situation has not changed. Indeed, 502 groundwater bodies (85.4%) had a good chemical status, and 86 (14.6%) had a poor status, similar to 2015. In a similar manner, Greece does not expect much improvement in the chemical status of groundwater bodies in the coming years. So the status of the bodies seems to have almost stagnated along the different cycles (figure 10).

Figure 10. Chemical status of groundwater bodies in Greece in the 1st, 2nd, and 3rd RBMPs.



Source: WISE electronic reporting

Of the 86 groundwater bodies with a poor chemical status, 60 groundwater bodies (10.2%) failed due to pollution, 56 groundwater bodies (9.5%) from regional saline or other intrusions, and 1 failed due to the declining quality of water for human consumption. The same groundwater body may have multiple causes for status failure. Key pollutants reported include chloride, nitrate, electrical conductivity, sulphate, and ammonium, with many groundwater bodies affected by several substances. Increases in these pollutants result from saline intrusion and agricultural runoff and infiltration.



4.3 What Greece is doing to combat pollution from agriculture

Several measures are linked to KTM2 (Reduction of nutrient pollution from agriculture and KTM3 (Reduction of pesticides pollution from agriculture). For KTM2, there are 42 basic (mandatory) measures, and 10 supplementary measures. For KTM3 there are 18 basic measures and 8 supplementary measures. Looking at the 3rd RBMPs, a number of basic measures support the conversion or maintenance of organic farming. Compared to the previous cycle, some measures are the same and some measures have been carried over since they were not implemented earlier.

The Greek CAP Strategic Plan²⁶ allocates EUR 1.5 billion for environmental and climate objectives such as organic farming, alternative methods of plant protection with a view to reducing pesticides, reinforcing nature protected areas as well as contributing to water savings and improving

²⁶ https://agriculture.ec.europa.eu/document/download/b13e3e86-2c12-45e5-9659-35f0384c76b2_en?filename=csp-at-a-glance-greece_en.pdf

infrastructure. In the CAP Strategic Plan, it is also planned that over 35% of the utilised agricultural area will be covered with commitments to protect water quality between 2023 and 2027²⁷.

The 3rd RBMPs provide information about the cost of measures, the implementing agencies responsible and the source of funding although there were cases where the information has been flagged as indicative or limited. It is noted that no budget is provided for the basic measures of the PoMs therefore, it is not clear if these measures have been properly implemented.²⁸

Regarding gap analysis, Greece has reported selected indicators, such as the number of water bodies at risk of failing to achieve a good status. However, there does not seem to be an estimation of the reduction in the loads of nitrogen and phosphorus needed to achieve the environmental objectives, although nutrient load estimations are provided and attributed to various economic sectors in the RBDs. The agricultural-related nutrient load estimates amount to: (i) 5 612.81 tn/yr of nitrogen and 6 310.23 tn/yr of phosphorous in the more carefully assessed Western Sterea Ellada RBD (EL04); (ii) 1 447.54 tn/yr of nitrogen and 170.45 tn/yr of phosphorous in the Central Macedonia RBD (EL10); (iii) 169.59 tn/yr of nitrogen and 23.19 tn/yr of phosphorous in the Attica RBD (EL06); and (iv) 6 707.2 tn/yr of nitrogen and 1 628.7 of phosphorous in the Crete RBD (EL13). These estimates are not presented at the level of individual water bodies, but at the level of the river basins and RBDs concerned. No estimation of nutrient load reductions of the agricultural measures is reported, so the effectiveness of the PoM cannot be determined.



4.4 What Greece is doing to combat pollution from other sectors

Basic measures to combat pollution from other sectors include those related to urban wastewater collection and treatment and the control of point source discharges. Measures have been mapped to KTM 1 (Construction or upgrades of wastewater treatment plants, 12 basic measures), KTM13 (Drinking water protection measures, 64 basic measures) and KTM15 (Phasing out/Reduction of emissions, discharges and losses of priority hazardous substances/priority substances, 36 basic measures), all of which could have an impact on point source pollution. These include:

- MXXB0701 - Strengthening environmental inspections and controls;
- MXXB0702 – Definition of guidelines and development of tools for the effective control of wastewater and industrial wastewater discharges; and
- In terms of supplementary measures, Greece has reported measures under KTM 1 (4 supplementary measures), KTM4 (Remediation of contaminated sites, 2 supplementary measures), KTM15 (14 supplementary measures), KTM16 (Upgrades and improvements of industrial wastewater treatment plants, 16 supplementary measures), KTM17 (Reduction of sediment from soil erosion and surface run-off, 17 supplementary measures) and KTM21 (Prevention or control of the input of pollution from urban areas, transport and built infrastructure, 14 supplementary measures). Some of these supplementary measures include (where XX is the number of the RBMP):
 - MXXΣ0501- Controls at the outlets of storm drains and other point sources of pollution

²⁷ https://agriculture.ec.europa.eu/document/download/b13e3e86-2c12-45e5-9659-35f0384c76b2_en?filename=csp-at-a-glance-greece_en.pdf

²⁸ Greece subsequently stated that basic measures do not have a dedicated budget, as they are considered minimum compliance requirements. However, in the programme of measure background document, investments have been directed towards implementing the program of measures, with a specific focus on basic measures related to water management, wastewater treatment, and drinking water (improving the efficiency of extraction, treatment, storage, and distribution infrastructure).

- MXXΣ0501 - Controls at the outlets of storm drains and other point sources of pollution which end up in surface water bodies
- M04Σ0503 - Checks on compliance with disposal limits by industrial processing and livestock and poultry farming units within the RBD at least twice a year
- M04Σ0505 - Exploratory monitoring programme of the quality status of groundwater bodies and surface water bodies in areas of existing landfills
- M10Σ0503 - Sampling and analyses of waters inside and outside the port of Thessaloniki
- M10Σ0504 - Masterplan for addressing pollution phenomena in the Gulf of Thessaloniki

Greece has also referred to MXXB0704 – Licensing requirements for new/expansion of existing aquaculture units), however, unlike plans to review existing permits, this is not a measure but a regulatory requirement.

Only one new measure against chemical pollution from other sources than agriculture has been identified for the 3rd RBMPs, which is M04Σ0504 - Design and implementation of a specific programme aimed at monitoring point-source discharges in surface water bodies related to specific pollutants, based on the results of the Pollutant Registry compilation. All other measures are the same as those included in the previous cycle.

There are also specific measures linked to concrete compounds. For example, KTM2 are reported for mercury and its compounds have several KTM2s reported (KTM2, KTM3, KTM8 KTM12, KTM14, KTM15, KTM16 KTM21 and “Other”) (not all of these are relevant just to pollution from other sectors).



4.5 What Greece is doing to combat significant pressures – overall assessment of the Programmes of Measures

Looking at both surface and groundwater bodies:

- Several KTM2s are applied to non-IED plants, including KTM1 (Construction or upgrades of wastewater treatment plants), KTM8 (Water efficiency, technical measures for irrigation, industry, energy and households), KTM13 (Drinking water protection measures), KTM14 (Research, improvement of the knowledge base), KTM15 (Phasing out/reduction of emissions, discharges and losses of priority hazardous substances/priority substances), KTM16 (Upgrades and improvements of industrial wastewater treatment plants), KTM21 (Prevention or control of the input of pollution from urban areas, transport and built infrastructure) and ‘other’ all of which have a gap indicator of ‘other’).
- Several KTM2s are applied to diffuse agricultural, including KTM2 (Reduction of nutrient pollution from agriculture), KTM3 (Reduction of pesticides pollution from agriculture), KTM7 (Improvements in flow regime and/or establishment of ecological flows), KTM8 (Water efficiency, technical measures for irrigation, industry, energy and households), KTM12 (Advisory services for agriculture), KTM13 (Drinking water protection measures), KTM14 (Research, improvement of the knowledge base), KTM15 (Phasing out/reduction of emissions, discharges and losses of priority hazardous substances/priority substances), KTM16 (Upgrades and improvements of industrial wastewater treatment plants), KTM24 (Adaptation to climate change) and ‘other’.
- Several KTM2s are applied to abstractions-agriculture, including KTM2 (Reduction of nutrient pollution from agriculture), KTM3 (Reduction of pesticides pollution from agriculture), KTM5

(Improving longitudinal continuity), KTM6 (Improving the hydromorphological conditions of water bodies other than longitudinal continuity), KTM7 (Improvements in flow regime and/or establishment of ecological flows), KTM8 (Water efficiency, technical measures for irrigation, industry, energy and households), KTM9-11 (Water pricing policy measures for the implementation of the recovery of cost of water services from households, industry and agriculture), KTM12 (Advisory services for agriculture), KTM14 (Research, improvement of the knowledge base), KTM16 (Upgrades and improvements to industrial wastewater treatment plants), KTM17 (Reduction of sediment from soil erosion and surface run-off), KTM20 (Prevention or control of adverse impacts of fishing and other exploitation/removal of animal and plants), KTM24 (Adaptation to climate change) and 'other'.

In total, 883 measures were reported, comprising 503 basic measures and 380 supplementary measures. Key pressures come from several key areas, with non-IED plants, diffuse agricultural pollution and abstractions being the top three pressures affecting surface and groundwater bodies. Greece has performed a gap analysis for all the significant pressures identified.

Greece has carried out a cost-effective analysis for measures, although the methodology for this and the results of its application were not clearly outlined in the RBMPs or their background documents. The Greek authority did, however, state that a cost-effective analysis document was uploaded when the programme of measures was sent out for stakeholder feedback. This was the same for the prioritisation of measures, with limited information uploaded to Eionet, but additional information said to be provided on the Greek portal.

The cost of measures is around EUR 3.7 billion for national funding and EUR 2.9 billion coming from EU funds (for the whole of Greece). The national source of funding for measures is unclear.

It should be noted that clarity in EU reporting is lacking in terms of verifying transparency and the likelihood of implementing the entire PoM.

When it comes to co-ordination with other Directives, Greece has a general group of measures (group 1) which are 'Measures for the implementation of Community and National Legislation for the protection of waters and, in particular, measures required by the following Community Directives', which link to the 'basic measures' in Part A of the WFD Annex VI. For the Floods Directive and the MSFD, Greece highlights the synergies between the RBMPs and the Directives. For example, the Floods Directive integrates flood hazard maps and flood risks maps, which contain information not only on the potential negative consequences of floods, but also on the protected areas under the WFD which could be affected (e.g. in Crete (EL13)). Especially for the MSFD, Greece has combined its measures from the MSFD and the WFD to form a framework for the integrated management and protection of the country's aquatic resources and marine ecosystem.

Greece has mapped relevant measures to tackle significant pressures and specific chemical substances, with measures being linked to KTMs and pressures, and gap indicators being provided.

When designing and implementing research-related measures, Greece should make better and more systematic use of results from EU-funded research and innovation projects. This research can support better action on water management including future water demand as well as climate change impacts, and pollution from substances such as pesticides, pharmaceuticals, PFAS and microplastics.

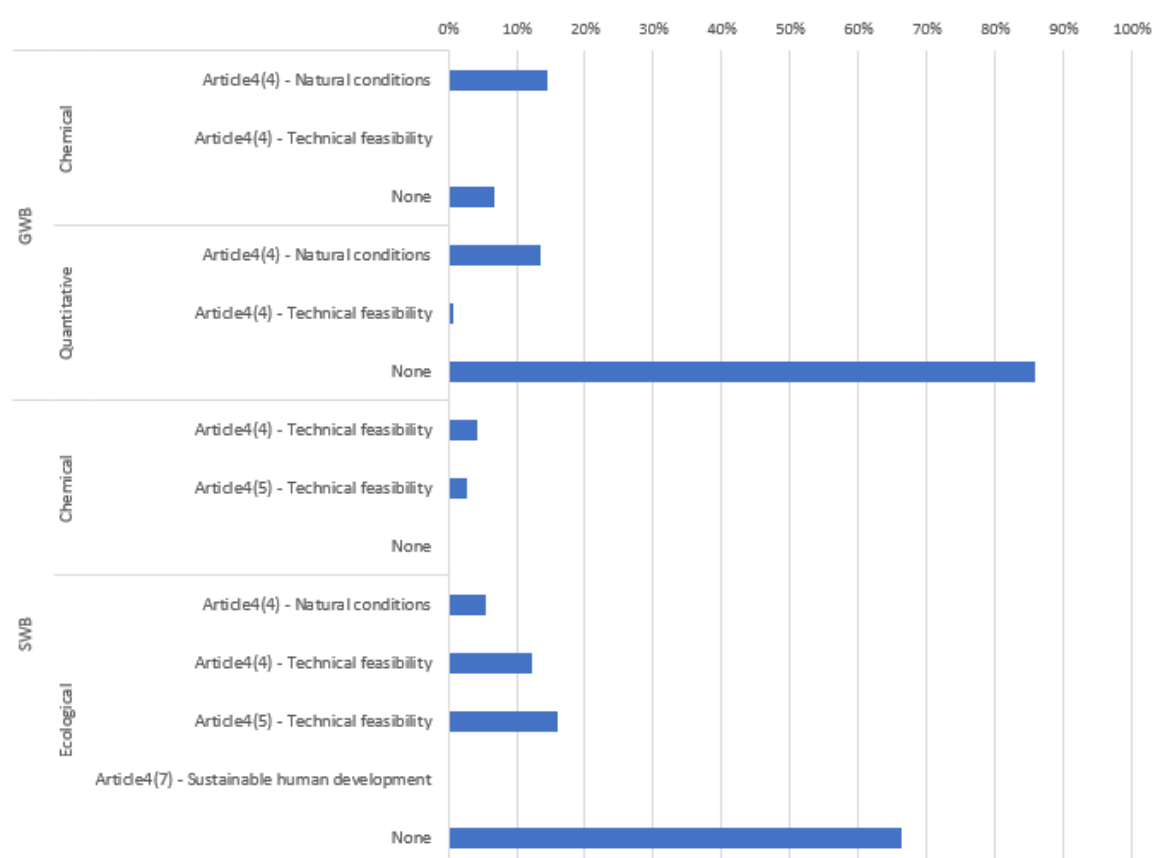
5. Exemptions and economics



5.1 To what extent are exemptions applied in Greece

The WFD allows for some exemptions, but these should be used only where necessary and must be properly justified. As good status has not been achieved in all water bodies, Greece has reported a significant number of exemptions under WFD Articles 4(4), 4(5) and 4(7) in the 3rd RBMPs (Figure 11). Exemptions under WFD Article 4(6) and Article 6(3) of the Groundwater Directive have not been reported.

Figure 11. The use of exemptions according to Art. 4(4), 4(5) and 4(7) WFD in surface water bodies and groundwater bodies in Greece. The bars show the proportion of water bodies for each type of exemption.



Source: WISE electronic reporting

The exemptions according to Article 4(4) in the 3rd RBMPs have been justified on the grounds of technical feasibility and natural conditions as follows:

- Technical feasibility: in 205 surface water bodies (12.2%) for ecological status/potential; in 72 surface water bodies (4.3%) for chemical status; in 4 groundwater bodies (0.7%) for quantitative status, and in 1 groundwater body (0.2%) for chemical status.
- Natural conditions: in 92 surface water bodies (5.5%) for ecological status/potential; in 79 groundwater bodies (13.4%) for quantitative status, and in 86 groundwater bodies (14.6%) for chemical status.

Exemptions under Article 4(4) have been applied in both the 2nd and the 3rd RBMPs. It is noted positively that there has been a reduction in the number of surface and groundwater bodies exempted in comparison to the 2nd RBMPs.

According to the 3rd RBMPs, technical feasibility under Article 4(4) can be invoked due to lack of knowledge of the cause of the degradation; lack of known measures to reduce the existing pressures on the water body; lack of (cost-effective) technology to reduce the existing pressure on the water body; lack of a responsible authority that takes ownership of the degradation; the timeframe for completion of the measure or other delays (e.g. preliminary studies, consultations, administrative processes) extending beyond the current cycle. For natural conditions, the reasons entail the lag time for the restoration of good status for surface water bodies, and environmental response time required to achieve good status for groundwater bodies.

Article 4(5) exemptions have been applied on the basis of infeasibility in 271 surface water bodies (16.1 %) for ecological status / potential and in 48 surface water bodies (2.9 %) for chemical status.

No Article 4(5) exemptions were reported in the 3rd RBMPs.

According to the 3rd RBMPs, *infeasibility* under Article 4(5) can be invoked due to lack of a technical solution; background physical and hydrogeological conditions; unknown cause of degradation, implementation constraints preventing the completion of the measures, and because the cause of the failure is outside the competence or jurisdiction of the country. For *disproportionate costs* (not invoked in the 3rd RBMPs), the reasons entail an unfavourable balance of costs and benefits, and a significant risk of an unfavourable balance of costs and benefits and affordability.

The assessment is carried out, reported and justified per individual water body, including information on the water body category (e.g. river, lake, transitional, coastal, groundwater bodies), river basin code, water body code, water body name, exemption type (e.g. Art. 4(4), 4(5)), characteristics of the exemption status (e.g. ecological, chemical), exemption ground (e.g. technical feasibility), type of pressure and associated driver, associated impact, and justification for the exemption. Justifications are reported for individual water bodies and, in some instances, the same description is applied to more than one water body²⁹ (e.g. for Article 4(4) as regards a time extension).

No exemptions on the grounds of disproportionate costs have been invoked under Article 4(4) or under Article 4(5) in either the 2nd or in the 3rd RBMPs.

A total of 24 water bodies (22 surface water bodies and 2 groundwater bodies) are subject to exemptions under Article 4(7)³⁰. Three exemptions under Article 4(7) have been applied in the 3rd RBMPs (down from 26 surface water bodies and 1 groundwater body in the 2nd RBMPs). Exemptions

²⁹ Greece has subsequently clarified that in both RBMPs and accompanying background documents, the analysis of exemptions is conducted individually for each water body. This detailed analysis covers each water body's specific characteristics, its current status, the major pressures it faces, the resulting impacts, and the measures outlined in the programme to tackle these pressures. Given that the justification for exemptions directly links to the significant pressures on a water body and the measures implemented to address them, as well as the nature of these impacts, it is logical to expect that water bodies with similar characteristics, shared pressures, and comparable impacts would have similar justifications for exemption.

³⁰ According to the 3rd RBMPs e-reporting, one surface water body (0.1%) has been exempted for ecological status under Article 4(7), but Greece subsequently confirmed that a total of 24 water bodies are subject to this exemption. That number includes projects that were assessed in previous RBMPs but as their implementation is still ongoing, the relevant exemption provisions remain in effect.

are briefly justified on the basis of amendments arising from new projects, a timeline for the completion of construction after 2027, possible groundwater degradation due to mining activities and flooding, the interruption of natural continuity, and reduction of runoff or regulation of flow. The RBMPs state that the methodology developed by the General Directorate of Waters of the Ministry of Environment and Energy during the 1st RBMPs, and amended during the 2nd RBMPs, assists planners in applying exemptions under Article 4(7).

No exemptions under Article 4(6) have been applied in the 3rd RBMPs.

No exemptions under Article 6(3) of the Groundwater Directive have been indicated as part of the electronic reporting.



5.2 Use of economic analysis and water pricing – cost recovery

The 3rd RBMPs' dedicated section dedicated to an economic analysis is incomplete and does not specify what has been improved since the last cycle. The 3rd RBMPs identify three primary water services: domestic water supply, sewage and wastewater treatment (both provided by water companies), and water supply for agricultural irrigation. Apart from these three broad water services, the economic analysis does not include individual water services such as water storage and water reuse. It discusses self-abstraction, but by ministerial decree, and explicitly excludes abstraction for the purpose of hydropower generation from the economic analysis. The 3rd RBMPs identify domestic use, industrial processes, agriculture, and 'other/residual' as distinct water user sectors.

The economic analysis is based on water consumption data by water user sectors and associated costs and revenues in order to calculate the recovery rates of financial costs. Regrettably, however, other items required have not been reported, notably long-term forecasts of future water supply and demand (beyond historical data) and future investments, and an analysis of the cost-effectiveness of the programme of measures. No clear information is available regarding the integration of long-term climate change adaptation scenarios into the economic analysis. This limits the ability to assess future resilience and planning needs³¹, such as investments to increase water efficiency complemented with investments in (additional) water recycling and desalination capacity.

On water pricing, the 3rd RBMPs provide a limited and incomplete account of the water pricing framework and regulation in Greece, and fails to conclude as to whether the pricing policies provide adequate incentives for more efficient water use. The information available in the RBMPs and from two large water companies suggest that the two-part tariff structure, with unit rates that increase over consecutive volume brackets, provides clear incentives, particularly to households. However, the disparity between the tariffs for households and those for other sectors (e.g. lower rates for industry and agriculture), compounded by the current lack of metering of water use, suggests there may be an untapped potential to provide more price incentives, as well as more equal cost recovery efforts for different water users.

Recovery rates of financial costs are reported at RBD level, calculated for water services overall and, often, also for domestic water supply, wastewater treatment, agricultural irrigation and industrial use. However, the reporting on methodology and calculation lacks transparency. For instance, only a

³¹ Greece has subsequently pointed out that the background document P3.3 (water supply and demand balance) includes the use of a water management model to test future scenarios for economic activities and hydrological conditions, supporting the selection of optimal environmental and economic outcomes. However, these scenarios are not explicitly presented or assessed within the RBMP pdf documents.

subsequent explanation by Greece has clarified that the recovery rates do not take on board the portion of costs covered by subsidies or grants received by the water service providers.

The 3rd RBMPs recognise that water service costs are often not fully recovered, but they do not provide clear justifications as to why is that so, namely the cost recovery mitigation factors (as listed in WFD article 9(1)) or the use of the 'established practices' exemption (WFD Article 9(4)). Furthermore, despite the 'sectorial recovery rates,' the 3rd RBMPs lack an account as to whether the various water user sectors provide an adequate contribution to recover the costs of water services.

The 3rd RBMPs do not present any broader cost recovery assessment that includes environmental and resource costs. Following a national methodology, the environmental and resource costs (ERC) are estimated on the basis of the cost of supplementary measures needed to achieve good status for surface water bodies and good chemical status for groundwater bodies, while the resource costs estimates reflect the cost of reversing over-abstraction, particularly in groundwater bodies with poor quantitative status. These costs are assessed across all main water services. The reports specify that ERCs are allocated to water user sectors based on their share in the cost of the supplementary measures. However, the RBMPs do not clearly explain whether or how the ERCs produced have informed water tariffs³² and they do not demonstrate that actual polluters are being charged in proportion to the environmental damage they cause. Consequently, the RBMP documents do not provide corroboration for the statement that the polluter pays principle has been applied.

³² Greece has subsequently clarified that in 2022, the Council of State, the highest administrative court in the country, annulled the 2017 measure regulating ERC recovery, and that a reintroduction of an ERC component in the tariffs is under consideration.



6. WFD recommendations

To address its persistent water management challenges, including over-abstraction, diffuse agricultural pollution, inadequate monitoring, hydromorphological pressures, weak governance and institutional fragmentation, incomplete economic analysis, and growing water scarcity exacerbated by climate change, Greece should:

1. Reduce the compliance gap as much as possible by 2027. This implies:

- a. A leaner and more coherent governance structure with clear responsibilities, improved administrative capacity and coordination.
- b. Ensuring timely compliance with WFD procedural requirements: Greece did not consult, adopt, and report its 3rd RBMPs in accordance with WFD timetable obligations. Greece must ensure that future planning cycles comply fully with WFD deadlines, including strategic environmental assessments for all RBDs.
- c. Strengthening transboundary cooperation by developing International River Basin Management Plans for shared RBDs with Albania, Bulgaria, North Macedonia, Serbia, and Türkiye. Cooperation should cover joint monitoring, status characterisation, shared measures, and water quantity issues including abstraction and scarcity, especially for the Axios, Strymon, Nestos, Evros, and Prespa waters. None of the international RBDs currently has an IRBMP.

2. Identify and put in place additional measures to tackle persistent environmental pressures preventing the achievement of a good status, on the basis of robust gap analyses. This implies, among other things:

- a. Stepping up action to reduce agricultural diffuse pollution, on surface water bodies (14%) and on groundwater (12% diffuse pollution). Greece should quantify the required reductions in nitrogen and phosphorus loads at the level of individual water bodies, assess effectiveness of existing measures, and implement binding additional measures where voluntary approaches prove insufficient. Synergies with the CAP strategic plan, the Nitrates Directive, and the Marine Strategy Framework Directive should be actively pursued.
- b. Addressing point source pollution from non-IED plants, the single most significant pressure on Greek surface water bodies (24%). Greece should ensure that permits for wastewater treatment plants and other discharging installations are reviewed and, where necessary, updated before the end of the third RBMP cycle. Only one new chemical pollution measure was identified for the 3rd RBMPs, which is insufficient given the scale of this pressure.
- c. Tackling chemical pollution more effectively, in particular from metals (nickel, lead, mercury, cadmium) and pesticides (cypermethrin, dichlorvos, dicofol) which dominate the causes of failure to achieve good chemical status in surface water bodies. Greece should identify the sources of these substances at the level of individual water bodies,

implement mandatory reduction measures, and initiate monitoring in biota and sediment — absent in both the 2nd and 3rd RBMPs — without further delay.

- d. Addressing hydromorphological pressures more systematically. Physical alteration of channel/bed/riparian area and dams, barriers and locks are among the most frequent hydromorphological pressures in Greece. Measures under KTMS focus mainly on achieving Good Ecological Potential for Heavily Modified Water Bodies (HMWBs) rather than restoring continuity in natural water bodies. Greece should develop specific measures for non-HMWB water bodies subject to hydromorphological pressures, promote nature-based solutions, and enhance ecological restoration.
- e. Urgently addressing water scarcity and over-abstraction. The number of surface water bodies failing to achieve good ecological status due to abstraction has more than doubled between cycles (from 2.4% to 6.1%). The Seasonal Water Exploitation Index+ reaches near-critical levels in Crete (99% in August) and Eastern Macedonia (76% in September). Agricultural metering, mandatory by the end of 2026, must be fully enforced. Wastewater reuse must be significantly expanded. Long-term water supply and demand scenarios should be developed and integrated into the next RBMPs, drawing on the national water strategy adopted in July 2026 by the Council of Ministers and published in the Government Gazette on 6 August 2026..
- f. Ensuring that ecological flows are fully defined and implemented across all relevant water bodies in all 14 RBDs. Ecological flows are currently fully defined in only 5 RBDs and partially in 9 others. The definition of available groundwater resource must explicitly consider the needs of groundwater-dependent terrestrial ecosystems in all RBDs, including Western Macedonia, Eastern Macedonia, Thrace, Crete, and the Aegean Islands, where this is currently not done despite a legal requirement to do so.
- g. Putting in place additional measures for protected areas, including Natura 2000 sites, for which Greece has set additional objectives but has not yet included corresponding measures in its Programmes of Measures. Conservation objectives for Natura 2000 sites have not yet been legally formalised. These omissions should be remedied before the end of the current RBMP cycle.

3. Where exemptions are invoked because objectives cannot be met, they should be applied in line with the restrictive interpretation of Article 4 of the WFD, with detailed justification at the level of each individual water body, and their application should be regularly reviewed. This implies, for Greece:

- a. Invoking Article 4(5) (less stringent objectives) only where the conditions set by the WFD are strictly met. Greece has applied Article 4(5) to 16.1% of surface water bodies on grounds of infeasibility — one of the highest rates in the EU. No Article 4(5) exemptions on grounds of disproportionate costs have been used; Greece should assess whether this is consistent with actual ground-level conditions and, where disproportionate costs are a genuine factor, provide transparent, methodology-based justification.

- b. Providing more detailed justifications for Article 4(7) exemptions related to new projects including hydropower, mining, and flood infrastructure, , by detailing cumulative effects, the assessment of better environmental options, and the specific mitigation measures taken. Greece should also define clear and transparent thresholds for significant adverse effects in the designation of Heavily Modified Water Bodies and Artificial Water Bodies.

4. As regards economic analysis, water pricing and cost recovery, Greece should:

- a. Substantially improve the economic analysis in future RBMPs, including long-term forecasts of water supply and demand under different climate and socio-economic scenarios, the projections of investment needs beyond 2027, and a transparent cost-effectiveness analysis of the Programmes of Measures. The current economic analysis of the 3rd RBMPs is incomplete and does not meet the requirements set out in Annex III of the WFD. The economic analysis must cover all relevant water services, including hydropower abstraction, currently excluded by ministerial decree.
- b. Review the application of the polluter pays principle and water pricing policies to ensure that water user sectors make an adequate contribution to cost recovery. Current pricing provides stronger incentives to households than to industry or agriculture. The disparity between household and agricultural/industrial tariffs, compounded by the lack of agricultural metering until 2026, should be addressed. Greece should clarify the cost recovery mitigation factors under WFD Article 9(1) or, where the established practices exemption under Article 9(4) is applied, provide transparent justification.
- c. Demonstrate how environmental and resource costs have been factored into water tariffs and show that actual polluters are charged in proportion to the environmental damage they cause. The methodology for calculating financial cost recovery rates, notably the exclusion of subsidy and grant income from cost calculations, should be clearly disclosed in the RBMPs and not left to subsequent clarification.

5. As regards monitoring, assessment, data management and reporting, Greece should:

- a. Significantly strengthen monitoring coverage, which remains broadly incomplete across key water body types and quality elements. Phytoplankton in rivers and phytobenthos in lakes are not monitored at all. The hydrological regime is not monitored in rivers and transitional waters. Thermal conditions, salinity, and acidification status are monitored at fewer than 1% of river sites. Coastal waters have no monitoring for river basin specific pollutants. These gaps must be closed to enable reliable status classification and trend analysis over successive planning cycles.
- b. Initiate monitoring of priority substances in biota and sediment without further delay, as this monitoring was absent in both the 2nd and 3rd RBMPs, despite being obligatory. Greece should also monitor the three priority substances currently excluded from programmes (hexabromocyclododecane, naphthalene, and dioxins and furans), unless a properly risk-based and documented justification for their exclusion can be provided.

- c. Address the persistent low level of confidence in status classifications, which affects nearly all water bodies, most acutely those classified as having a good or high ecological status. A high number of classifications do not use hydromorphological or physico-chemical quality elements. Gaps in monitoring gaps must be closed, and expert judgement or grouping methods better documented when used as a substitute for monitoring.
- d. Improve the transparency of data reporting by making open-access data on monitoring results, economic analyses, measure implementation, and gap indicators publicly available through official EU reporting channels. Analyses of cost-effectiveness and methodologies to prioritise measures, said to be currently available on the Greek portal but not reported to EIONET, must be formally reported. Funding sources for basic measures should be clearly identified; their absence makes it impossible to verify the proper implementation of the Programmes of Measures.

6. Integrate climate resilience more systematically into water planning. This implies:

- a. Including forward-looking analyses of future water demand and availability under different climate and socio-economic scenarios in the next RBMPs. The 3rd RBMPs lack this dimension entirely, limiting the ability to identify future bottlenecks, plan investment in water efficiency, recycling, and desalination, and assess the sustainability of the current abstraction trajectory in water-stressed regions such as Crete, Central Macedonia and the Aegean Islands.
- b. Strengthening coordination between WFD River Basin Management Plans and Floods Directive Flood Risk Management Plans. The consultation and planning phases of the 2nd FRMPs and 3rd RBMPs were not coordinated, and the Programmes of Measures lack explicit references to objectives of the Floods Directive. Future planning cycles must be fully synchronised, flood risk measures assessed against WFD objectives, and WFD-protected areas reflected in flood hazard and risk maps.
- c. Strengthening coordination between the WFD and the Marine Strategy Framework Directive through a source-to-sea approach, ensuring aligned monitoring and assessment methods, and integrated planning of measures addressing land-sea pollution pathways. This coordination, already initiated in the 3rd RBMPs, should be further formalised and reflected in the Programmes of Measures.

SECTION B:

FLOODS DIRECTIVE

Greece has failed to comply with its legal obligation and has not reported the 2nd FRMPs by the time this assessment has been prepared.