An overview for the national Expert Meeting, Brussels, 07.11.2011
Greece has transposed ELD, by the 148/2009 Presidential Degree, adopting the full scope of the Directive.
A mandatory security system has been selected as a more suitable instrument for the national market.

Gradual transition from a voluntary to a mandatory financial security system, regarding the activities covered by Annex III, starting from the 1st of May 2010 until the end of 2012.

By law 4014/2011 (for environmental licensing): «until the end of 2012, operators of the activities included in Annex III should gradually adopt a financial security scheme».

Next year a commun decision has to be prepared and approved to implement all necessary financial measures & criteria.
Ministry / Special Secretariat of Environment and Energy Inspectorate
Coordination Office for the Remediation of Environmental Damage
SYGAPEZ

supported by a:

National Advisory Committee on Environmental Damage (EAPZ)
recruited by competent authorities and stakeholders (industry, academic, etc.).

The composition may change in special occasions when environmental damage incidents should be dealt by special advisors and experts.

Competent Authority in National level:
Regional Advisory Committees on Environmental Damage PEAPZ

The members of this Committee are civil servants mainly from Environment, Water, Public Works and other relevant Units of the 7 Decentralized Administrations.

The Committee may be also supported by experts on special occasions.

SYGAPEZ is developing guidelines and a network for direct collaboration and exchange of information to support PEAPZ actions for all cases where environmental responsibility is implemented by PEAPZ.
Hellenic Environmental Inspectorate:

It has the competency to evaluate the requests submitted by citizens and NGOs for the implementation of environmental responsibility.

Close collaboration between SYGAPEZ and the Hellenic Environmental Inspectorate is necessary.

Subjects to environmental responsibility regime

A number of cases (about 25) have been activated at national and regional level.
The damage mostly occurred, regards pollution caused by uncontrolled and illegal waste disposal.

In many of these cases, operator is unknown and the state should provide for remediation.

This is a highly important issue but very difficult to tackle in the framework of economic crisis.

Technical specifications for the steps and measures taken are adopted, establishing a common approach at a national and regional level, according to the speed that damage is expanded, the type of damage, the resources affected, the activity caused the damage as well as other parameters.
Industrial diffused pollution caused serious environmental damage for surface and underground water, soil and biodiversity resources.

**Case study: «The Assopos River Tragedy»**

Allocation of recovery costs: implementation of an “objective and operational” system for the allocation of remediation.

Cost evaluation of the damage remediation and allocation to the operators. Elaboration of a preliminary studies on the extension and the characteristics of environmental damage to propose specific remediation measures (funded by National Strategic Reference Framework).

Type of damage
Asopos river basin covers a total surface area of 450 km² and extends to Evoikos Gulf.

Seven Municipalities, a population of some 200,000 inhabitants, are located in the broad Asopos area, which is the largest industrial region of Greece, but not officially recognizing as legitimize industrial zone, supporting 1500 Industrial facilities: Metal plating, agrochemical, and food/beverage industries among others.

Since 1979, the river is characterizing by the Regional Authorities (Prefectures of Attica and Viotia) as receiver of industrial treated sewage.
**Point pollution** involves pollution from a single concentrated source that can be identified, such as an outfall pipe from a factory or refinery.

**Nonpoint pollution** involves pollution from dispersed sources that cannot be precisely identified, such as runoff from agricultural or mining operations or seepage from septic tanks or sewage drain fields.
Environmental inspections

The Hellenic Environmental Inspectorate has conducted more than 300 environmental inspections at the broader Asopos area’s, 107 activities, imposing a total amount of 4.100.000 Euros penalties for failing to comply with their permits environmental terms and 150 activities for no taking prevention or/and remediation measures.
Lagoon

Environmental inspections
Administrative and other measures:

- Providing safe drinking water
- Adoption of strict emission standards to industrial effluents
- Mandatory renewal of environmental licenses of the industries dispose their wastewater in Asopos River
- Industrial region spacial and urban planning
- Industries inspections and administration penalties to the operators not complying to environmental legislation in the area of Asopos Basin

Case study: «The Assopos River Tragedy»
An Integrated Program, for environmental crisis management.
Protection of Human Health,
Provision of Safe Drinking Water:
a fundamental citizens’ right.

The clean-up cost of the polluted groundwater must be allocated to the polluters, as imposed by the “polluter pays principle”.

The health effects must be evaluated through epidemiological studies.

There must be integrated quality control of food products/crops from the contaminated sites.
Clean Production & Industrial Pollution Integrated Control

The environmental licenses of all industries shall have incorporated, until the end of 2010, new terms and conditions so as to comply with existing EU and Greek legislation, regarding Management of Hazardous Waste and Protection of Groundwater.

Every industry has to promote a review of its environmental licenses’ and permits’ conditions using clean, innovative environmental technologies, and then to implement these new terms until the end of second semester 2011.

Ministry has to ensure compliance as well as pollution prevention control.

An Integrated Program, to manage environmental crisis.
Remediation plan of the contaminated sites

Such a remediation plan will be based on site’s proper characteristics, including geographical information, mapping of the contamination plumes, of the polluted surface, of the extend of pollution, polluted sites, etc, of the total evaluation of the pollutants types and of the respective migration rates in groundwater.
January 2011
An International Experts WORKSHOP
on HEXAVALENT CHROMIUM
IN DRINKING WATER
Bilateral collaboration to promote ELD goals

Actions and events to inform and sensitize bankers, insurers, risk managers and other relevant actors

One year of debate between the Ministry, the Hellenic Bank Association & the Insurance Companies Association

1st Stakeholders WORKSHOP in Athens, May 2010

Activities (polluter)

Public Administration

Directive 2008/99/EE

Local Society

European Union

Banks

Environment

Insurers

Media
- Bring participants up to speed regarding the environmental and social risks involved in lending and investing projects as a consequence of the activities of their clients.

- Guide participants through strategies and tools to detect, evaluate and mitigate these environmental and social risks.

- Explore next steps in terms of promoting the efficient implementation of E&S risk analysis in the Greek financial sector.

**OBJECTIVES**
The industrial sector, amid a prolonged economic crisis, considers the introduction of an obligatory insurance regime as a threat, since it would mean for them an additional economic burden.

The insurance sector is already a step forward:

The legislation regarding the management of hazardous waste, provides that installations that treat, handle or transfer hazardous waste are obliged to be insured against any environmental damage that could be potentially occurred and to restore the environment in its baseline condition.

At least 3 insurance companies have already introduced in the market relevant products, which are actually environmental liability insurance policies.

Main conclusions
The insurance sector as a whole, considers the environmental liability insurance market as a growing and particularly interesting economic field.

Nevertheless, a drift towards a potential obligatory scheme is considered by them both as an opportunity and as a threat at the same time.

This new market is, actually unexplored, with insufficient data regarding crucial parameters (number of incidents per number of total policies, minimum, maximum and average amount of costs of environmental damage incidents, etc.).
An obligatory scheme would lead to a large number of policies, thus maximizing uncertainties.

The banking sector gradually understanding the significance of the issue, has nevertheless not developed any relevant products until today, asking to understand the potential risk of funding projects with potentially high environmental impact and the fact that obligatory insurance could be an answer to this problem.

Main conclusions
Last year’s efforts gave a positive assessment of the ELD-related Hellenic insurance market and generally described it as a growing and competitive market, providing good cover for most liabilities under the Directive.

**Further growth of the market is hindered by the lack of interest from operators in this type of product rather than high premiums or the uninsurability of certain liabilities.**
The biggest problem may be the underdeveloped awareness by operators of their ELD liabilities and the available financial security products and markets.

Therefore, awareness raising, with operators but also with brokers, and improving communication between operators, insurance companies and competent authorities are the challenges and the main tasks to be taken up in the near future to improve ELD implementation.
The most important action will be the development of quite clear guidances on the most important challenges and problems, such as:

- economic evaluation of damage,
- remediation methods and techniques, in particular regarding complementary remediation and compensatory remediation.
A new market

The insurance market is moving.

There are a lot of specific products even in the Greek market already and some companies even provide cover for businesses carrying out operations in more than one country.

The insurance market has developed several products to help businesses meet their ELD obligations.
A new market

New demands

Damage caused by an accident (accidental pollution)

Gradual damage
New procedures to «secure» environmental licences …

More credible ISO & EMAS procedures … more liabilities …
Thank you for your attention.