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ΕΝΕΡΓΕΙΑΣ &
ΚΛΙΜΑΤΙΚΗΣ
ΑΛΛΑΓΗΣ

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Comments of the Ministry of Environment, Energy and Climate Change on the Waste Management Roadmap for Greece proposed by DG ENV

The proposed Roadmap gives Greece an essential framework of actions in order to set the waste management priorities, to enable implementation of EU waste legislation and to plan resource-efficient waste management actions. It also builds on steps already taken by the Ministry of Environment in this direction.

Paramount to this framework is the design of a set of integrated actions that will allow first of all the elimination of illegal waste practices, to gradually move away from the reliance on landfilling municipal waste and to establish a reliable and effective governance system of waste management. That will allow for a good use of any economic instruments that may be introduced by law or by regulation.

The main recommendations are considered relevant, proportionate and to a certain degree they have already been introduced in the Greek legislative and regulatory framework and in relevant action plans.

Specific measures and actions foreseen in the roadmap are already in place or in progress; the national waste management plan is being revised, the national waste prevention plan is being prepared, the institutional framework of the Regional Waste Management Agencies (RWMAs) is being optimised. Specific measures have been taken to reduce waste disposal through the promotion of pre-treatment and recycling; in many cases they were complemented by rehabilitation of uncontrolled landfills, introduction of a landfill tax, development of a biowaste strategy etc.

However, the EU report should take into account certain facts and clarifications that we consider important since they can have a strong impact on the implementation of any plans:

1. The economic environment

Greece has been experiencing very adverse and unstable economic and social conditions in the recent years and needs to develop and implement policies that will help growth and development, in parallel with meeting legal obligations. The current conditions have severely worsened since the beginning of the economic crisis. The delay in the implementation of waste management plans accumulated during the period when time and money were available has turned into a serious challenge now that time and available resources are severely limited.

The austerity measures and the need to restrain public spending combined with the necessary reforms in the structure of the public administration and restrictions on recruitment have led to significant downsizing of crucial public services, with no imminent potential of employing new personnel. This applies to a large extent also to the local administration, who is the key

actor in waste management. Local authorities are obliged, with very limited resources, to finally stand up to the occasion and adopt more advanced waste management schemes that actually require strong investments in terms of economic and human resources.

2. The island character of Greece

The smaller municipalities and especially the island communities will probably be more affected by this sudden awakening, from a near zero cost for waste management to a more operationally demanding and therefore costly management system.

The island character of Greece, unique at the European level, which multiplies the needs and infrastructure costs, should not be ignored. Notwithstanding the cost, the special characteristics of the island communities cannot be assessed with the same criteria as towns and cities of the mainland, where transportation is continuous irrespective of seasons, and where space is more easily available for setting service facilities.

An integrated waste management policy for the island areas is necessary. Relevant pilot programs are already ongoing in several small islands.

3. Institutional reform

Up to now, the Regions (the State at regional level) were responsible for the Regional Waste Management Plans and the Regional Waste Management Agencies, which represented the local, elected, administration, were responsible for the implementation. Since «Kallikratis» and Law 4042/2012, planning and implementation lie within the responsibility of the Regional Waste Management Agencies (RWMAs) organized at regional levels. Regional authorities are no longer State, but elected local administration. They are no longer directly involved in waste management. The idea behind this reform is that the one in charge of implementation should be directly involved in the planning process and vice versa. Individual municipalities are only directly involved in the collection systems.

The decentralization was a central political choice, in line with the application of the “proximity” principle, fundamental to the EU waste management policies. The necessary transition phase of the «Kallikratis» reform in the waste management structures means that we still do not have the key actors in place, except in few cases. This fact makes the division of tasks and the funding of the actions more complicated. It is therefore of outmost priority to clarify and regulate in an effective manner the waste management governance system, in order to finalize tasks, design and implement economic instruments for the operation of sustainable and resource-efficient waste management systems.

Finally, in the effort to utilize the proposed roadmap, Greece welcomes technical support and know-how from the European Commission. Greece has already asked for technical support from TFGR and will try to increase its participation in all relevant fora.

The fact that the preparation of both the new national waste management plan and the national waste prevention programme are underway represents a very good opportunity to take on board the proposed recommendations to the extent and in the form best suitable to Greek local needs. The recommendations will also be forwarded to the waste management authorities in order to update accordingly the regional waste management plans, as applicable to the local characteristics.