

**To:**

Mr. Frans Timmermans, Executive Vice-President, European Commission

Mr. Margaritis SCHINAS, Vice-President, Commissioner for Promoting our European Way of Life, European Commission

Mr. Virginijus SINKEVIČIUS, Commissioner for Environment, Oceans and Fisheries, European Commission

Mrs. Kadri Simson, Commissioner for Energy, European Commission

Mrs. Ilze Juhansone, Secretary General, European Commission

Dear Executive Vice-President,

Dear Vice-President,

Dear Commissioners,

Dear Secretary General,

We, the Ecologists Greens party of Greece, member of the European Green Party, are addressing this letter to you because we would like to share with you our concerns about the preparation and implementation of the energy transition process in Greece.

We would like to draw your attention to the recent legislative proposal presented for online [public consultation](#) by the Greek Government (Ministry of Energy and Environment) on 6 July 2022. The time allowed for this consultation is only seven (7) days, which is not in line with a transparent and democratic approach, that you, the representatives of the European Commission, are always advocating when you are discussing with us the prerequisites for a successful implementation of the necessary European energy transition process to reach the climate and energy goals by 2050.

We are in full agreement with you that this transition has to be based on a transparent consultation, which give the EU citizens the possibility to not only participate in the transition process, but to lead it; quoting Executive Vice-President Timmermans: “There is no transition without the people.”. Therefore, we would like to draw your attention to the situation in Greece, where we are currently observing that the participation of the people is not guaranteed. Hence, **we urge you to contact the Greek Government immediately and to remind them that sound participation of the population is necessary for this and all consultation processes to have the desired effects of citizen participation and smooth implementation. As this is not the case with the current consultation process, it has to be prolonged at least till the end of September 2022.**

**Why are we sounding the alarm?**

The proposed law has diverse and critical parts related to environmental licensing, protected areas, development of offshore wind farms and circular economy. These proposals are related to other complex subjects, such as regional planning, ecological and economic systems, so the corresponding stakeholders have to be:

- a) fully informed;
- b) invited to participate in the consultation;
- c) given sufficient time to study the proposed law and submit their comments; and
- d) taken seriously by the Government in terms of the suggestions they make.

In this context more information must be prepared and distributed to clarify the implications of the proposal. So far, the Greek Ministry for Energy and Environment has invited interested groups to participate in the consultation process via the platform <http://www.opengov.gr/minenv/?p=12390> with a deadline of 13 July 2022. This means: the consultation process is only open for one week! On that background we are worried that the Government will forward its draft for the new law with extremely short procedures to the Parliament. This might already happen till 22 July 2022! – before the Parliament closes for the summer.

Fast-track procedures like this – which are not happening for the first time in Greece – will contradict the aim of Europe to make the energy transition a “just transition” for the people. If people are not integrated into this game-changing processes, they will oppose it, and this will cause considerable societal problems in the future. In this light, we are strongly advocating that consultation processes should be at the center of the energy transition processes that are happening all over Europe and we want to make sure that they are happening in Greece too.

#### **What has happened already?**

So far 11 Greek NGOs have already addressed a letter to the Greek Minister for Energy and Environment with the request that the consultation be extended substantially. Please see the attached Annex to this letter. We will also inform the members of the European Parliament of our case in Greece.

Dear members of the European Commission, we kindly ask you to support our cause, because it is urgent, and it is crucial for engaging the European population in this important transition to renewable energy that we fully support.

We remain at your disposal for any clarification. We look forward to your swift action to ensure that people remain at the heart of policy-making in the EU.

Kind regards,

Dominikos K. Chrysidis

**International Secretary**

**Ecologists Greens (Oikolgoi Prasinoi)**

**Annex: Translation of the letter, sent by 11 NGOs to the Ministry of Energy and Environment:  
Written demand by 11 NGOs for extension of the consultation period**

To: Mr. Kostas Skrekas, Minister of Environment & Energy

08 July 2022

Subject: Request for an extension of the consultation on the draft law on environmental licensing, protected areas, development of offshore wind farms and circular economy

Dear Minister,

On July 6, 2022, you put in public electronic consultation the draft law entitled "Provisions for the simplification of environmental licensing, environmental inspections and environmental protection, urgent forestry, spatial planning and urban planning provisions, establishing a framework for the development of Offshore Wind Farms, dealing with the energy crisis and circular economy issues" on the consultation website <http://www.opengov.gr/minenv/?p=12390>, with a deadline for submitting comments on July 13.

This extensive draft law of 11 sub-chapters and 97 articles concerns cutting-edge issues of environmental policies regarding environmental licensing and environmental controls, protected areas, OFYPEKA and the Green Fund, forests and the fire season, spatial planning and urban planning, the offshore wind farms, the energy crisis and the circular economy in our country. The proposed changes to the current legal framework are multidimensional and cover a wide range of issues. The environmental dimensions of these changes are extremely important, while at the same time the prospects of economic development and social welfare in our country are greatly affected.

It is obvious that such an important legislative initiative should be accompanied by a sufficiently long public consultation. However, the period of only 7 days that you specified for submitting comments and proposals suffocates the scope for meaningful public debate and, in essence, is a reproach to every interested body and citizen in the context of good governance.

In addition, we point out that the settlement of the issues attempted by the draft law is critical and, for many of these issues, has been delayed for many years. From this point of view, the state's perennial, and cross-party failure to adequately address these critical issues cannot justify the urgency of the proposed changes, but neither should that urgency be exhausted in the reduction of consultation time.

Based on the above, we invite you to immediately extend the final date of the consultation to one month, thus giving space to the public debate that our country so much needs, in order to deal effectively and fairly with the major environmental challenges of our time, but also in compliance with the provisions of the international Aarhus Convention and the national sanctioning law for public participation in the formulation of environmental policies [Article 7 of Law 3422/2005 (A' 303) on the ratification of the Convention on Access to Information, public participation in decision-making and access to justice on environmental issues].