



HELLENIC REPUBLIC
MINISTRY OF FINANCE
SECRETARIAT-GENERAL FOR ECONOMIC POLICY
CENTRAL STATE AID UNIT

SGEI REPORT FOR THE YEAR 2020

(In accordance with the 2012 SGEI Decision and the SGEI framework 2012)

OVERVIEW OF EXPENDITURE

Total SGEI government expenditure by legal basis (EUR millions)		
	2018	2019
<i>Compensation for services of general economic interest (1+2)</i>	733 326 782.03	781 198 905.40
(1) Compensation granted on the basis of the SGEI Decision	27 326 782.03	48 198 905.40
(2) Compensation granted on the basis of the SGEI Framework	706 000 000 ¹	733 000 000 ²

¹ In 2018, ELTA (Hellenic Post) was paid EUR 60 million for the years 2013-2014, 2015 and 2016. As regards the imposition of obligations to provide services of general interest (SGI) on the Non-Interconnected Islands (NII), the amount of EUR 646 million is estimated on the basis of preliminary payments of the Hellenic Electricity Distribution Network Operator (DEDDIE).

² In 2019, ELTA (Hellenic Post) was paid EUR 45 million for the years 2017, 2018 and 2019. As regards the imposition of an obligation to provide services of general interest (SGI) on the Non-Interconnected Islands (NII), the amount of EUR 688 million is estimated on the basis of preliminary payments of the Hellenic Electricity Distribution Network Operator (DEDDIE).

APPLICABILITY OF THE 2012 SGEI DECISION

1. SOCIAL SERVICES

A. ORGANISATION: MINISTRY OF DEVELOPMENT AND INVESTMENT, NSRF Executive Structure, Employment and Social Economy Sector.

Clear and comprehensive description of how the respective services are organised in your Member State

Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the **contents of the services entrusted as SGEI** as clearly as possible.

Actions A (Vocational Counselling) and B (Training, Retraining and Vocational Training) were implemented as Services of General Economic Interest under the Commission Decision of 20 December 2011 on the application of Article 106(2) of the Treaty on the Functioning of the European Union to State aid in the form of public service compensation granted to certain undertakings entrusted with the operation of services of general economic interest, and the Commission Communication of 11 January 2012 on the application of the European Union State aid rules to compensation granted for the provision of services of general economic interest.

The SGEI described concerns the provision of support to **217 people made redundant** from the following companies: ILEKTRONIKI ATHINON A.E.E., DIXONS SOUTH-EAST EUROPE AEBE, MEDIA SATURN ILEKTRONIKA ELLAS EMPORIKI KAI SIMMETOCHIKI ANONIMI ETAIREIA, ATHINI CHONTOS A.E.E. POLIKATASTIMA, ADELFI VEROPOULI ANONIMOS EMPORIKI KAI VIOMICHANIKI ETAIREIA AE, METRO AEBE, NOTOS COM SIMMETOCHES AEBE, PET CITY AEBE, SARAFIDIS A.E. of the sector entitled: 'Wholesale trade, except for motor vehicles and motorcycles', in the Regions of Eastern Macedonia and Thrace, Central Macedonia, Western Macedonia, Thessaly, Epirus, Western Greece, Central Greece, the Peloponnese, Attica, South Aegean and Crete, which have ceased trading or have dismissed workers as a result of the economic crisis.

In particular, this involved **providing vocational counselling and training services** (continuing vocational training or specialised education/training) with the **main objective** of helping the beneficiaries to find work.

The **vocational counselling** consisted in twenty-five (25) individual sessions of 45 minutes for each beneficiary. The individual counselling activities carried out in the context of vocational counselling include:

1. Reception – registration of beneficiaries and investigation of needs (2 sessions).
2. Personal and vocational stocktaking (2 sessions).
3. Personal and professional development process, preparation of an initial/summary action plan and referral to actions (6 sessions).
4. Development and processing of a detailed specific individual action plan (10 sessions).
5. Follow-up/support for beneficiaries (5 sessions).

The above services were addressed to all the beneficiaries (217 persons) and carried out by the Implementing Body, the National Institute of Labour and Human Resources (EIEAD) and the participating organisations: the Institute of Commerce and Services (INEMY), the Greek Confederation of Commerce and Entrepreneurship (ESEE), the Small Enterprises' Institute of the Hellenic Confederation of Professionals, Craftsmen and Merchants (IME GSEVEE), and the Labour Institute of the Greek General Confederation of Labour (INE GSEE).

In addition, as part of the vocational counselling services, **22 business plans were prepared for 25 beneficiaries** who expressed an interest in participating in Action C 'Subsidy for setting up a business'.

Finally, **seven open days** were held in the Regions of Attica, Eastern Macedonia and Thrace, Central Macedonia, Western Macedonia, Thessaly, Central Greece and the Peloponnese, to inform beneficiaries about possible opportunities to enter the local labour market.

The **training, retraining and vocational training** were to provide vocational training courses for beneficiaries to meet their needs and the current needs of the labour market.

172 beneficiaries were eligible for Action B, which included the following:

ACTION B1: 'Continuing vocational training' (subsidised continuing vocational training programmes), the main objective being to help **166 beneficiaries** to enter, re-enter or stay in the labour market. Given the wide dispersal of the beneficiaries in Greece, the Action was carried out through conventional (face-to-face) training for **47 beneficiaries** and through distance training (because of geographical spread and because it was not possible to set up a unit in all intervention areas) for **119 beneficiaries**. The vocational training programmes, of a total duration of 300 hours each, consisted of a theoretical and a practical part, on the following main subjects:

- o Horizontal and interpersonal skills (cooperation, communication, understanding and problem-solving, planning, entrepreneurship);
- o Digital skills (copywriter, spreadsheets, internet, new digital skills)
- o Specialised professional skills (office work, retail, sales promotion, warehouse management).

Upon completion of the training programmes, all the beneficiaries were **certified** by an approved body for the skills they had acquired.

ACTION B2: 'Specialised training/further training' concerns the provision of specialised or specific education/training. In this action, **six beneficiaries** were eligible, without an education allowance. The beneficiaries, in cooperation with the specialist advisers, selected certified providers in order to be trained in the following specialised subjects:

- o Professional make-up (2 beneficiaries)
- o Nail cosmetics (1 beneficiary)
- o Certified e-commerce consultant (1 beneficiary)
- o AUTOCAD 2D & 3D software (1 beneficiary)
- o SOLIDWORKS ESSENTIALS software (1 beneficiary)

Acquired knowledge is confirmed through the 'Certificates of Acquired Knowledge' issued by the approved training providers.

The SGEI described was aimed at people who have been made redundant from the above companies and remain unemployed. In addition to the unemployed, it was also aimed at people who had found (or who would find during the Action) a job on a part-time or full-time basis and/or for a limited period. The people in work had to be also classified as members of vulnerable groups or as 'disadvantaged workers' on the basis of Article 2(4) of the General Block Exemption Regulation, which covers any person who: (a) has not been in regular paid employment for the previous six months, or (b) is aged between 15 and 24 years, or (c) has not completed upper secondary education or vocational training (International Standard Classification of Education – ISCED 3) or they completed full-time education less than two years before and have not previously obtained their first regular paid employment, or (d) is over 50 years of age, or (e) lives as a single adult with one or more

<p>dependants, or (f) works, in a Member State, in a sector or profession where the gender imbalance is at least 25% higher than the average gender imbalance across all economic sectors in that Member State, and belongs to the underrepresented gender group, or (g) is a member of an ethnic minority within a Member State and requires development of their linguistic, vocational training or work experience profile to enhance their prospects of gaining access to stable employment. In such cases, the services would be offered at times outside the beneficiaries' working hours.</p>
<p>Explanation of the (typical) forms of entrustment. If standardised templates for entrustments are used for a certain sector, please attach them.</p>
<p>Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.</p>
<p>1 year</p>
<p>Explanation whether (typically) exclusive or special rights are assigned to the undertakings.</p>
<p>The SGEI providers were the National Labour and Human Resource Institute (EIEAD), the GSEE Labour Institute (INE GSEE), the Institute for Small Business of the Greek Confederation of Professionals, Craftsmen and Merchants (IME GSEVEE), the Institute for Trade and Services (IN.EM.Y), the Vocational Training Centre of the GSEE Labour Institute (CIS GSEE), the Vocational Training Centre of the Greek Confederation of Professionals, Craftsmen and Merchants (KEK GSEVEE), and the Centre for the Development of Greek Commerce and Entrepreneurship (KAELE).</p> <p>The main features of the service provided and, by extension, the classification of the service as an SGEI were:</p> <ol style="list-style-type: none"> 1. It was addressed to citizens and in particular to 217 people (beneficiaries who eventually joined the project out of 725 people who were potential beneficiaries) who had been made redundant from certain companies in the intervention area, who make up the entire beneficiary population. 2. The services of this SGEI are economic activities which, however, produce effects for the general public benefit and could not have been provided by the market without the intervention of the State, or might have been provided under different conditions of quality, safety, affordability, equal treatment or universal access. 3. The set of services required to achieve the objectives of this SGEI, as combined integrated social services of the State to address the exclusion of unemployed persons from the labour market, was not provided in the internal market by individual operators/undertakings, satisfactorily and under terms of e.g. price, objective characteristics of quality, continuity and access to the service, applying under normal market conditions. 4. The services were provided for a specified period (1 October 2018 to 13 July 2019) in a demarcated intervention area comprising the following 11 Regions: Eastern Macedonia and Thrace, Central Macedonia, Western Macedonia, Thessaly, Epirus, Western Greece, Central Greece, the Peloponnese, Attica, South Aegean and Crete. The participating implementing organisations had facilities in all these Regions covering the necessary geographical scope of this

SGEI (see in detail below in section 3).	
Which aid instruments have been used (direct subsidies, guarantees, etc.)?	
Direct subsidy	
Typical compensation mechanism as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.	
<p>The compensation related to all costs incurred in the implementation of the SGEI provided and was set at EUR 891 549.48.</p> <p>In order to address the problem of overcompensation, account was taken of the following:</p> <ul style="list-style-type: none"> ▪ To facilitate control, the implementing body created a dedicated account in its accounting system. ▪ It opened a special bank account for the project. ▪ The amount of compensation was audited by the Union of Implementing Bodies, the Managing Authority (NSRF Executive Structure – Employment and Social Economy Sector), the Certifying Authority and EDEL, and directly related to the final number of beneficiaries who participated in the Programme. 	
Typical arrangements for avoiding and repaying any overcompensation.	
Possible overcompensation was checked by the implementing bodies when monitoring and taking stock of the physical and financial object of the project.	
A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for aid above EUR 15 million to undertakings that also have activities outside the scope of the SGEI are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).	
Amount of aid granted	
Total amount of aid granted (in EUR millions)⁶. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)	
2018	2019
	891 549.48
A: Total amount of aid granted (in EUR millions) paid by national central authorities¹	
2018	2019

B: Total amount of aid granted (in EUR millions) paid by regional authorities⁸	
2018	2019
C: Total amount of aid granted (in EUR millions) paid by local authorities²	
2018	2019
Share of expenditure per aid instrument (direct subsidy, guarantees, etc.) (if available)	
2018	2019
Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of the undertakings)	
2018	2019

¹ If the aid amount cannot be split between central, regional and local authorities only the total amount of aid granted for all authorities should be reported. ⁸ See footnote 7.

² See footnote 7.

B. ORGANISATION: Region of Central Macedonia – Special Operational Programme Service

Clear and comprehensive description of how the respective services are organised in your Member State
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.
A. Counselling and training for the unemployed in the RIS3 manufacturing sectors in the Region of Central Macedonia Vocational counselling, vocational training, certification of knowledge and skills and specialised entrepreneurship counselling for unemployed persons. B. Development of the qualifications of the long-term unemployed with low educational qualifications Counselling, training, certification of long-term unemployed persons with low educational qualifications to strengthen and develop their knowledge and skills, in order to facilitate their access and re-entry to the labour market. C. Promoting the employment of people from vulnerable social groups Counselling, training, certification and support for the entrepreneurship skills of individuals from vulnerable social groups, to advance them and to try to reintegrate them into employment, and to encourage their social reintegration.
Explanation of the (typical) forms of entrustment . If standardised templates for entrustments are used for a certain sector, please attach them.
The decision to award the SGEI consists of the decision to grant financing, supported by the relevant documents demonstrating compliance with Decision 2012/21/EU and the parameters for determining compensation, and the calculation of the compensation, in particular through <ul style="list-style-type: none">• the report documenting the SGEI• the financial breakdown of the determination of compensation and supporting regulatory and administrative acts such as:• the legislative framework governing waste management• the approved Regional Waste Management Plan (RWMP) of the relevant Region where the service is provided• the legislative framework for the establishment and operation of the SGEI provider concerned• the legislative framework of public procurement, the management and control system (MCS) of the NSRF 2014-2020
Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.

<p>A. Advice and training for the unemployed in the RIS3 manufacturing sectors in the Region of Central Macedonia – 2 years</p> <p>B. Development of the vocational qualifications of the long-term unemployed with low educational qualifications – 2 years</p> <p>C. Promotion of employment of individuals from vulnerable social groups – 2 years</p>
<p>Explanation whether (typically) exclusive or special rights are assigned to the undertakings.</p>
<p>No exclusive or special rights have been assigned to the recipients of the grant beyond what is already provided for by the applicable framework governing their responsibilities.</p>
<p>Which aid instruments have been used (direct subsidies, guarantees, etc.)?</p>
<p>Typical compensation mechanism as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.</p>
<p>Typical arrangements for avoiding and repaying any overcompensation.</p> <p>Designation of a control body to avoid overcompensation</p> <p>The control body for ensuring avoidance of overcompensation is Unit B of the Managing Authority of the OP for the Region of Central Macedonia; control is carried out by implementing the procedures of the MCS (Ministerial Decision 110427/EYΘY/1020 (GG II 3521/1.11.2016), as amended).</p> <p>Control parameters</p> <p>The following are checked during the control procedure:</p> <ul style="list-style-type: none"> • Content and duration of the SGEI • Geographical area where the service is provided • Amount of compensation <p>Control of compensation will be carried out through the following procedures:</p> <p>1. Prior approval of tender documents (when required). The provider submits the draft tender documents to Unit B of the MA of the OP for the Region of Central Macedonia to check their content in relation to the approved SGEI (physical scope, timetable for implementation, cost of services provided) and thus ensure that the services to be awarded to a contractor are identical to the approved SGEI, and that the maximum cost is within the budgeted cost in this report.</p> <p>2. Pre-approval of contracts (when required). The provider submits the draft contract to Unit B of the MA of the OP for the Region of Central Macedonia to:</p> <p>(a) detect failures in complying with EU and national rules during the procedure for the procurement of services in order to ensure compliance with the principles of equal treatment, non-discrimination, mutual recognition, proportionality and transparency;</p> <p>(b) check the content of contracts in relation to the approved SGEI (physical scope, timetable for implementation, cost of services provided) to ensure that the services to be awarded to a contractor are identical to the approved SGEI, and that the maximum cost is within the budgeted cost in this report.</p>

3. The administrative checks on expenditure and deliverables of the service/operation, as described at the individual stages of description of the service in this report (Chapter 6). The service provider submits their deliverables as an annex to the Statement of Expenditure Sheet. The purpose of this procedure is for Unit B of the MA of the OP for the Region of Central Macedonia to verify that declared expenditure has been incurred and the physical scope of the operation has been delivered, in accordance with the conditions and obligations assumed by the beneficiary to implement the SGEI on the basis of this report.

4. On-site inspections. The purpose of the procedure is for Unit B of the MA of the OP for the Region of Central Macedonia to make sure that the services have been delivered and that the administratively verified expenditure has been incurred, in accordance with the approved SGEI, where the above cannot be verified administratively.

5. Completion of service/operation. The purpose of the procedure is for Unit B of the MA of the OP for the Region of Central Macedonia to confirm the completion and delivery of the SGEI in accordance with the terms and conditions of its approval.

Procedures to verify of the level of compensation

The above procedures are to check implementation of the physical and financial scope of the service/operation in accordance with the inclusion decision and the report documenting the SGEI, which forms an integral part thereof, thereby checking and preventing overcompensation of the SGEI.

Given that the duration of the SGEI service provided is less than three years, Unit B will draw up a report on checking avoidance of overcompensation at the end of the period of entrustment; this will be the completion report (which includes (a) a description of the physical scope of the service, (b) the deliverables of the service, (c) the results of the service and (d) the level of compensation) as provided for in the MCS (MD 110427/EYØY/1020 (GG II 3521/1.11.2016), as amended). This report contains all the important elements of the physical and financial scope of the SGEI and constitutes final confirmation that the service has been carried out in accordance with the terms and conditions of its approval.

Mechanism for recovery of overcompensation

The mechanism for the recovery of overcompensation (in the event of overcompensation discovered following the checks referred to in 8.2) is set out in the MCS (MD 110427/EYØY/1020 (GG II 3521/1.11.2016), as amended). More specifically: If the administrative checks or the on-site inspections reveal overcompensation, a financial correction or recovery is carried out, approved by the Regional Governor, and the Decision on Financial Correction/Recovery is notified to the SGEI provider by registered letter with acknowledgement of receipt.

A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for aid above 15 million euro to undertakings that also have activities outside the scope of the SGEI) are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).

Amount of aid granted

Total amount of aid granted (in EUR millions). Includes all aid paid in your territory, including aid paid by regional and local authorities. (A+B+C)

2018	2019
23 527.24	6 255 641
A: Total amount of aid granted (in EUR millions) paid by national central authorities	
2018	2019
B: Total amount of aid granted (in EUR millions) paid by regional authorities	
2018	2019
C: Total amount of aid granted (in EUR millions) paid by local authorities	
2018	2019
Share of expenditure per aid instrument (direct subsidy, guarantees, etc.) (if available)	
2018	2019

C. ORGANISATION: Ministry of Labour

Clear and comprehensive description of how the respective services are organised in your Member State
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.
The disabled persons campsite programme is implemented pursuant to the provisions of Article 57(2)(c) of Law 4520/2018 on the conversion of the Agricultural Insurance Organisation into the Organisation for Welfare Benefits and Social Solidarity (OPEKA) and other provisions (GG I 30/2018).
Explanation of the (typical) forms of entrustment . If standardised templates for entrustments are used for a certain sector, please attach them.
By joint decision of the Minister for Labour, Social Security and Social Solidarity and the Minister for Finance, the special certified bodies referred to in Article 5 may be entrusted with providing support services for the organisation and operation of campsites for vulnerable groups of the population within or in addition to the public programme.
Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.
The 'Camping for the disabled' programme was carried out every year from July to October.
Explanation whether (typically) exclusive or special rights are assigned to the undertakings.
-
Which aid instruments have been used (direct subsidies, grants, guarantees, etc.)?
To implement the 'Camping for the disabled' programme appropriations were entered in the budget of our Ministry which were used to finance the body entrusted by Joint Ministerial Decision to organise and run campsites for people with disabilities.
Explanation of the (typical) compensation mechanism as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.
The contracted parties were compensated for the total number of beneficiaries of the programme who were hosted on the basis of a daily subsistence allowance per person, the amount of which was defined and fixed, bearing in mind that each beneficiary was hosted for a total of seven days.
Explanation of the (typical) arrangements for avoiding and repaying (recovering) any overcompensation .

A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above EUR 15 million to undertakings that also have activities outside the scope of the SGEI) are being complied with.	
Amount of aid granted	
Total amount of aid granted. This includes all aid paid in your territory, including aid paid by regional and local authorities for the years 2016 and 2017.	
2018	2019
EUR 583 843.93	EUR 607 823.43
Share of expenditure per aid instrument (direct subsidy, guarantees, etc.) (if available)	
2018	2019
Other quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of undertakings)	
2018: Number of beneficiaries: 2 477 people 2019: Number of beneficiaries: 2 813 people	

D. ORGANISATION: Ministry of Labour

Clear and comprehensive description of how the respective services are organised in your Member State.

Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the **contents of the services entrusted as SGEI** as clearly as possible.

The services classified as social SGEI fall into two categories:

A) Provision and operation of structures to tackle poverty in various municipalities in the country. These structures include:

- Social pharmacy,
- Social grocery store,
- Social meals scheme,
- Mediation office,
- Time bank,
- Homeless day reception centre,
- Homeless hostel.

Through the operation of the above facilities, psychosocial support and information services are also provided for the empowerment and social integration of the beneficiaries.

B) Provision of services for sensitive/vulnerable groups such as asylum seekers, single parent families, victims of torture and/or trafficking, unaccompanied foreign minors (asylum seekers – refugees), adult refugees, minors (children and adolescents) at risk, women at risk or victims of abuse, etc. The services provided include:

- Hosting and accommodation facilities, in the form of organised hostels or apartments for the vulnerable groups, both adults and minors;
- Legal support and mediation services;
- Greek language teaching services;
- Coverage of the beneficiaries' food and clothing needs;
- Caring for the social inclusion of unaccompanied foreign minors (enrolment in school, extracurricular activities, entertainment, extra tuition, creative activities, etc.);
- Psychosocial and medical support;
- Activities for informing and raising public awareness on the refugee issue;
- Development of emergency response plans for minors and women at risk or in crisis (through the provision of sheltered hospitality services and psychosocial, medical and nursing support and care);
- Operation of an organised accommodation site and provision of urgent food, medical and social care to third-country nationals who have recently entered Greece and are potentially eligible for international protection.

In 2016 the above services were entrusted to 34 providers, which are mainly civil non-profit companies and non-profit associations engaged in the provision of social care and care services.

Explanation of the (typical) forms of entrustment . If standardised templates for entrustments are used for a certain sector, please attach them.
SGEIs are entrusted through the conclusion of programming contracts between providers and the competent ministry (Ministry of Labour, Ministry of Social Security and Social Solidarity – Secretariat-General for Welfare). The programming contracts expressly stipulate the obligations of providers.
Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.
The duration of the entrustment is usually 14 months. Extensions of two to ten months were granted.
Explanation whether (typically) exclusive or special rights are assigned to the undertakings.
On the basis of the framework and the nature of the provided services, no exclusive or special rights are granted.
Which aid instruments have been used (direct subsidies, grants, guarantees, etc.)?
<p>The SGEIs described above are financed by subsidies from the State budget. Specifically, they are financed:</p> <p>A) either via the Public Investment Programme – National Part, in the framework of the following projects:</p> <ul style="list-style-type: none"> - 'Social structures for directly addressing poverty' - 'Reception and accommodation programmes for beneficiaries of international protection' <p>B) or through the ordinary budget of the Ministry of Labour, Social Security and Social Solidarity ('Grant to other social welfare institutions');</p> <p>(C) or via the European Refugee Fund 2008-2013 as part of the General Programme 'Solidarity and management of migration flows'</p>
Explanation of the (typical) compensation mechanism as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.
<p>The relevant programming contracts explicitly state that funding is limited to the amount necessary to balance the project's revenue and expenditure, and that the funding can in no way secure a profit for the SGEI provider.</p> <p>Furthermore, in the case of financing from the ordinary budget, the amount of funding is based on the financing of the same programmes under previous programming contracts, taking into account the following:</p> <ul style="list-style-type: none"> (a) the amount of expenditure incurred for the provision of exactly the same services; (b) the reports by the competent Monitoring Committee;

(c) the budget submitted by the SGEI provider. Moreover, the programming contracts stipulate that any unspent funds already paid to the organisation will be returned to the Ministry of Labour, Social Security and Social Solidarity.	
Explanation of the (typical) arrangements for avoiding and repaying (recovering) any overcompensation.	
The programming contracts describe the arrangements for financing projects, payments to the SGEI provider and for avoiding and repaying any overcompensation.	
A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above 15 million euro to undertakings that also have activities outside the scope of the SGEI) are being complied with.	
Not applicable.	
Amounts of aid granted	
Total amount of aid granted. This includes all aid paid in your territory, including aid paid by regional and local authorities for the years 2018 and 2019.	
2018	2019
Included in the 2018 Report	Included in the 2018 Report
Share of expenditure per aid instrument (direct subsidy, guarantees, etc.) (if available)	
2018	2019
Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of undertakings)	

2. WASTE COLLECTION AND MANAGEMENT

A. ORGANISATION: Ministry of Development and Investment, Managing Authority for the OP 'Transport, Infrastructure, Environment, Sustainable Development'

Clear and comprehensive description of how the respective services are organised in your Member State.

Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.

MUNICIPAL SOLID WASTE MANAGEMENT SECTOR

Management of municipal waste (household and similar waste) is a service of general interest which is in compliance with the national and European legal and legislative framework. It is of general interest in the sense that it is addressed to citizens and is in the interest of society as a whole as it serves the specific objectives linked to the protection of public health and the quality of soil systems.

The management of municipal solid waste (MSW) is a responsibility assigned to first-tier local authorities (municipalities). The responsibility of the local authorities for managing municipal waste is laid down in Article 102(1) of the Constitution and is specified, as required by this Article, in Article 75(1)(b)(4) of Law 3463/2006. This responsibility has been reflected over time in a series of laws and ministerial decisions (Law 1650/1986, Joint Ministerial Decision 50910/2727/2003, Law 3463/2006, Joint Ministerial Decision 2527/2009, Law 4071/2012, Law 4555/2018, Law 4685/2020), and Law 4042/2012 lays down the general framework of conditions and obligations governing the general management of waste in implementation of Directive 2008/98/EU.

According to Law 4042/2012, as in force following Law 4555/2018 and Law 4685/2020, the Regional Waste Management Plan (RWMP) of each Region is prepared by the relevant regional Solid Waste Management Operators (SWMO) or the Region, if there is no Regional SWMO, approved by decision of the corresponding Regional Council and ratified by a Joint Ministerial Decision. The RWMP clearly determines how municipal waste should be managed in each geographical unit (management unit) to achieve the objectives set, which have to comply with the national target of the National Waste Management Plan and the relevant national and EU waste management legislation. The RWMP sets out the targeted management operations per waste stream in each area, the infrastructure necessary to carry out those tasks, and the bodies responsible for providing each service/task (municipalities and SWMOs).

To sum up, the municipalities have the institutional responsibility for managing municipal solid waste (collection and transport of waste, sorting operations at source and for transfer, treatment, recovery and final disposal) through the SWMOs, which they must participate in, for the purpose of implementing the strategy of the National Waste Management Plan and the relevant Regional Waste Management Plan.

In the above context, consideration is given to financing actions relating to the construction of infrastructure, supply of equipment and provision of services to enable the collection, transport, temporary storage, transfer, recovery and disposal of municipal waste which constitute special cases of economic activities (resulting from the charging of fees or exploitation of the products), which are in the general public interest and could not be provided by the market without State intervention, taking into account, on a case-by-case basis, the provisions of the legislative framework for SGEIs

(SGEI Decision or SGEI Framework or *de minimis* Regulation or SGEI Communication).

The Managing Authority for the OP 'Transport Infrastructure, Environment and Sustainable Development' of the Ministry of Development and Investment finances the following actions relating to the provision of the corresponding SGEIs and supported in accordance with Decision No 2012/21/EU.

1. Treatment of mixed municipal waste and pre-sorted biowaste for the 2nd Management Unit of Viotia (MIS 5001123)

The service covers the treatment of solid municipal waste from the municipalities of Thiva, Aliartos and Tanagra in the Prefecture of Viotia. The treatment service comprises the collection of the waste to be treated, mechanical separation into individual streams and sorting of recoverable materials, anaerobic biological treatment of the organic fraction, stabilisation and storage of the inactivated product (compost) and storage of the produced biogas. Use of the biogas produced as energy is not included in the SGEI. For the SGEI provider, the Regional SWMO of Central Greece, to provide this service properly requires investment to build a waste treatment plant (WTP) in Thiva to treat 42 150 t/y of municipal waste, including 1 850 t/y of pre-sorted organic waste from the municipalities served.

The financing of the section of the WTP concerning the use of produced biogas as energy is addressed separately under Regulation (EU) No 651/2014.

2. Treatment of pre-sorted biowaste and safe disposal of residues and residual mixed waste for the Prefecture of Fokida (MIS 5001154)

The service covers the composting of an organic fraction of municipal waste and the safe disposal of the treatment residue and the residual mixed municipal waste in a landfill to serve the municipalities of Delphi and Dorida of the Regional Unit of Fokida in the Region of Central Greece. More specifically, the service comprises collecting an organic fraction pre-sorted at source, biological treatment, storage of produced inactivated product (compost) and depositing of residues in the landfill site. For the SGEI provider (the Regional SWMO of Central Greece) to provide this service properly requires investment to build a composting plant to treat pre-sorted organic and green waste with an annual capacity of 6 250 t/year, and a landfill site with an average annual capacity of 20 000 t/year for non-hazardous solid waste, total volume 362 487 m³, to serve the municipalities of the Regional Unit of Fokida. The establishment of the necessary infrastructure includes improving the existing 1.325 km dirt access road and procurement of the equipment for the solid waste treatment plant.

3. Treatment of mixed municipal waste and pre-sorted biowaste and safe disposal of residues for the Regional Unit of Rethymno at Amari (MIS 5001123)

The service provided covers integrated management through the recovery and disposal of municipal solid waste of the Regional Unit of Rethymno in the Region of Crete. More specifically it comprises collection of the municipal waste to be treated (mixed municipal waste and a pre-sorted organic fraction of municipal waste), mechanical separation into individual streams and sorting of

recoverable materials, anaerobic biological treatment of the organic fraction to produce digestate and biogas that can be used to produce energy, stabilisation by composting the digestate from pre-sorted organic waste to produce compost, storage of produced inactivated product (compost) and depositing of residues in the landfill site.

For the SGEI provider (Solid Waste Management Association, Crete) to provide this service properly requires investment to build a waste treatment plant in Amari, Rethymno, to treat 35 600 t/y of mixed municipal waste and 7 400 t/y of pre-sorted organic waste, and to extend the Amari landfill site for the disposal of treatment residues. The treatment residues are directed to the adjacent landfill site, which is to be extended as part of the investment for the provision of the SGEI under this action.

The financing of the section concerning the energy use of produced biogas is addressed separately under Regulation (EU) No 651/2014.

4. Treatment of mixed municipal waste and pre-sorted biowaste and safe disposal of residues on the island of Zakynthos (MIS 5001681)

The service provided covers integrated management through the recovery and disposal of municipal solid waste of the Regional Unit of Zakynthos. More specifically it comprises collection of the municipal waste to be treated, mechanical separation into individual streams and sorting of recoverable materials, aerobic biological treatment (composting) of the separated and pre-sorted organic fraction, refining and maturation of the resulting organic products (compost from pre-sorted organic and type A compost from a separated organic fraction) and final disposal of treatment residues in the adjacent landfill site. For the SGEI provider (Zakynthos Waste Management Association) to provide this service properly requires investment to build a waste treatment plant in the district of LIVES in the municipal unit of Artemisio, municipality of Zakynthos, to treat a total of 24 144 t/y of waste, including 4 800 t/y of pre-sorted organic waste, and to build a landfill site in the same place with a phase 1 capacity of 170 000 m³ to dispose of treatment residues.

5. Treatment of mixed municipal waste and pre-sorted biowaste in the eastern part of Eastern Macedonia and Thrace in Alexandroupoli (MIS 50017770)

The service provided covers integrated management through the recovery of municipal solid waste of the municipalities of the Regional Unit of Rodopi and the municipalities of Alexandroupoli and Soufli of the Regional Unit of Evros in the Region of Eastern Macedonia and Thrace. This SGEI comprises more specifically the collection of the municipal waste to be treated (mixed municipal waste and a pre-sorted organic fraction of municipal waste), mechanical separation into individual streams and sorting of recoverable materials, anaerobic biological treatment of the organic fraction to produce digestate and biogas that can be used to produce energy, stabilisation by composting the digestate to produce type A compost, composting of pre-sorted organic waste to produce compost, and storage of the products. For the SGEI provider (Waste Management Company of Eastern Macedonia) to provide this service properly requires investment to build a waste treatment plant with an overall capacity of 44 826 t/y, including mixed municipal waste of 38 855 t/y and an organic fraction pre-selected at source of 5 971 t/y. The financing of the section concerning the use of produced biogas for energy does not concern this SGEI and is addressed separately under Regulation (EU) No 651/2014 (General Block Exemption Regulation).

6. Treatment of municipal waste for the Regional Unit of Ilia (MIS 5009847)

The service covers the mechanical and biological treatment of residual municipal waste which is sent for further treatment to waste treatment plants after separate collection of recyclable waste and biowaste, and the organic fraction pre-sorted at source, collected through a separate biowaste collection network in the municipalities of the Regional Unit of Ilia in the Region of Western Greece. This SGEI comprises more specifically the collection of the waste to be treated, mechanical separation into individual streams and sorting of recoverable materials, anaerobic biological treatment of the organic fraction to produce digestate and biogas that can be used to produce energy, composting of the digestate to produce compost-type soil material and storage of the products. For the SGEI provider (municipality of Ilida) to provide this service properly requires investment to build a waste treatment plant with a capacity of between 60 000 t/y and 80 000 t/y to treat residual mixed municipal waste and the organic fraction pre-sorted at source. The plant recovers recyclable materials, produces compost-type soil material, produces biogas which is stored in order to use the energy and produces residue from all stages of treatment, which needs to be sent to landfill. The financing of the section concerning the use of produced biogas for energy does not concern this SGEI and is addressed separately under Regulation (EU) No 651/2014 (General Block Exemption Regulation).

7. Transfer of municipal waste for the municipality of Kymi-Aliveri (MIS 5001255)

The service covers the transfer of mixed municipal solid waste and of recyclable materials collected from the municipality of Kymi-Aliveri and their subsequent transfer to the Chalkis and Thiva landfill sites, and to the facilities of the Schimatari recyclable materials sorting centre (RMSC) respectively. During transfer, waste collected by refuse collection trucks is transferred to other collection or transfer vehicles specially designed and built for transport. During transfer, waste is compacted to maximise the load of the transfer vehicles. For the SGEI provider (Regional SWMO of Central Greece) to provide the service properly requires investment to build transfer stations in the municipal communities of Kymi and Alevi to supply the necessary mobile equipment, ensure connections to public utilities and improve road access to the waste transfer stations. The Kymi waste transfer station, with a capacity of 32.9 tonnes of municipal solid waste, will deal with the municipal solid waste (MSW) to be collected from the municipal units of Kymi and Konistres, and the Aliveri waste transfer station, with a capacity of 61.5 tonnes of MSW and 14.4 tonnes of recyclable materials, will deal with the MSW to be collected from the municipal units of Tamynaia, Avlonas and Dystos and the recyclable materials collected from the entire municipality of Kymi-Aliveri.

8. Transfer of municipal waste for the municipality of Karystos (MIS 5001837)

The service covers the transfer of municipal solid waste collected from the municipality of Karystos and then transported to the Chalkida and Thiva landfill sites. During transfer, municipal waste collected by refuse collection vehicles is transferred to other collection or transfer vehicles specially designed and built for transport. During transfer waste is compacted to maximise the load of the transfer vehicles. The waste is compacted (with densities of up to 0.5 tonnes/m³) using a special press incorporated into each truck. For the SGEI provider (Regional SWMO of Central Greece) to provide the municipal waste transfer service properly requires investment to supply and install the necessary mobile equipment at the waste transfer station of the municipality of Karystos and to complete the access route to the transfer station.

9. Transfer of municipal waste for the Municipalities of Athens and Aigaleo (MIS 5001473)

The service covers the transfer of municipal solid waste collected from the Municipalities of Athens and Aigaleo and then transported to the Western Attica landfill site. In the transfer area, the municipal waste collected by the refuse collection trucks is deposited in a metal pit and is pushed into empty containers where it is compacted. The containers filled with waste are placed on suitable transfer vehicles and sent to the Western Attica landfill site, where they release their load and return to the transfer station. For the SGEI provider (municipality of Athens) to provide the municipal waste transfer service properly requires investment to build the infrastructure and procure and install the necessary equipment at the Elaionas waste transfer station.

10. Safe disposal of municipal waste by landfill on the island of Kea (MIS 5010474)

The service covers the safe disposal of municipal solid waste in the municipality of Kea by landfill in accordance with the approved South Aegean Regional Waste Management Plan.

The amount of MSW expected to be managed by the SGEI provider (municipality of Kea) is 2 937 t/y (base year 2018) with an annual increase of 1%; in 20 years 3 444 t/y. For the SGEI provider to provide the service properly requires investment to build the landfill site in the municipality of Kea with associated works for leachate collection, biogas management, etc., and the necessary works to improve the roads. In addition, in order to provide the service of final disposal of waste, the managing body has to acquire the required land area to build the infrastructure and acquire mobile infrastructure equipment.

11. Safe disposal of municipal waste by landfill on the island of Kos (MIS 5009884)

The service covers the safe disposal of the municipal solid waste generated in the municipality of Kos by landfill on the island of Kos. For the SGEI provider (municipality of Kos) to provide the service properly requires investment to build phase 2 of the Kos landfill, which is located at the Matiades site in the municipal unit of Antimacheia of the municipality of Kos. Phase 2 covers a plot of land of 3.9 hectares, and the effective landfill area covers 2.8 hectares. The ancillary works required for the smooth operation of phase 2 will also be constructed and the leachate treatment facility will be upgraded to ensure that it can process the leachate produced.

12. Safe disposal of municipal waste by landfill in Southern Rhodes (MIS 5010484)

The service covers the safe disposal of municipal solid waste in the municipal units of Southern Rhodes, Lindos, Kameiros, Attavyros and Archangelos and the Island of Chalkis by landfill in accordance with the approved South Aegean Regional Waste Management Plan. The amount of MSW expected to be managed by the SGEI provider (municipality of Rhodes) is 18 600 t/y (base year 2018); it is reckoned that this will be stable over the 12-year period of provision of the SGEI. For the SGEI provider to provide the service properly requires investment to build the landfill site in Southern Rhodes with the associated works for leachate collection, biogas management, connections to public utility networks, etc. In addition, in order to provide the service of final disposal of waste, the managing body has to acquire mobile infrastructure equipment.

13. Safe disposal of municipal waste treatment residues in the Regional Unit of Arta by landfill (MIS 5037435)

The service covers the safe final disposal by landfill of the residues resulting from the treatment of residual mixed municipal waste and biowaste pre-sorted at source, produced within the administrative boundaries of the served municipalities of the Regional Unit of Arta. According to the Epirus Regional Waste Management Plan, the average annual amount of residues to be safely disposed of from the treatment of municipal waste is estimated at 6 560 t/y, coming from the Epirus Region mixed municipal solid waste treatment plant and from the Arta Regional Unit composting plant.

For the SGEI provider (Compulsory Waste Management Association, Epirus Region management unit) to provide this service of safe disposal of municipal waste properly requires investment to build a new waste disposal cell at the Arta landfill site, with all the supporting facilities, and to upgrade the existing leachate treatment facility so that it can treat the leachate from the landfill site. The new landfill cell will have a capacity of at least 860 000 m³, including daily soil cover, and a lifetime of 28.5 years, receiving 6 560 tonnes of residues per year.

Explanation of the (typical) forms of entrustment. If standardised templates for entrustments are used for a certain sector, please attach them.

The decision to award the SGEI consists of the decision to grant financing, supported by the relevant documents demonstrating compliance with Decision 2012/21/EU and the parameters for determining compensation, and the calculation of the compensation, in particular through

- the report documenting the SGEI
- the financial breakdown of the determination of compensation and supporting regulatory and administrative acts such as:
- the legislative framework governing waste management
- the approved Regional Waste Management Plan (RWMP) of the relevant Region where the service is provided
- the legislative framework for the establishment and operation of the SGEI provider concerned
- the legislative framework of public procurement
- the management and control system (MCS) of the NSRF 2014-2020

Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.

In the waste management sector, the following general cases are usually distinguished:

Separate collection of waste (separate collection of biowaste and separate streams of recyclables at recycling points, 'green' points, etc.): Average duration of entrustment period of up to 10 years, including time to carry out any investment.

Transfer of waste: Average duration of entrustment period 25 years, including time to carry out any investment. The duration exceeds 10 years to allow for recovery of the investments necessary for provision of the service. These times are in accordance with the implementing framework of the financial instrument.

Waste treatment: Average duration of entrustment period 27 years, including time to carry out any investment. The duration exceeds 10 years to allow for recovery of the investments necessary for the provision of the service. These times are in accordance with the implementing framework of the financial instrument.

Safe disposal of waste by landfill: Average duration of entrustment period 20 years, including time to carry out any investment. The duration exceeds 10 years, depending on the useful lifetime and time to recover the investments necessary for provision of the service. These times are in accordance with the implementing framework of the financial instrument (ESIF).

The SGEIs described with expenditure in 2018 and 2019 comprise the following:

CODE	SERVICE	DURATION OF ENTRUSTMENT OF SGEI
5001154	TREATMENT OF PRE-SORTED BIOWASTE AND SAFE DISPOSAL OF RESIDUAL MIXED WASTE – REGIONAL UNIT OF FOKIDA	15
5001123	TREATMENT OF RESIDUAL MIXED WASTE AND PRE-SORTED BIOWASTE – 2nd MANAGEMENT UNIT OF THE REGIONAL UNIT OF VIOTIA	26

5001144	TREATMENT OF RESIDUAL MIXED WASTE AND PRE-SORTED BIOWASTE AND SAFE DISPOSAL OF RESIDUES – REGIONAL UNIT OF RETHYMNO	25
5001681	TREATMENT OF RESIDUAL MIXED WASTE AND PRE-SORTED BIOWASTE AND SAFE DISPOSAL OF RESIDUES – ISLAND OF ZAKYNTHOS	27
5001777	TREATMENT OF RESIDUAL MIXED WASTE AND PRE-SORTED BIOWASTE – EASTERN SECTOR OF THE REGION OF EASTERN MACEDONIA AND THRACE IN ALEXANDROUPOLI	26
5009847	TREATMENT OF RESIDUAL MIXED WASTE AND PRE-SORTED BIOWASTE – REGIONAL UNIT OF ILIA	32
5001255	TRANSFER OF MUNICIPAL WASTE – MUNICIPALITY OF KYMI-ALIVERI	25
5001837	TRANSFER OF MUNICIPAL WASTE – MUNICIPALITY OF KARYSTOS	10
5001473	TRANSFER OF MUNICIPAL WASTE – MUNICIPALITIES OF ATHENS AND AIGALEO	28
5010474	SAFE DISPOSAL OF WASTE BY LANDFILL – ISLAND OF KEA	20
5009884	SAFE DISPOSAL OF WASTE BY LANDFILL – ISLAND OF KOS	14
5010484	SAFE DISPOSAL OF WASTE BY LANDFILL - SOUTHERN RHODES	12
5037435	SAFE DISPOSAL OF WASTE BY LANDFILL – REGIONAL UNIT OF ARTA	30
Explanation whether (typically) exclusive or special rights are assigned to the undertakings.		
No exclusive or special rights have been assigned to the recipients of the grant beyond what is already provided for by the applicable framework governing their responsibilities.		
Which aid instruments have been used (direct subsidies, grants, guarantees, etc.)?		
<p>Direct subsidy from NSRF 2014-2020:</p> <p>Axis 14 of the OP 'Transport Infrastructure, Environment and Sustainable Development' financed from the Cohesion Fund</p> <p>Axis 14B of the OP 'Transport Infrastructure, Environment and Sustainable Development' financed from the ERDF</p>		

Explanation of the (typical) compensation mechanism as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.

The framework governing the operation of the financial instrument, the operation of the municipal waste management service providers (SWMO and municipalities) and the award and management of public contracts require application of the methodology based on cost allocation to calculate the amount of the grant.

The level of public financing is determined by means of a financial analysis to determine the compensation in accordance with the law on SGEIs.

For each individual case, the compensation paid for the services provided is limited to what is necessary to cover all or part of the costs incurred in meeting the obligation to provide the specified SGEI, taking into account the estimated revenues and the framework governing the management of municipal waste and the functioning of SWMOs. The precise parameters taken into account on a case by case basis to determine the compensation are described in detail in the report documenting the SGEI and the financial analysis accompanying the SGEI file and were subject to evaluation for inclusion of the operation in the OP 'Transport Infrastructure, Environment and Sustainable Development'.

These parameters are assessed with the utmost precision to minimise the risk of overcompensation of the provider, i.e. the risk that they receive compensation that exceeds the net cost including a reasonable profit. The level of reasonable profit is determined by the official price of the yield on Greek State securities at the time the compensation is granted, and with a duration matching that of the SGEI, i.e. the beginning and end and duration correspond to the beginning and end and duration of the entrustment act.

Explanation of the (typical) arrangements for avoiding and repaying (recovering) any overcompensation.

The relevant SGEI decisions and supporting documents (documentation reports) contain the following provisions:

MECHANISM FOR MONITORING OF OVERCOMPENSATION

The mechanism for monitoring overcompensation operates as follows:

Verified parameters for checking and reviewing overcompensation:

- SGEI provider
- Content and duration of the SGEI
- Geographical area of service
- Annual compensation for SGEI, i.e. revenue/expenses
- Activities other than SGEI

Verification procedure in the operating phase:

On an annual basis, the SGEI provider collects:

1. Details of the SGEI provider and remit
2. Served users/geographical area
3. Details of the Waste Producer's Annual Report entered in the Electronic Register of Waste under Joint Ministerial Decision No ο.κ.43942/4026/2016 (GG II 2992/2016), in particular:

- Type and amount of waste collected

4. Details of operation of the service

5. Reports of planned and exceptional interruptions of the SGEI

6. Charges and other revenues on the basis of weighing and invoices, in accordance with the revenue categories of the parameters for calculating and checking compensation and control of compensation included in the documentation report accompanying the SGEI entrustment decision.

7. Annual expenditure per category, in accordance with the revenue categories of the parameters for calculating and checking compensation and control of compensation included in the relevant documentation report accompanying the SGEI entrustment decision.

8. Any activities other than an approved SGEI

The competent verification body checks the above data every three years during the entrustment period, as well as at the end, and prepares reports containing at least the following information:

- Details of the SGEI provider and remit
- Served users/geographical area
- Report describing the SGEI
- Type and amount of waste
- Annual revenues (in accordance with the revenue categories of the parameters for calculating and checking compensation above), such as:
- Annual expenditure by category (in accordance with the revenue categories of the parameters for calculating and checking compensation above)
- Verification of the compensation calculation data and comparison with the SGEI entrustment decision
- Confirmation of compliance with a separate accounting system for SGEI
- Any activities other than an approved SGEI
- The applicable repayment procedure for any overcompensation received

MECHANISM FOR RECOVERY/CORRECTION OF OVERCOMPENSATION

The provider (municipality or SWMO) must draw up its annual budget, setting out the contributory fees (municipalities) or annual contributions (SWMOs) determined in accordance with the annual management cost; to calculate this the parameters for determining the compensation for the provision of the SGEI concerned are taken into account. Any resulting divergences are included in the calculation of the management cost for the following year. Therefore, in the event of overcompensation, the fees or annual contributions will be adjusted as appropriate.

A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above EUR 15 million to undertakings that also have activities outside the scope of the SGEI) are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).

The financing decisions are published on the following websites:

- Diavgeia (search using the appropriate code printed on the document – obligatory or not valid)
- Website of the Managing Authority of the OP 'Transport Infrastructure, Environment and Sustainable Development' (YMEPERAA) ymeperaa@mou.gr
- NSRF Website: espa@mneec.gr
- The beneficiary of the aid must, as a minimum, take the publicity measures provided for in Regulation (EU) No 1303/2013.

Amount of aid granted

Total amount of aid granted (in EUR millions). Includes all aid paid in your territory, including aid paid by regional and local authorities. (A+B+C)

No	MIS	2018 (EUR million)	2019 (EUR million)
1	5001154	1.358	1.401
2	5001123	0.543	2.700
3	5001144	0.000	1.430
4	5001681	0.051	0.224
5	5001777	0.000	2.717
6	5001255	0.000	1.035
7	5010474	3.300	0.100
8	5001837	0.000	0.062
9	5009847	0.000	8.031
10	5009884	0.793	0.191
11	5010484	4.681	0.153
12	5037435	0.000	1.203
13	5001473	0.000	0.513
	TOTAL	10.726	19.760

B. ORGANISATION: Ministry of Development and Investment, Managing Authority of the OP for the Region of Eastern Macedonia and Thrace

Clear and comprehensive description of how the respective services are organised in your Member State
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.
<p>Action: CONSTRUCTION OF A LANDFILL SITE FOR THE EASTERN SECTOR OF THE REGION OF EASTERN MACEDONIA AND THRACE (MIS 50110501)</p> <p>The service covers the landfilling of residues from the treatment of mixed municipal solid waste in the municipalities of the Regional Units of Evros and Rodopi. These quantities include residues resulting from the sorting of recyclable materials at the RMSCs in Alexandroupoli and Didymoteicho.</p> <p>The project is in the construction phase (06.2020); it is not yet in operation and has no revenue</p>
Explanation of the (typical) forms of entrustment . If standardised templates for entrustments are used for a certain sector, please attach them.
Entrustment was awarded by the Decision to include the action in the OP 'Transport Infrastructure, Environment and Sustainable Development', ref. 1565/18.05.2018.
Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.
The duration of the entrustment of the service provided is 11 years, including the time for the construction of the required infrastructure, in accordance with the financial study accompanying the project, which forms an integral part of the project file.
Explanation whether (typically) exclusive or special rights are assigned to the undertakings.
The service provider is the Public Limited Waste Management Company of Eastern Macedonia and Thrace, which was set up in 2003 (GG I 1797/3.3.2004) and operates as a regional Solid Waste Management Operator (SWMO) of the local authorities of the Region of Eastern Macedonia and Thrace under Law 4071/2012 with responsibility for the treatment of solid municipal waste in the area served.
Which aid instruments have been used (direct subsidies, guarantees, etc.)?
Direct subsidies
Typical compensation mechanism as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.

<p>The compensation granted by this Decision for the provision of the SGEI concerned relates exclusively to the cost of the required infrastructure up to the amount of the financing deficit resulting from the financial analysis. The construction of the required infrastructure will be carried out through an open competition procedure under Directive 2004/18/EC.</p>	
<p>Typical arrangements for avoiding and repaying any overcompensation.</p>	
<p>A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above EUR 15 million to undertakings that also have activities outside the scope of the SGEI are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).</p>	
<p>Amount of aid granted</p>	
<p>Total amount of aid granted (in EUR millions)⁶. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)</p>	
2018	2019
814 327.39	1 106 034.26
<p>A: Total amount of aid granted (in EUR millions) paid by national central authorities</p>	
2018	2019
<p>B: Total amount of aid granted (in EUR millions) paid by regional authorities</p>	
2018	2019
814 327.39	1 106 034.26
<p>C: Total amount of aid granted (in EUR millions) paid by local authorities</p>	
2018	2019
<p>Share of expenditure per aid instrument (direct subsidy, guarantees etc.) (if available)</p>	
2018	2019
<p>Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of the undertakings)</p>	
2018	2019

--

C. ORGANISATION: Ministry of Development and Investment, Managing Authority of the Regional OP for Attica

Clear and comprehensive description of how the respective services are organised in your Member State
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.
<p>The service covers the integrated management comprising recovery and disposal of municipal solid waste in a landfill to serve the municipality of Kythira on two islands (Kythira and Antikythira). The service comprises collection of the municipal waste to be treated (mixed municipal waste and a pre-sorted organic fraction of municipal waste), mechanical separation into individual streams and sorting of recoverable materials, anaerobic biological treatment of the organic fraction, and stabilisation and storage of the inactivated product (compost).</p> <p>For the SGEI provider properly to provide the service described on the Island of Kythira for an annual input of 2 256.20 tonnes of waste requires the construction of a solid waste treatment plant (composting plant) of pre-sorted organic and green waste, and a landfill site with a minimum useful capacity of 102 702 m³. The establishment of the necessary infrastructure includes improving the existing 2 043.62 m dirt access road, constructing a 846.25 m internal road and supplying the equipment for the solid waste treatment plant.</p> <p>For the SGEI provider properly to provide the service described on the island of Antikythira requires the construction and operation of a landfill site with a minimum useful capacity of 5 611 m³.</p> <p>Measure MIS 5003945 includes the rehabilitation of the two active uncontrolled waste disposal areas on Kythira and Antikythira, which is not financed from European funds.</p>
Explanation of the (typical) forms of entrustment . If standardised templates for entrustments are used for a certain sector, please attach them.
<p>The decision to entrust an SGEI comprises a number of regulatory and administrative acts, including:</p> <ul style="list-style-type: none"> • the legislative framework governing waste management • the approved Regional Waste Management Plan (RWMP) of the Region where the service is provided • the legislative framework for the establishment and operation of the SGEI provider • the financing decision of each operation <p>The Regional Waste Management Plan (RWMP) of each Region determines how municipal waste should be managed in each geographical unit (management unit) to achieve the objectives set, which have to comply with the national target and the relevant national and EU waste management legislation. The RWMP sets out the management tasks per waste stream in each area, the infrastructure necessary to carry out those tasks, and the bodies responsible for providing each service/task.</p> <p>Approval of the relevant RWMP for MIS 5003945:</p> <p>Decision No 414/2016 of the Regional Council of the Region of Central Greece approving the revised Regional Waste Management Plan for the Region of Attica, which was approved by Joint Ministerial Decision No ο.κ. 61490/5302/19.12.2016 (GG II 4175/2016).</p> <p>The Solid Waste Management Operators are entrusted with the management (temporary storage,</p>

transfer, recovery/treatment and final disposal) of municipal waste, in accordance with Article 7(2.a) of Joint Ministerial Decision 50910/2727/2003, Article 1 of Joint Ministerial Decision 2527/2009, Article 16 of Law 4071/2012, and Article 77 of Law 4257/2014. Joint Ministerial Decision No 2527/2009 sets out the pricing policy of the SWMOs for the services provided, which shows that their budget is balanced, therefore the Operators have no financial gain from the services provided. The SWMOs are obliged to continuously provide the service of municipal waste management in their member municipalities without discrimination.

The beneficiaries of the grants are those responsible by law for providing the relevant municipal solid waste management services (JMDs 50910/2727/16.12.2003 [GG II 1909] and No 4071/2012 [GG I 85/2012]), namely:

For MIS 5003945: The municipality of Kythira is the beneficiary for the completion of the infrastructure and, until an SWMO is established, is the body that provides the SGEI.

Average duration of the entrustment (in years) and the proportion of entrustments that are **longer than 10 years** (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.

The provision of the service requires significant investment and therefore the duration of the SGEI is set at 25 years. This is a reasonable period of time to recover that investment in accordance with generally accepted accounting principles. As explained below, the parameters for calculating the compensation are clearly and objectively defined, and the annual compensation does not exceed EUR 15 million. To ensure that the compensation to be paid does not exceed the actual costs, a mechanism for verification and control, and correction in the event of overcompensation, is described. Finally, for the construction of the infrastructure and provision of the necessary equipment for the SGEI, and also for implementation of all the necessary supporting actions, an open procedure is followed, which ensures that public contracts are awarded following competitive procedures ensuring the greatest possible participation of candidate economic operators and, hence, the development of greater competition and, finally, the least cost for the community as a whole.

Explanation whether (typically) **exclusive or special rights** are assigned to the undertakings.

No exclusive or special rights have been assigned to the recipients of the grant beyond what is already provided for by the applicable framework governing their responsibilities.

Which **aid instruments** have been used (direct subsidies, guarantees, etc.)?

Direct grant from the NSRF 2014-2020 (Priority Axis 'Improving Quality of Life in the Urban Environment' of the OP 'Attica 2014-2020') with ERDF funding.

Typical **compensation mechanism** as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.

The framework governing the operation of the financial instrument, the operation of the waste management service providers (SWMO and municipalities) and the award and management of public contracts require application of the methodology based on cost allocation to calculate the amount of the grant.

The level of public financing is determined by means of a financial analysis to determine the

compensation in accordance with the law on SGEIs, which includes the cost of the required infrastructure up to the amount of the financing deficit resulting from the financial analysis.

For each individual case, the compensation paid for the services provided is limited to what is necessary to cover all or part of the costs incurred in meeting the obligation to provide the specified SGEI, taking into account the estimated revenues and the framework governing the management of municipal waste and the functioning of SWMOs.

The precise parameters taken into account on a case by case basis to determine the compensation are described in detail in the report documenting the SGEI and the financial analysis accompanying the SGEI file and were subject to evaluation for inclusion of the operation in the OP 'Attica 2014-2020'.

These parameters are assessed with the utmost precision to minimise the risk of overcompensation of the provider, i.e. the risk that they receive compensation that exceeds the net cost including a reasonable profit. If the financial analysis accompanying the project provides for a profit percentage, this will be considered reasonable if it does not exceed the relevant swap rate plus 100 basis points. The relevant swap rate is the swap rate whose maturity and currency correspond to the duration and currency of the entrustment act.

Typical arrangements for avoiding and repaying any overcompensation.

Under Annex II 'SPECIFIC SGEI CONDITIONS' of the relevant financing decisions in force:

If the parameters used to determine the compensation granted for the service provided are altered during the period of entrustment of the SGEI and lead to overcompensation, corrective measures are taken as defined in Article 5 of JMD 2527/2009, which is part of the SGEI entrustment decision.

The Greek authorities carry out regular audits every three years during the entrustment period, and at the end, to check the compensation, and must ask the SGEI provider to pay back any overcompensation received. Where the amount of overcompensation does not exceed 10% of the amount of the average annual compensation, such overcompensation may be carried forward to the next period and deducted from the amount of compensation payable in respect of that period.

The competent verification body reviews the SGEI data every three years during the entrustment period, and at the end, and prepares reports (based on Decision 2012/21/EU) containing at least the following information:

- Details of the SGEI provider and remit
- Served users/geographical area
- A report describing the SGEI, the operation of infrastructure, and containing references to periods of efficient operation, failures, maintenance, etc.
- Type and amount of waste for treatment and/or disposal
- Type and quantities of products and residues
- Charges and other income (in accordance with the categories of costs of the compensation calculation and control parameters mentioned above) (entry fees and selling prices for products)
- Annual expenditure by category (in accordance with the revenue categories of the parameters for calculating and checking compensation above)
- Verification of the compensation calculation data and comparison with the SGEI entrustment decision
- Confirmation of compliance with a separate accounting system for provision of the entrusted

<p>SGEI</p> <ul style="list-style-type: none"> Any extensions of SGEI provision Any activities other than an approved SGEI The applicable repayment procedure for any overcompensation received. <p>In any case, in the event of overcompensation, the municipal waste management fees (contribution) are adjusted in accordance with the procedure described in Article 5 of JMD 2527/2009.</p>	
<p>A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above EUR 15 million to undertakings that also have activities outside the scope of the SGEI are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).</p>	
<p>Not applicable.</p>	
<p>Amount of aid granted</p>	
<p>Total amount of aid granted (in EUR millions)⁶. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)</p>	
2018	2019
0.636	0.868
<p>A: Total amount of aid granted (in EUR millions) paid by national central authorities</p>	
2018	2019
<p>B: Total amount of aid granted (in EUR millions) paid by regional authorities</p>	
2018	2019
<p>C: Total amount of aid granted (in EUR millions) paid by local authorities</p>	
2018	2019
<p>Share of expenditure per aid instrument (direct subsidy, guarantees etc.) (if available)</p>	
2018	2019
<p>Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of the undertakings)</p>	
2018	2019

D. ORGANISATION: Ministry of Development and Investment, Managing Authority of the OP for the Region of Epirus

Clear and comprehensive description of how the respective services are organised in your Member State.
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.
<p>In the region of Epirus, an integrated municipal solid waste management operation is financed by the OP 'Transport Infrastructure, Environment and Sustainable Development'.</p> <p>The services provided under the operation 'Network of Waste Transfer Stations of the Region of Epirus (Phase 1)' (MIS 5003839) cover all the work required to transfer the mixed MSW of the served municipalities for the purpose of transport to the next stage of integrated MSW management, which is treatment.</p> <p>This involves creating the necessary infrastructure/facilities and supplying the equipment necessary for the operation of eight transfer stations with a total capacity of approximately 530 t/d (Ioannina, Zitsa, Pogoni, Metsovo, Arta, G. Karaiskakis, Igoumenitsa and Preveza).</p> <p>The transfer procedure can be summarised as follows: The refuse collection truck arrives at the entrance to the waste transfer station; the load is weighed, registered, checked and discharged into the hopper; the waste is compacted; the empty container is filled; the detachable container is released and lifted onto the truck by the hook lift system; the filled container is transported either to a WTP for treatment or to landfill.</p>
Explanation of the (typical) forms of entrustment . If standardised templates for entrustments are used for a certain sector, please attach them.
<p>The beneficiary of the grant is the Region of Epirus under the Programming Agreement of 24 November 2015 with the four Solid Waste Management Operators (SWMOs) in the Region of Epirus, which are the local government bodies responsible for specifying the details of and implementing the objectives and actions of the Regional Solid Waste Management Plans (JMDs 50910/2727/16.12.2003 (GG II 1909/2003) and 4071/2012 (GG I 85/2012)).</p> <p>The ultimate provider of the SGEI will be the SWMO of Law 4555/2018 in the Region of Epirus, resulting from the merger of the pre-existing ones (in accordance with Decision No 121461/28.8.2019 of the Coordinator of the Decentralised Administration of Epirus and Western Macedonia [GG II 3456/13.9.2019] on the establishment of a recommendation, and Decision No 7066/20.1.2020 of the Coordinator of the Decentralised Administration of Epirus and West Macedonia on the merger and transfer of movable and immovable property [GG II 82/24.1.2020]).</p>
Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.
The duration of the entrustment of the service entrusted to the SGEI provider is 25 years, taking into account the relevant regulatory framework for defining the SGEI, Commission Implementing Regulation 480/2014 (which stipulates that for waste management projects this period ranges from 25 to 30 years), and the fact that more than 10 years will be required to recover the significant investment involved.

Explanation whether (typically) exclusive or special rights are assigned to the undertakings.
No exclusive or special rights have been assigned to the recipients of the grant beyond what is already provided for by the applicable framework governing their responsibilities.
Which aid instruments have been used (direct subsidies, grants, guarantees, etc.)?
Direct grant from the Cohesion Fund.
Typical compensation mechanism as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.
The cost allocation methodology was applied.
Typical arrangements for avoiding and repaying any overcompensation .
<p>As stated in the report documenting provision of the SGEI, in accordance with Article 5 of JMD 2527/2009, by the end of September each year the Management Board of the SWMO determines the annual contribution of each municipality participating in the SWMO ('member-municipality') for the following year, depending on the quantities of waste expected.</p> <p>The annual contribution is determined in accordance with the annual management costs; to calculate this the parameters for determining the compensation are taken into account.</p> <p>Under Article 5 of JMD 2527/2009, the management costs are re-determined the following year using the actual data of the previous year.</p> <p>Any resulting divergences are included in the calculation of the management cost for the following year, and are determined as follows:</p> <p>Annual management cost (re-determined) – Annual management cost (budgeted) = Divergences for the year.</p> <p>It is therefore clear that, in the event of overcompensation, the SWMO has the possibility of a correction via an adjustment of the MSW management fee (contribution).</p>
<p>A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above EUR 15 million to undertakings that also have activities outside the scope of the SGEI are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).</p>
The provider will receive aid below EUR 15 million (EUR 9 943 422.35) and under inclusion decision No 1049/11.7.17 (6E307A9-028), as amended and in force, is committed to carry out all the actions defined by the Management and Control System and the applicable framework for the 2014-2020 programming period.

Amount of aid granted	
Total amount of aid granted (in EUR millions). Includes all aid paid in your territory, including aid paid by regional and local authorities. (A+B+C)	
2018	2019
3 315 809.55	3 262 583.77
A: Total amount of aid granted (in EUR millions) paid by national central authorities	
2018	2019
B: Total amount of aid granted (in EUR millions) paid by regional authorities	
2018	2019
3.316	3.263
C: Total amount of aid granted (in EUR millions) paid by local authorities	
2018	2019
Share of expenditure per aid instrument (direct subsidy, guarantees etc.) (if available)	
2018	2019
Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of the undertakings)	
2018	2019

E. ORGANISATION: Ministry of Development and Investment, Managing Authority of the OP for the Region of Central Macedonia

Clear and comprehensive description of how the respective services are organised in your Member State.
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.
<p>Waste Transfer Station of the Northwest Thessaloniki Urban Agglomeration – Phase 2</p> <p>Transfer of the MSW of the local authorities of the NW area of the Regional Unit of Thessaloniki, to be sent for final disposal to the existing landfill at Mavrorachi.</p>
<p>Waterproofing of cells 3 and 4 of the landfill of the North-West Unit of the Prefecture of Thessaloniki – Phase 2</p> <p>Landfilling of the mixed MSW of the municipalities in the Regional Unit of Thessaloniki</p>
<p>Extension of the existing Waste Transfer Station of the municipality of Thessaloniki, with procurement of equipment to increase its capacity and works to upgrade the site – Phase 2</p> <p>Transfer of the MSW of the local authorities of the NE area of the Urban Agglomeration of Thessaloniki, to be sent for final disposal to the existing landfill at Mavrorachi.</p>
<p>Extension of the landfill site of the 1st Administrative Unit of the Prefecture of Pella (Almopia landfill site) and modernisation of the existing sewage treatment plant – Phase 2</p> <p>Landfilling of mixed MSW of the municipality of Almopia.</p>
<p>Waste/Residue Landfill of the 4th Administrative Unit of Chalkidiki – Phase 2</p> <p>Landfilling of mixed MSW of the municipality of Aristoteli.</p>
Explanation of the (typical) forms of entrustment. If standardised templates for entrustments are used for a certain sector, please attach them.
<p>The decision to award the SGEI consists of the decision to grant financing, supported by the relevant documents demonstrating compliance with Decision 2012/21/EU and the parameters for determining compensation, and the calculation of the compensation, in particular through</p> <ul style="list-style-type: none"> • the report documenting the SGEI • the financial breakdown of the determination of compensation and supporting regulatory and administrative acts such as: • the legislative framework governing waste management • the approved Regional Waste Management Plan (RWMP) of the relevant Region where the service is provided • the legislative framework for the establishment and operation of the SGEI provider concerned • the legislative framework of public procurement • the management and control system (MCS) of the NSRF 2014-2020

Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.	
SERVICE	DURATION OF ENTRUSTMENT OF SGEI
Waste Transfer Station of the Northwest Thessaloniki Urban Agglomeration – Phase 2	29
Waterproofing of cells 3 and 4 of the landfill of the North-West Unit of the Prefecture of Thessaloniki – Phase 2	7
Extension of the existing Waste Transfer Station of the municipality of Thessaloniki, with procurement of equipment to increase its capacity and works to upgrade the site – Phase 2	3
Extension of the landfill site of the 1st Administrative Unit of the Prefecture of Pella (Almopia landfill site) and modernisation of the existing sewage treatment plant – Phase 2	13
Waste/Residue Landfill of the 4th Administrative Unit of Chalkidiki – Phase 2	26
Explanation whether (typically) exclusive or special rights are assigned to the undertakings.	
No exclusive or special rights have been assigned to the recipients of the grant beyond what is already provided for by the applicable framework governing their responsibilities.	
Which aid instruments have been used (direct subsidies, grants, guarantees, etc.)?	
Explanation of the (typical) compensation mechanism as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.	
Explanation of the (typical) arrangements for avoiding and repaying (recovering) any overcompensation.	

For this SGEI, the mechanism for monitoring overcompensation operates as follows:

Verified parameters for checking and reviewing overcompensation:

- SGEI provider
- Content and duration of the SGEI
- Geographical area of service
- Annual compensation for SGEI, i.e. revenue/expenses
- Activities other than SGEI

Verification procedure in the operating phase:

On an annual basis, the SGEI provider collects the following information and sends it to the verification body, with a copy to the Special Management Service, by 31 March of the following year:

1. Details of the SGEI provider and framework of responsibilities
2. Served users/geographical area
3. Details of the Waste Producer's Annual Report entered in the Electronic Register of Waste referred to in Joint Ministerial Decision No οικ.43942/4026/2016 (GG II 2992/2016), in particular:
 - Type and amount of waste collected
4. Details of operation of the service
5. Reports of planned and exceptional interruptions of the SGEI
6. Charges and other revenues on the basis of weighing and invoices (in accordance with the revenue categories of the parameters for calculating and checking compensation above), such as:
 - Contracts for the disposal/sale of materials
 - Subsidies from Alternative Management Systems
 - Landfill charge
7. annual expenditure by category (in accordance with the expenditure categories of the parameters for calculating and checking compensation above), such as:
 - Working time and salaries of Green Point staff
 - Fuel consumption
 - Cost of regular maintenance of Green Point
 - Cost of public utilities, fuel, consumables
8. Any activities other than an approved SGEI

Note that the projected revenues from the subsidy of the relevant Alternative Management Systems will be verified as part of a control to avoid overcompensation under the contract between the SGEI provider and the relevant Alternative Management System, and where the contract (a) has not entered into force and (b) does not have a duration which covers the duration of the SGEI.

The costs for each category of expenditure will also be verified as part of a control to avoid overcompensation. The costs for each individual category of investment expenditure for the provision of the SGEI must be verified after the competitive procedure for procuring the equipment or service to be implemented by the SGEI provider and the compensation is adjusted to the finalised costs.

The competent verification body reviews the above information every three years during the entrustment period, and at the end, and prepares reports (based on Decision 2012/21/EU)

containing at least the following information:

- Details of the SGEI provider and framework of responsibilities
- Served users/geographical area
- Report describing the SGEI
- Type and amount of waste
- Annual revenues (in accordance with the revenue categories of the parameters for calculating and checking compensation above), such as:
- Annual expenditure by category (in accordance with the revenue categories of the parameters for calculating and checking compensation above)
- Verification of the compensation calculation data and comparison with the SGEI entrustment decision
- Confirmation of compliance with a separate accounting system for SGEI
- Any activities other than an approved SGEI
- The applicable repayment procedure for any overcompensation received

The costs for each category of investment expenditure for provision of the SGEI will be verified after the competitive procedure for procuring the work, supply or service concerned, and the compensation will be adjusted to the finalised costs as part of a control to avoid overcompensation.

On finalisation of the form and the setting up of the verification body, the annex to the inclusion decision concerning the report documenting the SGEI is completed accordingly.

The municipality must draw up its annual budget each year, setting out the fees for refuse collection, which are determined in accordance with the annual management cost; to calculate this the parameters for determining the compensation are taken into account. Any resulting divergences are included in the calculation of the management cost of the year following the reporting year, and are determined as follows:

It is therefore clear that, in the event of overcompensation, the fees will be adjusted.

Since the fees charged by the municipality of Pella for the services provided to date are not in surplus to generate a reserve, it is not possible to finance the present SGEI which is a set of new, more integrated urban waste management services to its citizens.

A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above 15 million euro to undertakings that also have activities outside the scope of the SGEI) are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).

Amount of aid granted

Total amount of aid granted (in EUR millions). Includes all aid paid in your territory, including aid paid by regional and local authorities. (A+B+C)

No	2018 (EUR million)	2019 (EUR million)
4	4 591 818.11	4 622 258.10
5	1 474 106.85	1 474 106.85
6	1 562 809.83	1 562 809.83
7	3 073 755.82	3 104 983.09
8	522 765.31	4 681 096.59
TOTAL	11 225 255.92	15 445 254.46

APPLICABILITY OF THE 2012 SGEI FRAMEWORK

1. POSTAL SERVICES – ELTA

The Greek authorities submitted notification ref. SA.35608(2014/N)/20.6.2014 concerning the financing of the universal postal service in accordance with the provisions of the SGEI Framework 2012. However, the EU assessment was made on the basis of the SGEI Decision (EU Decision SA.35608 (2014/C) (ex 2014/N) – Hellenic Post (ELTA) – Compensation fund for the financing of the universal postal service).

Clear and comprehensive description of how the respective services are organised in your Member State.

Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the **contents of the services entrusted as SGEI** as clearly as possible.

Under Law 4053/2012, ELTA will remain the universal service provider until 31 December 2028. The content of the universal service obligation is laid down in Article 6 of the above law and Ministerial Decision oik.7728/190/2013 (GG II 478) as follows:

The universal service includes at least the following individual services:

(a) collection, transport, sorting and distribution of postal items weighing up to 2 kg, including but not limited to items of correspondence and books, catalogues, newspapers, periodicals, etc., and addressed direct mail;

b) collection, transport, sorting and distribution of postal packages weighing up to 20 kg;

c) services for registered items and insured items.

In addition to postal SGEI services, non-postal SGEI services are also provided.

Article 8(5) of Law 4053/2012 provides that the provision of additional services beyond the universal service obligations, such as the distribution of pensions and money orders, is not subject to compensation mechanisms that require the contribution of postal service providers, but may be financed in accordance with the rules of EU State aid law.

Article 4(2) of the entrustment contract in force since 19 April 2015 between ELTA and the Hellenic Republic provides that the ELTA network across the country and particularly in rural areas is recognised as an important contributing factor to the social and economic development of those areas. ELTA makes every effort to maintain the level of the network's presence throughout the term of the contract. Directive 2008/6/EC on the full accomplishment of the internal market of Community postal services directly establishes the right of the universal service provider to compensation for the costs associated with the provision of such service.

These services are provided in remote or sparsely populated areas (mainland and islands) where, because of their geographic circumstances, there is no easy access to or presence of State agencies or other organisations, banks, etc., and where ELTA contributes decisively with its network to the day-to-day service of the residents by providing the following services:

1. Payment of all the tax liabilities of the residents of the above areas to the State and their contributions to organisations;
2. Payment of pensions (by agreement with the beneficiary) on behalf of the Greek State in areas of the country where there is no credit institution;
3. Payment of bills to organisations (PPC, OTE, alternative power and telephony providers, local authorities, local water authorities, etc.);

4. Handling of press products, subsidised by the Secretariat-General for Communications throughout the country;
5. Connection of the Automatic Teller Machine terminals network to corresponding interbank and other computer systems throughout the country;
6. Implementation of the postal cheques service at national and international level, in accordance with the contracts signed by Greece within the framework of the Universal Postal Union (UPU), a service of particular importance for those living in remote areas, without a banking service, as well as for those with limited mobility;

These services cover the whole country, with a single tariff.

The provision of non-postal SGEI by ELTA is based on the following criteria:

- Their nature as services offered to citizens by the State or State organisations through the extensive postal network;
- The extent to which these services are offered throughout the whole country, mainly at the premises of the recipients, which is of major importance for rural and island regions;
- No other State or private agency can offer such services;
- They are offered with a single tariff, regardless of the cost-efficiency of the services offered in different regions, especially the remote ones.

Such services – payment of pensions, social benefits, payment of bills, etc. – are considered as services undertaken by ELTA on behalf of the Greek State, public organisations, local authorities, etc. These services, especially in remote and inaccessible areas, are services of general economic interest, as defined by national and EU law. Therefore, services to citizens, as mentioned in the proposed actions, are SGEIs according to the above criteria.

Explanation of the (typical) forms of entrustment. If standardised templates for entrustments are used for a certain sector, please attach them.

Article 4(b) 'Competences of the Ministry of Infrastructure, Transport and Networks' (as in force in conjunction with Article 4(3) of Presidential Decree 123/2016 and Article 1(3) of Presidential Decree 81/2019), Article 7 'Provision of universal service', Article 21 'Transitional provisions' of Law 4053/2012 (GG II 44/7.3.2010) provide inter alia that:

- ELTA will remain the universal service provider until 31 December 2028.
- The terms and conditions for the provision of the universal service, the penalties for non-compliance with those terms and conditions, and the maximum flat-rate compensation for users in the event of failure to provide services are laid down in a contract concluded between the universal service provider and the Minister for Digital Governance.

The entrustment contract for the provision of a universal postal service between the Greek State and ELTA was signed on 19 April 2017 and has been in force since 19 April 2015.

Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.

ELTA will remain the universal service provider until 31 December 2028, in accordance with Law 4053/2012.

The validity of the above entrustment contract is six years and expires on 18 April 2021.

Explanation whether (typically) **exclusive or special rights** are assigned to the undertakings.

Since 1 January 2013, ELTA operates in a fully liberalised postal market pursuant to Law 4053/2012, in accordance with the 3rd EU Directive on postal services. ELTA enjoyed the benefit of exclusivity (reserved area) until 31 December 2012, which concerned its specific right of being the sole provider of mail-handling services for items weighing less than 50 g, as a compensation for providing a universal service.

Under Article 7(4) of Law 4053/2012 and the entrustment contract, the universal service provider (ELTA A.E.O.) is granted the exclusive right to issue stamps and provide associated philatelic business.

Which aid instruments have been used (direct subsidies, grants, guarantees, etc.)?

For the period 2018-2019 under consideration, direct State aid has been paid to ELTA for the provision of the universal postal service for the years 2013-2019.

Explanation of the (typical) **compensation mechanism** as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.

In full compliance with the provisions of Law 4053/2012 (Annex I, Part B) and Regulatory Decision No 697/129/2013 of the Hellenic Telecommunications and Post Commission (EETT) (GG 2016/16.8.2013) concerning calculation of the net cost of the universal postal service, the calculation methodology is based on the following:

The net cost of the universal postal service obligations is calculated as the difference between the net operating cost of the universal postal service provider with universal postal service obligations and the operating cost of the same postal service provider without the universal service obligations.

The calculation takes into account all other relevant elements, including any intangible and market benefits which accrue to a postal service provider entrusted to provide a universal service, entitlement to a reasonable profit and cost efficiency incentives.

The calculation of the net cost of specific aspects of the universal postal service obligations is made separately so as to avoid the double counting of any direct or indirect benefits and costs.

The overall net cost of the universal postal service obligations to any designated universal postal service provider is calculated as the sum of the net costs arising from the individual components of the universal postal service obligations, taking account of any intangible benefits. The responsibility for verifying the net cost lies with the Hellenic Telecommunications and Post Commission (EETT).

To verify the net cost for the period 2013-2019, EETT has used the Net Avoided Cost (NAC) methodology.

As regards the compensation mechanism for financing the universal service, Law 4053/2012 (Article 8), as amended and currently in force, provides that:

1. The net cost of providing the universal service is borne by the universal service provider in so far as it concerns the provision of postal services as part of the universal service, postal service providers as part of the universal service and the State budget.

2. The part of the net cost for providing the universal service that is charged to the State budget is set by joint decision of the Minister for Finance and the Minister for Infrastructure, Transport and Networks (now Digital Governance under Article 1(3) of Presidential Decree 81/2019). Following a recommendation by EETT, the same decision lays down the method and procedure for allocating the part of the net cost borne by the postal service providers and the penalties imposed on them in the event of non-compliance. The cost allocation is transparent, objective and neutral in order to avoid the risk of double payment of contributions falling on both outputs and inputs of the postal operators, taking into account, inter alia, the geographical distribution of the postal service provided by each operator and the corresponding revenue.

3. EETT is responsible for calculating and customising the contributions referred to in this Article for each postal service provider. EETT is also be responsible for collecting the amounts involved and passing them on to the beneficiary universal service provider, except for the contributions to be charged to the beneficiary in accordance with paragraph 1 of this Article, which the beneficiary may offset.

4. The part of the net cost for providing the universal service that is charged to the State budget in accordance with paragraph 2 of this Article is passed on directly to the beneficiary universal service provider.

5. The provision of additional services beyond the universal service obligations, such as the distribution of pensions and money orders, is not subject to compensation mechanisms that require the contribution of postal service providers, but may be financed in accordance with the rules of EU State aid law.

6. A transitional phase shall be set to compensate for the universal service for the years 2013 to 2020. For the transitional phase, the Universal Service Provider (USP) submits to EETT the calculation of the

net cost of universal service provision for the years 2013, 2014 and 2015 by 30 June 2017 2016 2017, 2018, 2019 and 2020 (sic). EETT then checks the submitted data and checks, in accordance with the provisions in force, the net cost of providing the universal postal service in the above years, if any such cost exists. From the net cost of providing the universal postal service, as verified by EETT, for the years 2013 to 2020, the State budget covers up to EUR 15 million per year as a Service of General Economic Interest (SGEI).

The amount referred to in the previous sentence may be made available to the USP before final verification by EETT of the net cost of the universal postal service for the years 2017 and 2018, if the Authority considers the relevant costs to be clearly more than EUR 15 million.

For the year 2019 the above amount may be made available to the USP before verification by EETT of the net cost of the provision of the universal postal service for that year, if the Authority expects, on the basis of the cost accounting elements of the universal postal service during the first quarter of 2019, together with the verified annual net cost of providing the universal postal service for the years 2013 to 2017, that for the year 2019 the costs will exceed EUR 15 million.

The amount is allocated directly to the beneficiary USP.

The time and manner of allocation, the necessary supporting documents, and all necessary details are defined by joint decision of the Minister for Finance and the Minister for Digital Policy, Telecommunications and Media (now Digital Governance, pursuant to Article 1(3) of Presidential Decree 81/2019).

Annex I to Law 4053/2012, as in force, provides that:

The net cost of a universal service is an 'unfair financial burden' when it exceeds 1% of the revenues of the USP from the provision of universal services. If the EETT finds that the verified net cost is an unfair financial burden for the USP, this cost is compensated in full. For the period 2013-2017, if the EETT finds that the verified net cost constitutes an unfair financial burden for the USP, this cost is compensated up to a maximum of EUR 15 million per year. If the EETT finds that the verified net cost does not constitute an unfair financial burden, it is borne solely by the USP.

Explanation of the (typical) arrangements for avoiding and repaying (recovering) any overcompensation.

The arrangements for avoiding overcompensation are set out in the EETT's Regulatory Decision No 697/129/2013 (GG 2016, 16.8.2013) (Article 4(1)), defining the general principles for calculating the net cost of universal service obligation, according to which:

The calculation of the net cost of the universal service shall take into account the benefits, including intangible and market benefits to the postal service provider designated to provide a universal postal service, the entitlement to a reasonable profit and incentives for cost efficiency.

Moreover, pursuant to the above Regulatory Decision (Article 8(6)) concerning the verification of the net cost calculation:

When verifying the net cost, due attention is to be given to correctly assessing the costs that any designated universal service provider would have chosen to avoid, had there been no universal service obligation. The EETT will take into account the efficiency of the USP so that any inefficiency on the part of the USP will not affect the net cost result. The approved net cost must not exceed what is necessary to cover all or part of the costs incurred in the discharge of public service obligations, taking into account the relevant revenues and a reasonable profit for discharging those obligations.

A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above 15 million euro to undertakings that also have activities outside the scope of the SGEI) are being complied with.

No aid of more than EUR 15 million/year has been granted in the years 2018 and 2019.

Amount of aid granted

Total amount of aid granted. This includes all aid paid in your territory, including aid paid by regional and local authorities **for the years 2018 and 2019.**

According to the Official Journal of the European Union (OJ C 348, 3.10.2014), the Commission decided not to raise objections to the provision of compensation to ELTA in the form of direct subsidies from the State budget for the provision of the universal service during the transitional arrangements 2013-2014 or 2013-2015.

In **2018**, ELTA received compensation of EUR 60 million for the period in question (2013, 2014, 2015 and 2016) and in **2019** EUR 45 million (2017, 2018 and 2019) pursuant to Article 8 of Law 4053/2012, as amended by Article 14(1) of Law 4463/2017, Article 39(1) of Law 4487/2017, Article 49 (1) of Law 4569/2018, Article 71 of Law 4587/2018 and Article 59 of Law 4607/2019.

2018	2019
EUR 60 million (concerns 2013-2016, 15 m/year)	EUR 45 million (concerns 2017-2019, 15 m/year)
Share of expenditure per aid instrument (direct subsidy, guarantees, etc.) (if available)	
2018	2019
EUR 60 million (concerns 2013-2016, 15 m/year)	EUR 45 million (concerns 2017-2019, 15 m/year)
Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of undertakings)	

2. ENERGY

OBLIGATIONS TO PROVIDE SERVICES OF GENERAL INTEREST

‘Single pricing of electricity in the Interconnected System and Non-Interconnected Islands (‘NII’)(SA 32060)’ - Description of the implementation of the 2012 SGEI Framework

This is an SGEI compensation which exceeds the EUR 15 million threshold and is therefore not covered by the SGEI Decision. This State aid (SA 32060) was approved by the Commission in its Decision C 2014/6436 final/16.9.2014, considered as State aid compatible with the internal market pursuant to Article 106(2) TFEU for the duration of the derogation from market opening granted by Commission Decision C(2014) 5902 of 14 August 2014 (‘the Derogation Decision’).

Concise background:

Ministerial Decision Δ5/ΗΛ/Β/Φ1Β/12924/13.06.2007 (GG II 1040/2007), adopted pursuant to Article 28 of Law 3426/2005, established Services of General Interest (SGI), and defined as an SGI the supply of electricity to consumers in non-interconnected islands and micro isolated systems, with tariffs identical to those of the Interconnected System.

Ministerial Decision Δ5/ΗΛ/Β/Φ1/οικ.27547/2.12.2011 (GG II 2783/02.12.2011), adopted pursuant to Article 55(3) of Law 4001/2011, established that the SGI are provided by all electricity suppliers.

Article 56(2) of Law 4001/2011 provides that the methodology for calculating the costs and the compensation due for meeting the public service obligations laid down in Articles 55, 56 and 57 of the same Law is determined by decision of the Regulatory Authority for Energy (RAE) (RAE Decision 14/2014 (GG II 270/2014) on the methodology for calculating the compensation to cover the costs of providing services of general interest (SGI) on the Non-Interconnected Islands (NII)).

Law 4067/2012 (Article 36(1) and (3) established the unit charges for electricity users for 2012 onwards and the prices for the years 2009 to 2011. Under Article 36(2) of Law 4067/2012, the persons liable to pay the SGI compensation are the individual users of each electricity supply, through the electricity supply tariffs, while the SGI compensation is paid by the suppliers into a special account kept by the Independent Power Transmission Operator ADMIE SA.

Article 55 of Law 4508/2017 (GG I 200) amended the provisions of Law 4067/2012 (GG I 79) and set the unit charges due in exchange for Services of General Interest (SGI compensation) from 1 January 2018. It also specified that if energy consumption over a four-month period exceeds the consumption limits of a particular scale in the domestic use (Low Voltage – LV) categories, only the excess consumption is charged on the basis of the charges applicable to the next scale in the series. Moreover, it was established that the users of each electricity supply, as well as self-procuring customers, are liable to pay the SGI compensation. Finally, pursuant to Article 57, it was established that as of 1 January 2018, the Hellenic Electricity Distribution Network Operator (DEDDIE) would replace ADMIE in the administration of the SGI special account referred to in Article 55(8) of Law 4001/2011 and become its sole administrator in Greece.

Article 15 of Law 4643/2019 (GG I 193/2019) further amended the provisions of Law 4067/2012, in particular by reducing the unit charges (in EUR/MWh) of the compensation for the provision of

services of general interest (SGI) relating to the second and third scale of the consumer category 'Domestic Use (LV) (night consumption)'.

RAE Decision No 329/2020 (GG II 888/2020) set the adjustment of the limit on the annual charge to electricity customers to cover the costs of providing services of general interest (SGI) in 2020, in accordance with Article 55(7) of Law 4001/2011.

By its Decision 2014/536/EU, following Greece's initial request of 5 December 2003 for a derogation from application of certain provisions of Directive 2003/54/EC and the renewal of this request on 17 January 2012 for a derogation from Chapters III and VIII of Directive 2009/72/EC for the non-interconnected islands (NII), as also referred to in the text of that Decision, the Commission granted Greece a derogation from certain provisions of Directive 2009/72/EC of the European Parliament and of the Council. Article 1 grants a derogation up to and including 17 February 2019 from market opening (Article 33 of Directive 2009/72/EC) and Article 5 gives retroactive effect to the decision granting the derogation, from 5 December 2003.

Article 24 of Law 4414/2016 (GG I 149) incorporated the necessary provisions of Law 4001/2011 in order to apply Decision 2014/536/EU to isolated micro-networks. It provided in particular that *'without prejudice to Article 137A, for the duration of validity of the derogation on the basis of the provisions of Article 33 of Directive 2009/72/EC, and pursuant to the terms of Commission Decision 2014/536/EU, a licence shall be granted exclusively to DEI AE for the supply to consumers on micro isolated systems and small isolated systems.'*

In accordance with European Commission Decision C 2014/6436 final/16.09.2014 (paragraphs 210-211), the measure to pay compensation for providing the SGI for the supply of electricity to the non-interconnected islands at the same prices as the interconnected system meets the requirements of the 2012 SGEI Framework and is therefore compatible with the internal market pursuant to Article 106(2) TFEU, provided that the above decision covers only the duration of the derogation granted by European Commission Decision No 2014/536/EU ('Derogation Decision'), i.e. up to 17 February 2019 at the latest. Also, under the above decision, '[I]f the measure is maintained beyond this point in time, the Commission invites the Hellenic Republic to notify the (adopted) measure upon the expiry of the derogation from market opening granted by the Derogation Decision.' Finally, in accordance with the above, we are in the process of drafting a text for a new notification to the European Commission.

Clear and comprehensive description of how the respective services are organised in your Member State.
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.
<p>'Uniform charging of electricity to consumers in the Interconnected System and the Non-Interconnected Islands'</p> <p>The relevant service of general interest ('SGI_NII') was defined pursuant to Decision No ΠΔ5/ΗΛ/Β/Φ1Β/12924 of the Minister for Development (GG II 140/25.06.2007), as a requirement for the suppliers operating on the NII to supply electricity to consumers from the NII and Isolated Micro Networks at the same tariffs, per consumer category, to those of the Interconnected System.</p> <p>This SGI, as a particular form of price regulation, aims to address the very specific geographic and</p>

<p>economic situation of the NII.</p> <p>In its decision on State aid case SA 32060, the Commission considered that the present SGI represents a genuine and properly defined service of general economic interest, in accordance with Article 106(2) of the Treaty (see paragraphs 136-144).</p>
<p>Explanation of the (typical) forms of entrustment. If standardised templates for entrustments are used for a certain sector, please attach them.</p>
<p>By Law: The public service obligation was explicitly introduced for the first time into Greek law by Article 28 of Law 3426/2005, which gave the Minister for Development the power to designate services of general interest. Under delegated powers, by Decision No ΠΔ5/ΗΛ/Β/Φ1Β/12924 of the Minister for Development, the supply of electricity to NII consumers at tariffs applied by consumer category to consumers of the interconnected network was defined as a service of general interest.</p> <p>Furthermore, Article 25 of Law 2773/1999 (as amended by Article 16 of Law 3426/2005) provided that from 1 July 2007, 'all consumers are designated as eligible customers', but introduced an exemption for NII consumers, provided that a derogation from Directive 2003/54/EC could be obtained (now Article 33 of Directive 2009/72).</p> <p>That derogation was granted to the Hellenic Republic by the European Commission under its Decision C(2014) 5902 (2014/536/EC), with retroactive effect from 5 December 2003.</p> <p>Under Article 137A of Law 4001/2011, the island of Crete does not qualify for the derogation for supply, while the island of Rhodes was excluded from this derogation from 1 January 2017, and as a result other energy suppliers in addition to PPC are now also operating on these islands. Furthermore, following RAE Decision No 908/2017 (GG II 4461/19.12.2017), which was adopted on the basis of the Article 137A(1) referred to above, and by way of which it was decided to exclude all of the NII from the derogation scheme provided for in Decision 2014/536/EU and the opening of the market for the supply of electricity to all of the NII was completed on 1 January 2018, with infrastructure for a transitional period of application of the NII Code, similar to those that were already in place in the systems of Crete and Rhodes. The national framework governing the entrustment of this SGI meets the criteria set out in the 2012 SGEI Framework, in line with the Commission's decision on the relevant State aid case SA 32060 (see paragraphs 149-152).</p>
<p>Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.</p>
<p>It is not possible to determine the duration of the obligation to provide the public service in question. Understandably, when any of the islands interconnects with the mainland, its consumers will be able to benefit from the prices applicable to the interconnected system and, therefore, there will no longer be any need to impose an SGI obligation.</p> <p>Furthermore, pursuant to the EU Decision to grant Greece a derogation from the provisions of Article 33 of Directive 2009/72/EC on market access, PPC is responsible, in fact and in law, for providing this SGI throughout the period of validity of the derogation. The derogation is valid until 17 February 2016 or until full installation of the infrastructure as provided for by the NII Code, whichever comes later. Under recital 82 of the Decision on the derogation concerning isolated networks, the derogation applies until an interconnection between that network and the Greek interconnected network becomes fully operational. In any case, the derogation ceases to apply on 17 February 2019.</p> <p>In the light of the above parameters, the duration of the SGI obligation is considered to be limited in time, provided that the interconnection of the island is considered to be the most cost-effective</p>

<p>solution to the autonomous development of the island (see, in this respect, paragraph 90 et seq. of Commission Decision 2014/536/EU, and Articles 108A and 133 of Law 4001/2011.</p>
<p>Explanation whether (typically) exclusive or special rights are assigned to the undertakings.</p>
<p>Commission Decision C(2014) 5902 (2014/536/EU) granted Greece a derogation from the provisions of Article 33 of Directive 2009/72/EC on market opening, which applied retroactively from 5 December 2003 (see also Articles 2 and 5 of the Decision). This derogation concerns small isolated networks and isolated micro-networks, that is to say all of the NII. The granted derogation is valid until 17 February 2016 or until full installation of the infrastructure as provided for in Article 237(7) of the NII Code, whichever comes later. In any case, the derogation ceases to apply on 17 February 2019.</p> <p>It should also be noted that (a) consumers of the Crete system, which pursuant to Directive 2009/72/EC is a small isolated system, are designated as eligible customers under Law 4001/2011; and (b) for other islands, which are isolated micro-networks and whose current legal framework defines consumers as non-eligible customers (Article 134(6) as replaced by Article 24(4) of Law 4414/2016, 137 and 137A of Law 4001/2011), the choice of opening the market to introduce new suppliers is a legislative option of the Greek State and depends on the timing of the setting up of the necessary infrastructure.</p> <p>As mentioned above, pursuant to Article 137A of Law 4001/2011, the island of Crete is not subject to the derogation and the island of Rhodes has been excluded from the derogation for the supply of electricity from 1 January 2017. Furthermore, RAE Decision No 908/2017 excluded all of the NII from the above derogation scheme from 1 January 2018 and opened the market in the electricity supply sector to all of the NII with infrastructure for a transitional period of implementation of the NII Code.</p> <p>Although no exclusive or special rights have been granted to PPC or any other undertaking due to the particular circumstances inherent in the activity of suppliers on the NII, which are also acknowledged by the Derogation Decision, PPC is currently de facto the only supplier on the NII, except for Crete and Rhodes.</p>
<p>Which aid instruments have been used (direct subsidies, guarantees, etc.)?</p>
<p>‘Direct subsidy’ The amount of ‘SGI_NII compensation’ is approved by RAE decision, and is paid by the customers of all electricity suppliers, on the basis of distinct charges on their bills. As provided for in Article 36(2) of Law 4067/2012, the relevant cost is evenly distributed to each category of (end) customers across the country: ‘2. The persons liable for the payment of the public utilities compensation are the users of each electricity supply, who pay the compensation to electricity providers, billed as a separate charge on the energy bills they receive detailing their consumption as determined by the competent Network Operator.’</p> <p>Furthermore, the above provision of Article 36(2), as replaced by Article 55(2) of Law 4508/2017 (GG I 200/22.12.2017), now provides that self-supplied customers are also liable to pay the SGI compensation. The same article also provides that ‘The SGI compensation is paid in accordance with the relevant Codes of Management by providers and self-supplied customers to the special SGI account held by the competent Operator, pursuant to Article 55(8) of Law 4001/2011. Full compensation is paid by the Operator from the revenue of the special account to holders of electricity supply licences for the public utility services they provide. If the year-end balance of the SGI special account is in deficit or surplus, the unit charges of the SGI compensation under paragraph 1(a) are adjusted in December of each year, as part of the monitoring of the special account, following a recommendation by the RAE; this adjustment takes into account any cumulative deficits pursuant to Article 55(10) of Law 4001/2011, estimates of the amount of SGI compensation for the next three years and any costs that are covered by the State budget pursuant to the following</p>

sentence. By decision of the Minister for Finance, the State budget may cover, fully or partially, the cost of providing SGI by means of a corresponding credit as input to the special management account for SGI kept by the competent operator, pursuant to Article 55(8) of Law 4001/2011.’ Pursuant to the above enabling provision, Decision ΔΟΔ/0002445/ΕΞ2017 of the Minister for Finance on covering the cost of providing services of general interest (GG II 4487/19.12.2017) was adopted; under that Decision EUR 476 million was paid from the State budget to the special fiduciary account for SGI, held at the time of adoption of the decision by the Independent Power Transmission Operator ADMIE, as its administrator, under Article 55(8) of Law 4001/2011, as applicable at that point in time, to be subsequently attributed by ADMIE to the beneficiaries of the SGI_NII compensation.

Typical **compensation mechanism** as regards the respective services, including the **aid instrument** (direct subsidy, guarantee, etc.) used and whether a methodology based on cost allocation or the net avoided cost methodology is used.

‘RAE Decision 14/2014 based on net avoided cost’

The cost of production of electricity on the NII taken into account in the calculation of the compensation for the SGI provision obligation concerns only the production of electricity on these islands and, therefore, does not include the cost of any other PPC activities. Therefore, the methodology for calculating the SGI compensation does not take into account any indirect costs.

The existing compensation methodology (RAE Decision No 14/2014) adopts the net avoided cost methodology set out in the 2012 SGEI Framework. This means that the compensation covers the difference resulting from the cost of electricity on the interconnected network and the NII network, which exceeds the basic regulated charges such as the network usage fees, the greenhouse gas reduction levy, etc. The compensation is calculated monthly and for each non-interconnected island electricity network (NII network) so that the supplier operating in the specific NII network recovers the SGI compensation corresponding to that network. A final year-end settlement of accounts for the monthly compensation calculated during the previous year is carried out after the RAE checks and approves the costs taken into account in the calculations, in terms of type and reasonableness.

The avoided costs deriving from the fact that the national electricity transmission system is not being used for the supply of electricity to the NII are taken into account and used to reduce the overall cost of providing the public service and thus the amount that needs to be recovered via public service charges applied to all consumers.

In establishing the SGI compensation, the Greek authorities take into account the entire revenue earned from the sale of electricity on the NII. PPC does not have any special or exclusive rights that could create excessive profits. Although PPC is, de facto, the sole supplier on the NII, with the exception of Crete and Rhodes, this is a consequence of the specific situation of electricity generation on the NII (as recognised by the Derogation Decision) and does not entail any special or exclusive rights.

The applicable compensation mechanism has been held to be compatible with the 2012 SGEI Framework (see Commission Decision on State aid case SA 32060, paragraphs 164-190).

Typical **arrangements for avoiding and repaying any overcompensation.**

‘Ex post data review and approval of compensation – retrospective review and provision for corrective settlements’

Greece has set up and consistently applies a system for checking each year that the suppliers on the NII are not receiving compensation in excess of the amount determined in accordance with the respective methodologies described above.

Article 20(11) of Law 4203/2013 requires that the RAE prepare an annual report on the inspection of cost data used to compute the compensation so that consumers do not have to pay unreasonable costs. It provides that ‘[t]he amount of the cost for the production activity performed by conventional units, under these contracts, is checked by the RAE and is recognised retrospectively when determining the compensation owed for providing the services of general interest to the consumers of the Non-Interconnected Islands under the current legislation.’

The RAE is also in charge of checking the separate accounts of licence holders relating to their activities performed under licences which relate to any supply to eligible or non-eligible customers (see Article 28(3) and (4) of Law 3426/2005). Article 141 of Law 4001/2011 provides that the integrated undertakings must keep separate accounts for each of their activities (supply, production, distribution) and that the accounts must be presented in separate accounting records. For PPC and its operations on the non-interconnected islands, the corresponding obligation is also laid down in Article 5(2) of Annex 7 to the Electricity Generation and Supply (Licences) Regulation No Δ5/Β/Φ1/οικ. 17773 (GG II 1423/22.10.2001).

The obligation to keep separate accounts showing the financial compensation paid for discharging SGI obligations is also expressly laid down in Article 55 of Law 4001/2011. The keeping of separate accounts is a requirement for compensation to be paid (Article 55(8), last sentence).

Please find below the relevant provisions of the applicable framework:

RAE Decision 14/2014 (GG II 270/2014) on the methodology for calculating the compensation to cover the costs of providing Services of General Interest on the Non-Interconnected Islands (NII)

Recital (in B):

‘Whereas, taking into account the criteria set out in points (a), (b) and (c) Article 56(2) of Law 4001/2011 and in the light of the foregoing, it is evident that the compensation calculated does not exceed the difference between the operating costs of a supplier under a service of general interest obligation and one without such an obligation, since, in order to provide customers with single tariffs in accordance with the above, the difference in the supply cost is covered using the methodology.

Furthermore, the methodological approach for the SGI_NII compensation does not take into account the costs the supplier would have sought to avoid, had there been no SGI, since these are costs the supplier would bear in any case for supplying electricity on an NII system. The provision of the SGI_NII is associated exclusively with charges that are imposed solely by virtue of the structure and operation of the market of the NII system in which a supplier decides to operate, and are not dependent on the framework and conditions of operation of its business. [...]

Whereas, under Article 20(11) of Law 4203/2013, when calculating the SGI_NII compensation, an annual audit must be carried out of the costs data on which this compensation is calculated to avoid it being charged with unreasonable costs.’

Article 1(6): ‘After the end of each calendar year (t) and within the time limits laid down in the NII Management Code and the relevant Producers and Suppliers NII Market Participation contracts, the unitary monthly final compensation $MA_{\text{ΜΑΝΣΜ},\mu}$ Settle and $MA_{\text{ΜΑΝΑΠΕ},\mu}$ Settle for every month (μ) of the year (t) are calculated by the NII Operator, taking into account the final available cost and energy data of paragraphs (2) and (3) above. The results of the calculations are submitted to the RAE for approval, along with the detailed raw data on which the calculations were based (Table,

Annex I and any accompanying supporting data). On the basis of the approved unitary monthly final compensations, as well as the outturn data of energy charges corresponding to each supplier (j) operating in each NII system ($QX, \Sigma M(\mu, j)$ Settle and $QX, \Delta \Pi E(\mu, j)$ Settle), the NII Operator calculates the monthly final settlement compensations $A_M \Delta N \mu, j$ Settle for each Supplier, applying the following formula (7) and settles in full any differences arising from the corresponding provisional compensations $A_M \Delta N \mu, j$ Temp.

$A_M \Delta N \mu, j$ Settle = $MA_M \Delta N \Sigma M, \mu$ Settle $\times QX, (\mu, j)$, Settle + $MA_M \Delta N \Delta \Pi E, \mu$ Settle $\times QX, \Delta \Pi E(\mu, j)$, Settle – $XX \Sigma \mu, j$ Settle (7).'

RAE Decision No 39/2014 on the 'Code of Management of Electric Power Systems on the Non Interconnected Islands'

Article 171 – Accounting operations on the Accounts

1. The accounting records of Article 170 include all accounting operations and particularly debit and credit operations of the participants, as provided for in the provisions of this Code. They also include charges or refunds of previous payments of participants needed to balance the corresponding accounting records. The movements on these accounts are to be executed for the producers per unit and for the load representatives per meter category they represent.

2. This Code sets out, separately for each account, the calculation method of the credits and debits of the participants as well as the method of allocating the surplus or deficit of the corresponding accounting records. Details regarding the accounting operations of this Chapter may be specified in the NII Market Operation Manual.

Article 179 – Accounting operations for the Services of General Interest Special Account (Λ-H)

1. Amounts debited to the Λ-H Account are payments of the NII Operator to the beneficiaries of the compensation for the provision of the SGI on the NII, in accordance with the legislation in force.

2. Amounts credited to the Λ-H Account are the amounts corresponding to the load representatives' consumers, as resulting from the energy consumed per meter category they represent on the NII, and the charges for coverage of the SGI compensation, in accordance with the legislation in force.

3. The Λ-H Account is also debited or credited as appropriate so that it is balanced both after the month-end settlement and the year-end final settlement by means of the necessary fund transfers from and to the SGI Special Account, kept by the System Operator. When the Λ-H Account of the NII Operator shows a debit balance, it is credited with funds from the SGI Special Account kept by the Transmission System Operator to bring it into balance. When it shows a credit balance, the Λ-Θ account of the NII Operator is debited by transferring the surplus funds to the SGI Special Account held by the Transmission System Operator to bring it into balance.

4. The month-end and year-end final settlement procedure is followed for the above debits and credits, and these amounts are also included in the corresponding settlement statements.

Article 184 - Year-End Final Settlement Procedure

1. At the end of each calendar year, the NII Operator prepares the Year-End Final Settlement for the current year per NII system, which involves:

(a) taking into account any potential differences between the meter readings and other data which were used to calculate the debits and credits of the monthly settlement statements and the final outturn data for the year;

(b) identifying any errors in the initial calculations of the debits and credits of the month-end settlement statements;

(c) verifying, on the basis of the latest data, any estimates made in the event of settlement in

exceptional situations, pursuant to Article 187;

(d) determining the actual cost for emergency cover pursuant to Article 155;

(e) determining the actual cost for covering operating expenses and overheads pursuant to Article 180;

(f) taking into account the outcome of any dispute settlement procedure.

2. In order to determine the amount of debits and credits during the year-end final settlement procedure and to make the relevant bank transactions, the NII Operator uses the NII Market Settlement function of the NII Information System.

3. The year-end final settlement of the NII Market is carried out per NII system and includes individual final settlements for: Energy purchases/sales, auxiliary services, capacity assurance mechanism, special accounts of the NII RES and the NII SGI, cover of emergency costs, cover of operating expenses of the NII operator and the management of overheads, collection of fees in favour of third parties/network usage charges, and penalties.

4. By 15 February of the year following the settlement year, the NII Operator submits the cost and energy accounting data for each NII system to the RAE for checking. By 15 March of the year following the settlement year, the RAE adopts a decision approving the final cost data as regards the reasonableness of the amount and the type of the individual costs of the production activity, which the NII Operator used to calculate the compensation for provision of the SGI under Article 1(1) of Ministerial Decision ΠΔ5/ΗΛ/Β/Φ1Β/12924/13.062007 (GG II 1040/ 25.06.2007), as amended and in force, for each NII system, according to the legislation in force.

5. By 26 March of the year following the settlement year, the NII Operator sends each participant the year-end settlement statement concerning that year. The year-end settlement statement lists debits and credits arising from the year-end final settlement.

6. Any participant who disputes the contents of the year-end settlement statement must send the NII Operator reasoned objections, in writing and within 10 calendar days from the notification of the statement, stating the precise reasons for the objections, the disputed amount, the dispatch date and all the relevant data and evidence to support the objections.

7. The NII Operator must make a reasoned decision on such objections within 10 calendar days from notification of the objections, and any differences that arise are included in the settlement statement for the next settlement procedure that is practically possible, also in accordance with the applicable tax legislation. Any dispute between the parties which remains unresolved following the above procedure will be resolved in accordance with the provisions of Chapter 2.

8. The year-end settlement statement is issued in the same format and with the same content as the month-end settlement statement for each month of the settlement year.

9. Where the year-end final statement shows a debit balance for the NII Operator, the participant promptly issues and sends the relevant invoice to the NII Operator, duly endorsed, based on the data set out in the year-end settlement statement, notwithstanding any objections of the participant. The NII Operator issues the relevant bank order to pay the participant within 10 working days from the notification of the invoice, notwithstanding any objections concerning the amounts due.

10. Where the year-end final settlement shows a credit balance for the NII Operator, the NII Operator issues and sends the relevant invoice to the participant, duly endorsed, along with the year-end settlement statement. The participant must pay the debt within 5 working day, notwithstanding any objections concerning the amounts due.

11. If the debt has not been paid in full after this time limit has expired, the participant is presumed to be in default as regards payment of the amounts due. The total amounts which correspond to a default by a producer are set off against the payments they are due to receive in the next monthly

settlement procedure. The total amounts which correspond to a default by a load representative constitute a transaction deficit for the settlement year and the procedures under Article 185 apply.

12. A participant who works together with the NII Operator to resolve a dispute arising from a specific year-end settlement statement must pay the cost of carrying out settlement recalculations pursuant to the provisions of Article 41. These amounts will be returned to the participant if the outcome of the settlement recalculations shows that the year-end settlement statement was incorrect. These costs are recorded in the month-end settlement statement of the next settlement period.

13. Details regarding the format and content of the year-end settlement statement and the relevant invoices and bank operations, as well as the manner and content of the communication between the participants and the NII Operator for purposes of year-end final settlement may be set out in the NII Market Operating Manual.

Annex to NII Code 'Agreement on Load Representative Participation in the NII Market'

Article 4 'Calculation of Debits/Credits'

1. For each settlement period, the NII Operator calculates the following debits/credits per NII i system:

(a) The debits of the load representative ($XE\Phi_j$) for the energy are calculated according to the following formula: $XE\Phi_j = M\pi K\pi_i \times QX(\Sigma M)_i + MMK(M\Delta N)_i \times QX(A\pi E)_i$

where

$M\pi K\pi_i$: the price, in €/MWh, arising from the average full cost of electricity production from conventional units in each NII i system, as calculated by the NII Operator,

$QX(\Sigma M)_i$: the energy invoiced to the load representative from conventional units in the NII i system per settlement period,

$MMK(M\Delta N)_i$: the price, in €/MWh, of the average variable cost of electricity production from conventional units, as calculated by the RAE and valid for the NII system for the settlement month, according to the applicable provisions,

$QX(A\pi E)_i$: the Energy Invoiced to the Load Representative from RES/High Efficiency CHP and Hybrid Units in the NII i system per invoicing period,

(b) The debits and credits of the load representative for the SGI arising from calculation of the amounts owed to the load representative as compensation for its operation in the NII i system, and the amount which it must pay to the relevant NII Operator from the SGI charges corresponding to its customers, according to the legislation in force. More specifically, the credits for compensation of the supplier for its operation in the NII (NII SGI) are first of all calculated in advance by the NII Operator for each settlement period on the basis of the data on remuneration of the producer from conventional stations and in accordance with the calculation methodology used for these SGI expenses, and are definitively settled on an annual basis, following a check by the RAE on the reasonableness of the amount and type of the individual expenses of the production activity in the calculation of the SGI compensation under Article 1(1) of Ministerial Decision ΠΔ5/ΗΛ/Β/Φ1Β/12924/13.06.2007 (GG II 1040/25.06.2007), as amended and in force. As regards the credits for compensation of the remaining SGI provided by the load representative, the legislation in force applies.

(c) Other debits or credits of the load representative (network usage charges, in favour of third parties, etc.) in accordance with the provisions of the applicable legislation, provided that the applicable legislation does not explicitly provide for a different method for allocating them to their beneficiaries.

2. The total debit/credit of the load representative is the sum of the individual debits/credits for the

totality of the NII (n) systems, i.e.:

$$XE\Phi = \sum_{i=1}^n XE\Phi_i$$

Article 8 'Transaction Settlement - Invoicing'

1. At the end of each settlement period, the NII Operator calculates the amounts of Article 4, and applies the month-end settlement procedure provided for in the NII Code (issuing and notification of the month-end settlement statement, assessment of the objections, issuing of the invoices, entry in the accounts/payment, etc.) with the appropriate adjustments for application of the provisions on the basis of the average monthly amounts.

The month-end settlement statement is prepared on the basis of the data submitted by the producers from conventional units on the NII as well as other data available to the NII Operator (meter readings, etc.).

2. At the end of each calendar year, the NII Operator calculates the final outturns referred to Article 4, taking into account the actual data for the production activity in the NII systems and applies the year-end final settlement procedure, as provided for in the NII Code (submission of the accounting data to the RAE for review and approval, issuing and notification of the year-end settlement statement, assessment of objections, issuing of invoices, entry in the accounts/payment).

As a result of the intensive monitoring and thorough checking of the data concerning the critical parameters of the Methodology (RAE Decision No 14/2014), in 2017 the Authority approved the interim compensation for the years 2014-2016 on an ex post basis by Decision No 688/2017.

As can be seen from the current framework, owing to the settlement procedure, based on outturns, which is scrupulously followed, the possibility of granting compensation over and above what is necessary ('overcompensation') is prevented.

A short explanation of how the **transparency requirements** (see Paragraph 60 of the 2012 SGEI Framework) are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).

The statutory framework on the provision of SGI on the NII can be found on the [RAE](#) website:

The results of the public consultation carried out by the RAE on the new methodology for calculating compensation for discharging SGI on the NII are also posted on the RAE website:

(http://www.rae.gr/categories_new/about_rae/activity/global_consultation/history_new/21102013.csp).

The amounts of aid granted to undertakings providing SGI every year are also posted on the RAE website (alternatively follow the links: RAE (Home Page) > Consumers > FAQs

http://www.rae.gr/site/categories_new/consumers/fag/electridty.csp).

Finally, in compliance with the transparency requirements governing the granting of State aid, the RAE publishes the relevant data separately on this page: RAE (Home Page) > /

State aid /Electricity / SGI (http://www.rae.gr/site/categories_new/statesub/elec/yko.csp).	
Amount of aid granted	
Total amount of aid granted (in EUR millions). This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)	
2018	2019
EUR 646 million (estimated on the basis of preliminary payments of the Hellenic Electricity Distribution Network Operator DEDDIE)	EUR 688 million (estimated on the basis of preliminary payments of the Hellenic Electricity Distribution Network Operator DEDDIE)
A: Total amount of aid granted (in EUR millions) paid by national central authorities	
2018	2019
EUR 646 million (estimated on the basis of preliminary payments of the Hellenic Electricity Distribution Network Operator DEDDIE)	EUR 688 million (estimated on the basis of preliminary payments of the Hellenic Electricity Distribution Network Operator DEDDIE)
B: Total amount of aid granted (in EUR millions) paid by regional authorities	
2018	2019
0	0
C: Total amount of aid granted (in EUR millions) paid by local authorities	
2018	2019
0	0
Share of expenditure per aid instrument (direct subsidy, guarantees etc.) (if available)	
2018	2019
0	0
Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of the undertakings)	
2018	2019
Not available, as the compensation for the year 2018 has not yet been finalised by the RAE.	Not available, as the compensation for the year 2018 has not yet been finalised by the RAE.

OTHER NON-MANDATORY INFORMATION

1. AIR LINKS FOR MARGINAL ROUTES

Clear and comprehensive description of how the respective services are organised in your Member State.

Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State.

Please list the **contents of the services entrusted as SGEI** as clearly as possible.

Since 2001 (following the approval of the European Commission), the Ministry of Transport and the Civil Aviation Authority (CAA), taking into account the provisions of Article 4 of Council Regulation (EEC) No 2408/92 of 23 July 1992 on access for Community air carriers to intra Community air routes, as replaced by Regulation (EC) No 1008/2008 as regards Articles 16, 17 and 18, have put into effect programmes for the provision of public services in respect of scheduled air services throughout Greece.

These programmes have ensured certain levels of air services as regards frequency, capacity and fares, to the great satisfaction of local authorities and local inhabitants, as they have helped to solve the problem of isolation and to support further development in these areas.

The public service obligations were initially imposed on 10 routes, which began operating following a tender procedure in December 2001. These were:

- *Athens - Astypalaia*
- *Athens - Ikaria*
- *Athens - Leros*
- *Athens - Milos*
- *Athens - Skyros*
- *Thessaloniki - Samos*
- *Thessaloniki - Chios*
- *Limnos - Mytilini - Chios - Samos - Rhodes*
- *Rhodes - Karpathos - Kasos*
- *Rhodes - Kastelorizo*

In 2003, 12 more routes were integrated into a public service provision programme:

- *Athens - Kythira*
- *Athens - Naxos*
- *Athens - Paros*
- *Athens - Karpathos*
- *Athens - Siteia*
- *Athens - Skiathos*
- *Thessaloniki - Skyros*
- *Thessaloniki - Corfu*
- *Rhodes - Kos - Leros - Astypalaia*
- *Corfu - Aktio - Kefalonia - Zakynthos*
- *Alexandroupoli – Siteia*
- *Aktio - Siteia*

In 2006 the PSO for the *Athens - Astypalaia* route was extended to *Kalymnos* and the PSO for the *Rhodes - Karpathos - Kasos* route was extended to *Siteia*.

In 2007 the following routes were integrated into a public service provision programme:

- *Thessaloniki - Kalamata*
- *Athens - Kalymnos* (when this route came into service the *Athens - Astypalaia* route started

<p>operating independently again, i.e. without the extension to Kalymnos)</p> <ul style="list-style-type: none"> Thessaloniki - Limnos - Ikaria (the tender for this service was unsuccessful) <p>In 2010 the following came into operation as public service routes:</p> <ul style="list-style-type: none"> Athens - Kozani - Kastoria and Thessaloniki - Limnos - Ikaria <p>When renewing the obligation, from 1 April 2012 the following routes were extended:</p> <ul style="list-style-type: none"> Rhodes - Kos - Athens - Astypalaia to include Kalymnos as an intermediate station between Kos and Leros, and Corfu - Aktio - Kefalonia - Zakynthos to Kythira. <p>The following came into operation as public service routes from 1 April 2012:</p> <ul style="list-style-type: none"> Athens - Syros and Athens - Zakynthos <p>On renewal of the entire programme for the provision of public services on scheduled air services within Greece in 2016, the PSO was amended from 1 October 2016 on the following routes:</p> <ul style="list-style-type: none"> Corfu - Aktio - Kefalonia - Zakynthos; the connection to Kythira was discontinued. Rhodes - Karpathos - Kasos; the connection to Siteia was discontinued.
Explanation of the (typical) forms of entrustment . If standardised templates for entrustments are used for a certain sector, please attach them.
The existing <u>Public Service Obligations</u> and the applicable fares on each route are shown in Tables I and II respectively.
Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years . Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.
The <u>entrustment of the operation of routes</u> to airlines and the time period for their operation was not more than four years. A breakdown of the relevant data is shown in Table III .
Explanation whether (typically) exclusive or special rights are assigned to the undertakings.
Following public, international tenders, the right to exclusive operation of the scheduled air services was assigned in accordance with Article 16(9) of Regulation (EC) No 1008/2008.
The attached Table III shows whether or not the routes are operated exclusively.
Which aid instruments have been used (direct subsidies, guarantees, etc.)?
Direct subsidies in the form of financial compensation.
Typical compensation mechanism as regards the respective services, including the aid instrument (direct subsidy, guarantee, etc.) used and whether a methodology based on cost allocation or the net avoided cost methodology is used.
<p>To determine the amount of the financial compensation, air operators/bidders must submit a financial tender which includes the total amount of the requested financial compensation both per quarter and for the entire duration of the contract (i.e. four years), to proper performance of the public service obligations imposed on each route for which a bid is submitted.</p> <p>The financial tender must include:</p> <p>(i) A detailed breakdown of the estimated annual costs (direct and indirect operating costs) of each</p>

<p>service, by route, quarter and year:</p> <p>The estimated annual costs of the use of the aircraft on each route comprise direct operating costs (<i>cost of capital / aircraft lease, crew cost, aircraft insurance, agent commission, aircraft maintenance, fuel, catering, airport charges, cost of ground handling and other direct costs, if any, which the air operator must determine accurately</i>) and indirect operating costs (<i>marketing and sales expenses, station expenses, administrative costs and other indirect costs, if any, which the air operator must determine accurately</i>).</p> <p>(ii) A detailed analysis of the estimated revenue from the operation of the service:</p> <p>The estimated annual revenue is calculated based on the fares already determined per service by the Civil Aviation Authority and included in the tender notice, after also taking into account (per service, quarter and year) the available capacity (round-trips), the load factor and the number of passengers.</p> <p>(iii) The estimated reasonable percentage profit per service:</p> <p>The estimated reasonable percentage profit per service, route and year does not exceed 10% of the total cost (<i>direct and indirect operating cost</i>) per route and service (<i>profit = 10% * total cost</i>).</p> <p>In the light of the above, the amount of the financial compensation, by route and by service, is determined as the difference between the estimated revenue and the estimated expenditure, to which a reasonable profit is added.</p> <p>Full Template for Calculation of Financial Compensation (Table IV)</p>
<p>Typical arrangements for avoiding and repaying any overcompensation.</p> <p>If only one tender is submitted, and it is deemed to be seeking financial compensation that is too high, the tender committee negotiates with the bidder to agree a reduction in the amount of financial compensation. Usually, a 2-3% reduction in the profit rate is achieved.</p>
<p>A short explanation of how the transparency requirements (see Paragraph 60 of the 2012 SGEI Framework) are being complied with. In your answer please also include some relevant examples of information published for this purpose (e.g. some links to websites or other references), indicate whether you have a central website on which you publish this information for all aid measures concerned in your Member State (and if so provide the link to this website), or alternatively explain if and how the publication takes place at the level granting the aid (e.g. central, regional or local level).</p>
<p>The notice of the imposition of public service obligations on scheduled air routes and the call for proposals is published in the Official Journal of the European Union and in the Greek Government Gazette/Public Tender Notices Issue.</p> <p>The full text of the imposition of obligations and the call for proposals is posted on the CAA website (hcaa.gr).</p> <p>The full text of the call for proposals is also published in two national newspapers.</p>
<p>Amount of aid granted</p>

Total amount of aid granted (in EUR millions). This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)			
2018		2019	
9 954 467.41		10 664 738.52	
A: Total amount of aid granted (in EUR millions) paid by national central authorities			
2018		2019	
9 954 467.41		10 664 738.52	
B: Total amount of aid granted (in EUR millions) paid by regional authorities			
2018		2019	
0		0	
C: Total amount of aid granted (in EUR millions) paid by local authorities			
2018		2019	
0		0	
Share of expenditure per aid instrument (direct subsidy, guarantees, etc.) (if available)			
2018		2019	
0		0	
Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of the undertakings)			
2018		2019	
Astra Airlines	1 784 180.29	Astra Airlines	1 158 994.31
Sky Express	6 042 509.48	Sky Express	8 119 099.95
Olympic Air	2 127 777.64	Olympic Air	1 386 644.26

TABLE I - Public Service Obligations**Minimum frequency of flights and minimum seats available per week on each route**

	<i>Air route</i>	<i>Weekly frequencies per season</i>	<i>Minimum seats available per week per season</i>
		low/shoulder/high	low/shoulder/high
1	<i>Athens - Astypalaia</i>	3 / 4 / 6	90/120/180
2	<i>Athens - Kalymnos</i>	3 / 4 / 6	75/100/150
3	<i>Athens - Ikaria</i>	3 / 4 / 6	90/120/180
4	<i>Athens - Leros</i>	3 / 4 / 6	90/120/180
5	<i>Athens - Milos</i>	3 / 4 / 6	90/120/180
6	<i>Athens - Skyros</i>	3 / 4 / 6	90/120/180
7	<i>Athens - Kythira</i>	3 / 4 / 6	90/120/180
8	<i>Athens - Naxos</i>	3 / 4 / 6	90/120/180
9	<i>Athens - Paros</i>	7 / 10 / 14	140/200/280
10	<i>Athens - Karpathos</i>	3 / 4 / 6	90/120/180
11	<i>Athens - Siteia</i>	3 / 4 / 6	120/160/240
12	<i>Athens - Skiathos</i>	3 / 4 / 6	60/80/240
13	<i>Athens - Skyros</i>	3 / 4 / 6	60/80/120
14	<i>Athens - Zakynthos</i>	5 / 6 / 7	175/300/350
15	<i>Thessaloniki - Samos</i>	3 / 4 / 6	180/240/360
16	<i>Thessaloniki - Chios</i>	3 / 4 / 6	180/240/360
17	<i>Thessaloniki - Corfu</i>	2 / 2 / 2	90/90/90
18	<i>Thessaloniki - Skyros</i>	2 / 2 / 2	60/60/60
19	<i>Thessaloniki - Kalamata</i>	3 / 4 / 6	150/200/300
20	<i>Thessaloniki - Limnos - Ikaria</i>	3 / 4 / 6	90/120/180
21	<i>Limnos - Mytilini - Chios - Samos - Rhodes</i>	2 / 2 / 3	50/50/75
22	<i>Rhodes - Kastelorizo</i>	3 / 4 / 6	60/80/120
23	<i>Rhodes - Karpathos - Kasos</i>	3 / 4 / 6	90/120/180
24	<i>Rhodes - Kos - Kalymnos - Leros - Astypalaia</i>	2 / 2 / 3	50/50/75
25	<i>Corfu - Aktio - Kefalonia - Zakynthos</i>	2 / 2 / 3	50/50/75
26	<i>Alexandroupoli - Siteia</i>	2 / 2 / 2	60/60/60
27	<i>Aktio - Siteia</i>	2 / 2 / 2	60/60/60
28	<i>Athens - Kozani - Kastoria</i>	3 / 3 / 3	120/120/120

Low season means the IATA winter season.

Shoulder season means the season from the start of the IATA summer season, April, May and October, until the end of the IATA summer season.

High summer season means the months of June, July, August and September.

TABLE II - Fares

The reference price of a one-way economy-class fare cannot exceed the following amounts:

ROUTE	Maximum fare in the low and shoulder season	Maximum fare in the high summer season
Athens - Astypalaia	65	80
Athens - Ikaria	60	75
Athens - Leros	65	80
Athens - Milos	55	70
Athens - Kythira	60	70
Athens - Naxos	65	80
Athens - Paros	65	80
Athens - Karpathos	75	90
Athens - Siteia	75	90
Athens - Skiathos	60	75
Athens - Kalymnos	70	90
Athens - Skyros	50	65
Athens - Zakynthos	55	70
Athens - Syros	55	70
Athens - Kozani	60	75
Athens - Kastoria	70	80
Kozani - Kastoria	35	40
Thessaloniki - Samos	80	95
Thessaloniki - Chios	70	85
Thessaloniki - Corfu	70	85
Thessaloniki - Kalamata	85	100
Thessaloniki - Skyros	70	90
Thessaloniki - Limnos	65	75
Thessaloniki - Ikaria	70	85
Limnos - Ikaria	40	55
Alexandroupoli - Siteia	80	95
Aktio - Siteia	80	95
Corfu - Aktio	45	55
Corfu - Kefalonia	45	55
Corfu - Zakynthos	50	65
Aktio -Kefalonia	40	50
Aktio - Zakynthos	45	55
Kefalonia - Zakynthos	45	55
Limnos - Rhodes	70	85
Limnos - Mytilini	45	55
Limnos - Chios	45	55
Limnos - Samos	45	55
Mytilini - Chios	40	50
Mytilini - Samos	45	55
Mytilini - Rhodes	65	80
Chios - Samos	40	55
Chios - Rhodes	50	70
Samos - Rhodes	45	60
Rhodes - Kasos	45	60

Rhodes - Karpathos	40	55
Karpathos - Kasos	35	45
Rhodes - Kos	50	65
Rhodes - Kalymnos	55	65
Rhodes - Astypalaia	60	70
Rhodes - Leros	60	70
Kos - Astypalaia	60	70
Kos - Kalymnos	45	60
Kos - Leros	50	65
Astypalaia - Leros	50	65
Kalymnos - Leros	45	60
Astypalaia - Kalymnos	50	60
Rhodes - Kastelorizo	40	55

The above fares do not include charges levied on passengers departing from Athens Eleftherios Venizelos International Airport or VAT.

Finally, pursuant to Article 16(c) of Law 2892/2001, no Airport Modernisation and Development Fee (TEAA) is imposed on the air links included in the PSO programme.

TABLE III

1. ROUTE		2. AIRLINE(S) OPERATING THE ROUTE	3. CONTRACT VALIDITY
1.	Athens - Paros	OLYMPIC AIR - SKY EXPRESS	01/10/2016 to 30/09/2020
2.	Athens - Zakynthos	OLYMPIC AIR - SKY EXPRESS	01/10/2016 to 30/09/2020
3.	Athens - Ikaria	OLYMPIC AIR - SKY EXPRESS	01/10/2016 to 30/09/2020
		ASTRA AIRLINES	31/03/2019 to 09/11/2019
4.	Athens - Karpathos	OLYMPIC AIR - SKY EXPRESS	01/10/2016 to 30/09/2020
5.	Athens - Kythira	OLYMPIC AIR - SKY EXPRESS	01/10/2016 to 30/09/2020
6.	Athens - Skiathos	OLYMPIC AIR - SKY EXPRESS	01/10/2016 to 30/09/2020
7.	Thessaloniki - Samos	OLYMPIC AIR - SKY EXPRESS	01/10/2016 to 30/09/2020
		ASTRA AIRLINES	01/10/2016 to 09/11/2019
8.	Thessaloniki - Chios	OLYMPIC AIR - SKY EXPRESS	01/10/2016 to 30/09/2020
		ASTRA AIRLINES	01/10/2016 to 09/11/2019
9.	Athens - Milos	OLYMPIC AIR - SKY EXPRESS	01/04/2017 to 31/03/2021
10.	Athens - Naxos	OLYMPIC AIR - SKY EXPRESS	01/04/2017 to 31/03/2021
11.	Athens - Siteia	OLYMPIC AIR	01/04/2017 to 31/03/2021
12.	Athens - Syros	SKY EXPRESS	01/10/2016 to 30/09/2020
13.	Athens - Astypalaia	SKY EXPRESS	01/10/2016 to 30/09/2020
14.	Thessaloniki - Limnos - Ikaria	ASTRA AIRLINES	01/10/2016 to 09/11/2019
		OLYMPIC AIR	01/12/2019 to 30/06/2020
15.	Athens - Leros	OLYMPIC AIR	01/10/2016 to 30/09/2020
16.	Athens - Skyros	OLYMPIC AIR	01/10/2016 to 30/09/2020
17.	Thessaloniki - Kalamata	OLYMPIC AIR	01/10/2016 to 30/09/2020
18.	Rhodes - Kastelorizo	OLYMPIC AIR	01/10/2016 to 30/09/2020
19.	Rhodes - Karpathos - Kasos	SKY EXPRESS	01/10/2016 to 30/09/2020
20.	Athens - Kalymnos	SKY EXPRESS	12/04/2018 to

			30/09/2020
21.	Thessaloniki - Skyros	SKY EXPRESS	01/04/2017 to 31/03/2021
22.	Limnos - Mytilini - Chios - Samos - Rhodes	SKY EXPRESS	01/04/2017 to 31/03/2021
23.	Corfu - Aktio - Kefalonia - Zakynthos	SKY EXPRESS	01/04/2017 to 31/03/2021
24.	Thessaloniki - Corfu	SKY EXPRESS	12/04/2018 to 31/03/2021
25.	Aktio - Siteia	SKY EXPRESS	01/10/2017 to 30/09/2021
26.	Alexandroupoli – Siteia	SKY EXPRESS	01/06/2018 to 30/09/2021
27.	Rhodes - Kos - Kalymnos - Leros - Astypalaia	SKY EXPRESS	01/06/2018 to 30/09/2021
28.	Athens - Kozani - Kastoria	ASTRA AIRLINES	31/08/2018 to 09/11/2019
		SKY EXPRESS	01/12/2019 to 30/06/2020

N.B.:

- 1. Routes 1-11 run on Open PSOs following interest expressed by airlines.*
- 2. Routes 12, 15 and 17 are run without compensation, exclusively under a tendering procedure.*

TABLE IV

FINANCIAL TENDER TEMPLATE

1. ESTIMATED ANNUAL REVENUE

On the basis of the fares listed in the technical tender, the estimated annual revenue (on a quarterly basis from the starting date) is as follows:

Service:	1st quarter	2nd quarter	3rd quarter	4th quarter	Annual total
Available capacity (round-trip)					
Average load factor					
Number of passengers					
Revenue					

ESTIMATED ANNUAL EXPENDITURE

Each of the three tables below must be completed per flight and on a quarterly basis from the date the flights are scheduled to start.

Service:	Per flight	Per quarter				Annual total
		1st quarter	2nd quarter	3rd quarter	4th quarter	
Aircraft utilisation (in block hours)						
Trip length (in nautical miles)						
Block Time (in minutes)						
Block Time (in hours)						
Block fuel (in kilograms)						

Direct costs	Per flight	Per quarter				Annual total
		1st quarter	2nd quarter	3rd quarter	4th quarter	
Aircraft: Cost of capital/lease						
Crew						
Insurance						
Agents' commission						
Maintenance						
Fuel						
Catering						
Duties						
Ground handling						
Other (please specify)						
TOTAL						

Indirect costs (in EUR)	Per flight	Per quarter				Annual total
		1st quarter	2nd quarter	3rd quarter	4th quarter	
Marketing						
Sales						
Station expenses						
Administration						
Other (please specify)						
TOTAL						

3. FINANCIAL COMPENSATION

The amount of financial compensation sought by the applicant air carrier to perform flights on the route per flight, per quarter, per year, broken down and in total for the four-year period is:

	Per flight	Per quarter				Annual total
		1st quarter	2nd quarter	3rd quarter	4th quarter	
Total cost (direct + indirect)						
- Revenue						
= Difference						
+Profit (percentage profit*Total cost)						
= <u>Financial Compensation Sought</u>						

TOTAL FINANCIAL COMPENSATION OF THE FOUR-YEAR PERIOD:

.....

TABLE V

TOTAL FINANCIAL COMPENSATION PAID DURING THE FOUR-YEAR PERIOD 2015-2019

In million EUR

(Actual disbursements after the relevant audits were completed)

2015	2016	2017	2018	2019
51 618 989	46 019 424	18 563 150	9 954 467.41	10 664 738.52

2. MARITIME LINKS FOR MARGINAL ROUTES

ORGANISATION: Ministry of Shipping and Island Policy – Directorate for Maritime Transport

Clear and comprehensive description of how the respective services are organised in your Member State.
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the contents of the services entrusted as SGEI as clearly as possible.
<p>In order to provide the public with adequate transport services, public service contracts are concluded between the Greek State and the Community shipowners following a public, international, open tender procedure, in accordance with the provisions of Article 4 of Council Regulation (EEC) No 3577/92 of 7 December 1992, Article 8 of Law 2932/2001 (GG I 145), as amended, Directive 2004/18/EC of the European Parliament and of the Council of 31 March 2004, transposed by Presidential Decree 60/2007 (GG I 64), and the provisions of Law 4413/2016 on awarding and performance of concession contracts – harmonisation with Directive 2014/23/EU of the European Parliament and of the Council of 26 February 2014 on the award of concession contracts (OJ L 94/1/28.3.2014) (GG I 148).</p> <p>The invitation to tender, and thus the conclusion of the public service contracts, takes place only if it has been determined, for each route concerned, that either there is lack of commercial interest in operating transport services or the existing regular transport services would be inadequate if their provision was left to market forces alone; furthermore, the details of the routes covered by the invitation are clearly defined in the text of the invitation.</p> <p>The short-sea routes which are served under public service contracts concern maritime links on which the average annual traffic during the two financial years preceding that in which the service was entrusted does not exceed 300 000 passengers.</p> <p>Under the public service contracts in question, specific ferry routes are operated, which firstly ensure a satisfactory level of the provided services (frequency, fares, etc.) and secondly connect the densely-populated Greek islands with the mainland, thus making a decisive contribution to the economic, social and territorial cohesion of Greece.</p>
Explanation of the (typical) forms of entrustment . If standardised templates for entrustments are used for a certain sector, please attach them.
<p>Public service contracts are concluded following a public, international open invitation to tender pursuant to Article 4 of Council Regulation (EEC) No 3577/92 of 7 December 1992, Article 8 of Law 2932/2001 (GG I 145), as amended, and Directive 2004/18/EC of the European Parliament and of the Council of 31 March 2004, transposed by Presidential Decree 60/2007 (GG I 64), and the provisions of Law 4413/2016 on the award and performance of concession contracts – harmonisation with Directive 2014/23/EU of the European Parliament and of the Council of 26 February 2014 on the award of concession contracts (OJ L 94/1/28.3.2014) (GG I 148).</p>
A model of the public service entrustment contracts is shown in TABLE I.
Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.

Owing to fiscal problems, approximately 72% of public service contracts are for one year. The proportion of contracts with a duration of more than ten years is around 12% and concerns public service contracts concluded in 2009 and 2010.

The possibility of concluding public service contracts for a duration of up to 12 years is expressly provided for in Article 8(5) of Law 2932/2001 (GG I 145) and is in full compliance with the sectoral EU legislation. In section 5.7 of the Communication from the Commission on the interpretation of Council Regulation (EEC) No 3577/92 of 7 December 1992 (COM (2014) 232 final of 22 April 2014), the Commission clearly takes the view that contracts with a duration of more than 12 years might be acceptable*, since experience, and particularly a study carried out on behalf of the Commission, shows that 'small islands' could be understood to mean islands where the total annual number of passengers carried by sea to and from the island is around 300 000 or fewer.

[*translator's note: There is a problem with the Greek version of the Communication at this point.

English: The Commission takes the view that a longer duration of contracts, of 12 years, might be acceptable.

French: La Commission pense qu'il est possible d'envisager des contrats d'une durée plus longue, à savoir 12 ans.

Greek: Η Επιτροπή θεωρεί ότι συμβάσεις διάρκειας άνω των 12 ετών μπορούν να γίνουν αποδεκτές. (= The Commission takes the view that contracts with a duration of more than 12 years might be acceptable.)

Explanation whether (typically) **exclusive or special rights** are assigned to the undertakings.

No exclusive or special rights have been entrusted to the undertakings concerned.

Which **aid instruments** have been used (direct subsidies, grants, guarantees, etc.)?

The cost of implementing the services is borne by the Public Investment Programme (PIP) 2019 of the Ministry of Shipping and Island Policy, collective project decision (SAE) 150 (project code: 2019ΣΕ15000003) 'Contracts for the Entrustment of a Public Service for Ferry Routes'

Explanation of the (typical) **compensation mechanism** as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.

In accordance with the Altmark criteria, the parameters on the basis of which the compensation is calculated must be established in advance in an objective and transparent manner, and the compensation cannot exceed what is necessary to cover all or part of the costs incurred in discharging the public service obligations, taking into account revenues and a reasonable profit for discharging those obligations.

The conditions of the invitation to tender define, in a clear, objective and transparent manner, the maximum compensation limit per case, which is different and specific to each route. Thus, in order to define the compensation, a Coastal Shipping Board appointed by Law 2932/2001 takes into account the consumption of fuel required to cover the distance in nautical miles between the linked ports, the length of the ship, its age, its capacity in passengers as well as its capacity in vehicles.

The Community shipowners who participate in the tender are invited to submit a bid lower than the maximum offered by the State for each route put out to tender.

Thus, bearing in mind that the tender procedure is open (international, public tender procurement), the compensation is essentially defined in accordance with the market price for the provision of the service, i.e. to cover the net cost (including a reasonable margin of profit), that each of the bidders envisaged.

Explanation of the (typical) arrangements for avoiding and repaying (recovering) any overcompensation.	
<p>Given that, firstly, the maximum compensation offered is defined in advance and is known to the EU shipowners who participate in the tender procedure and, secondly, that each EU shipowner decides whether or not they will participate in the tender procedure by submitting an offer purely on the basis of business and/or financial criteria, it is evident that the lowest price criterion, as a criterion for the selection of the lowest bidder among the EU shipowners who express their wish to participate in the tender, is a guarantee that the compensation offered does not exceed what is necessary to provide the public service.</p>	
<p>A short explanation of how the transparency requirements (see Article 7 of the 2012 SGEI Decision) for the aid above 15 million euro to undertakings that also have activities outside the scope of the SGEI) are being complied with.</p>	
<p>The choice of an open tender procedure (Article 1(11) of Directive 2004/18/EC of the European Parliament and of the Council of 31 March 2004) rather than a restricted or negotiated procedure, thereby guaranteeing a transparent and fair procedure, and also the rules on the publication of the notice and the time limit for the tender procedure, which, under Law 4413/2016 (GG I 148) on the award and performance of concession contracts – harmonisation with Directive 2014/23/EU of the European Parliament and of the Council of 26 February 2014 on the award of concession contracts (OJ L 94, 28.3.2014, p. 1), must be 35 days from the date on which the notice was published by the Publications Office of the European Union, constitute a procedure which effectively minimises distortion of competition.</p>	
Amount of aid granted	
Total amount of aid granted. This includes all aid paid in your territory, including aid paid by regional and local authorities for the years 2018 and 2019. (A+B+C)	
2018	2019
Budget: EUR 90 million (State budget)	Budget: EUR 130 million (Public Investment Programme)
A: Total amount of aid granted (in EUR millions) paid by <u>national central</u> authorities	
2018	2019
Total amount of aid granted (in EUR millions) paid by <u>regional</u> authorities	
2018	2019

Total amount of aid granted (in EUR millions) paid by <u>local</u> authorities	
2018	2019
Share of expenditure per aid instrument (direct subsidy, guarantees etc.) (if available)	
2018	2019
Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of the undertakings)	
2018	2019

3. INFORMATION ON OTHER MEANS TO ENSURE THE PROVISION OF SGEI SERVICES

SERVICE	SGEI PROVIDER	LEGAL FRAMEWORK	DURATION OF SGEI ENTRUSTMENT (years)	INSTRUMENT	COMPENSATION PAID IN 2018	COMPENSATION PAID IN 2019
Treatment of mixed residual municipal waste and pre-sorted biowaste (domestic and similar) in the region of Epirus	Region of Epirus	ALTMARK CRITERION	27	DIRECT ESIF SUBSIDY (COHESION FUND)	14 429 406.65	359 386.56
Treatment of mixed residual municipal waste and pre-sorted biowaste (domestic and similar) in the Regional Unit of Serres	Regional solid waste management operators (SWMO) of Central Macedonia	ALTMARK CRITERION	27	DIRECT ESIF SUBSIDY (COHESION FUND)	5 662 209.96	4 292 898.19
Separate collection and transport of biowaste (domestic and similar) in the municipality of Vari-Voula-Vouliagmeni	Municipality of Vari-Voula-Vouliagmeni	REGULATION 360/2012	3	DIRECT ESIF SUBSIDY (COHESION FUND)	62 861.18	137 189.00