



**HELLENIC REPUBLIC  
MINISTRY OF FINANCE  
SECRETARIAT-GENERAL FOR ECONOMIC POLICY  
DIRECTORATE-GENERAL FOR STATE AID AND ASSISTANCE  
CENTRAL STATE AID UNIT**

**SGEI REPORT FOR THE YEAR 2022  
(In accordance with the 2012 SGEI Decision and the SGEI framework 2012)**

**1. OVERVIEW OF EXPENDITURE**

<b>Total SGEI government expenditure by legal basis (EUR millions)</b>		
	2020	2021
Total compensation for Services of General Economic Interest (1+2)		
(1) Total compensation granted on the basis of the SGEI Decision	47.742	35.839
(2) Total compensation granted on the basis of the SGEI Framework	828.421	17.508

## **2. APPLICABILITY OF THE 2012 SGEI DECISION**

<b>A. SGEI COMPENSATION NOT EXCEEDING AN ANNUAL AMOUNT EUR 15 MILLION (Art. 2(1)(a))</b>
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**A. WASTE COLLECTION**

**A1 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 <sup>1</sup>
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><b>Action:</b></p> <ul style="list-style-type: none"> <li>- <b>CONSTRUCTION OF A LANDFILL SITE FOR THE EASTERN SECTOR OF THE REGION OF EASTERN MACEDONIA AND THRACE (MIS 50110501)</b></li> </ul> <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 Recyclable Materials Sorting Centres (RMSCs) in Alexandroupoli and Didymoteicho. The project was in the construction phase on 31 December 2021; it is not yet in operation and has no revenue.</p> <ul style="list-style-type: none"> <li>- <b>Actions for the Integrated Management of Municipal Waste, municipality of Prosotsani</b></li> </ul> <p>The service covers supply, contracting and other accompanying projects for the adoption of actions for the integrated management and treatment of municipal waste in the municipality of Prosotsani and the municipality of Kato Nevrokopi. This includes actions for home composting, sorting at source, construction of a composting plant – waste transfer station (WTS) and procurement of equipment for the plant and public utility connections. It also includes the services of a specialised advisor while the action is being implemented. The implementation of the proposed actions meets the requirements of the legislation to divert the biodegradable fraction of municipal solid waste (MSW) from landfills in accordance with the Regional Waste Management Plan (RWMP). In detail, provision is made for the construction of an aerobic treatment facility for pre-sorted organic waste (composting) and a WTS, and for the supply of composting equipment and bins. The project is in the construction phase (July 2022); it is not yet in operation and has no revenue.</p>

<sup>1</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. **If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate**, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial.

### **KAVALA LANDFILL**

The service covers the landfilling of residues from the treatment of mixed municipal solid waste in the municipalities of the Regional Units of Kavala and Drama. It will also serve the municipality of Thassos for the first three years of operation as it is expected that the island's landfill will be constructed during this period. These quantities include residues resulting from the sorting of recyclable materials at the Recyclable Materials Sorting Centres (RMSCs) in Drama.

This includes the actions 'Construction of a Kavala landfill site', i.e. the construction of the landfill site, which is provided for in the Regional Solid Waste Management Plan (RSWMP) for the Region of Eastern Macedonia and Thrace, 'Connection to a medium-voltage power grid', which concerns the connection to a medium-voltage grid, necessary to meet the energy requirements of the infrastructure, 'Purchase of land' and 'Mobile equipment', which concerns the procurement of mobile equipment necessary for the landfill site to operate properly.

The project was in the construction phase in July 2021; it is not yet in operation and has no revenue.

### **CONSTRUCTION OF A WASTE TRANSFER STATION FOR THE MUNICIPALITY OF DOXATO**

The service covers the transfer and compression of municipal solid waste from the municipality of Doxato so that it can be taken to waste management sites (RMSCs and waste treatment plant/landfill). The action provides for the construction of a waste transfer station (WTS). The waste is compressed and transported using special semi-trailers (road trains) fitted with an integrated compression system.

The project was in the construction phase in July 2021; it is not yet in operation and has no revenue.

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

- Action: CONSTRUCTION OF A LANDFILL SITE FOR THE EASTERN SECTOR OF THE REGION OF EASTERN MACEDONIA AND THRACE (MIS 50110501). Entrustment was awarded by the Decision to include the action in the OP 'Transport Infrastructure, Environment and Sustainable Development', ref. 1565/18.05.2018.
- Action: Integrated Management of Municipal Waste, municipality of Prosotsani (MIS 5010594). Entrustment was awarded by the Decision to include the action in the OP 'Transport Infrastructure, Environment and Sustainable Development', ref. 4983/24.12.2018.
- Action: KAVALA LANDFILL (MIS 5011456). Entrustment was awarded by the Decision to include the action in the OP 'Transport Infrastructure, Environment and Sustainable Development', ref. 1564/18.05.2018.
- Action: CONSTRUCTION OF A WASTE TRANSFER STATION FOR THE MUNICIPALITY OF DOXATO (MIS 5033127). Entrustment was awarded by the Decision to include the action in the OP 'Transport Infrastructure, Environment and Sustainable Development', ref. 4925/29.10.2018.

**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.

- Action: CONSTRUCTION OF A LANDFILL SITE FOR THE EASTERN SECTOR OF THE REGION OF EASTERN MACEDONIA AND THRACE (MIS 50110501). 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.
- For the action 'Integrated Municipal Waste Management of the municipality of Prosotsani', the duration of the entrustment will be 25 years. According to the financial analysis guidelines, the reference period for waste management projects is 25-30 years. The period of 25 years corresponds to the depreciation of the building infrastructure and the electromechanical equipment. A period of 25 years is considered reasonable as the provision of the service requires a significant investment, which needs to be amortised over a longer period in accordance with generally accepted accounting principles.
- For the action 'CONSTRUCTION OF A WASTE TRANSFER STATION FOR THE MUNICIPALITY OF DOXATO', the duration of the entrustment will be 25 years. According to the financial analysis guidelines, the reference period for waste management projects is 25-30 years. The period of 25 years corresponds to the depreciation of the building infrastructure and the electromechanical equipment. A period of 25 years is considered reasonable as the provision of the service requires a significant investment, which needs to be amortised over a longer period in accordance with generally accepted accounting principles.

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

Actions:

- CONSTRUCTION OF A LANDFILL SITE FOR THE EASTERN SECTOR OF THE REGION OF EASTERN MACEDONIA AND THRACE (MIS 50110501)
- KAVALA LANDFILL
- CONSTRUCTION OF A WASTE TRANSFER STATION FOR THE MUNICIPALITY OF DOXATO
- Actions for the Integrated Management of Municipal Waste, municipality of Prosotsani

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

<p>Typical <b>compensation mechanism</b> as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.</p>	
<p>The compensation granted for the actions by these decisions 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 is being carried out through an open competition procedure under Directive 2004/18/EC.</p>	
<p>Typical <b>arrangements for avoiding and repaying any overcompensation.</b></p>	
<p>A short explanation of how the <b>transparency requirements</b> (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><b>Total amount of aid granted (in EUR millions)<sup>2</sup>.</b> This includes all aid granted in your territory, including aid granted by regional and local authorities. <b>(A+B+C)</b></p>	
<p><b>2020</b></p>	<p><b>2021</b></p>
<p><b>1.024</b></p>	<p><b>1.73</b></p>

<sup>2</sup> As stipulated in Article 9(b) of the 2012 SGEI Decision.

## A2. 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 <sup>3</sup>
<p>Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the <b>contents of the services entrusted as SGEI</b> as clearly as possible.</p> <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, pre-sorted organic fraction of municipal waste, green 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 m<sup>3</sup>. 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 m<sup>3</sup>.</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> <p>Explanation of the (typical) forms of entrustment. If standardised templates for entrustments are used for a certain sector, please attach them.</p>

<sup>3</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. **If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate**, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial.

The decision to entrust an SGEI comprises a number of regulatory and administrative acts, including:

- 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 action

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.

Approval of the relevant RWMP for MIS 5003945:

Decision No 414/2016 of the Regional Council of the Region of Central Greece approving the revised Regional Solid Waste Management Plan for the Region of Attica, which was approved by Joint Ministerial Decision No οικ. 61490/5302/19.12.2016 (GG II 4175/2016).

The Solid Waste Management Operators are entrusted with the management (temporary storage, transfer, recovery/treatment and final disposal) of municipal waste, in accordance with Article 7(2.a) of Joint Ministerial Decision No 50910/2727/2003, Article 1 of Joint Ministerial Decision No 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 1909/2003) 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) <b>exclusive or special rights</b> 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 <b>aid instruments</b> have been used (direct subsidies, guarantees, etc.)?
Direct grant from the 2014-2020 Partnership Agreement (Priority Axis 'Improving Quality of Life in the Urban Environment' of the OP 'Attica 2014-2020') with ERDF funding.
Typical <b>compensation mechanism</b> as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.
<p>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.</p> <p>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.</p> <p>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.</p> <p>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 action in the OP 'Attica 2014-2020'.</p> <p>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 duration correspond to the maturity and duration of the entrustment act.</p>
Typical <b>arrangements for avoiding and repaying any overcompensation.</b>

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 framework of responsibilities
- 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 SGEI
- Any extensions of SGEI provision
- Any activities other than an approved SGEI
- The applicable repayment procedure for any overcompensation received.

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.

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).

Not applicable.

**Amount of aid granted**

<b>Total amount of aid granted (in EUR millions)<sup>4</sup>. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)</b>	
<b>2020</b>	<b>2021</b>
<b>0.594</b>	<b>0.211</b>

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<sup>4</sup> As stipulated in Article 9(b) of the 2012 SGEI Decision.

### A3. ORGANISATION: 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 <b>contents of the services entrusted as SGEI</b> 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) <b>forms of entrustment</b> . 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>
<b>Average duration of the entrustment (in years)</b> and the proportion of entrustments that are <b>longer than 10 years</b> (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 Delegated Regulation (EU) No 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) <b>exclusive or special rights</b> 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 <b>aid instruments</b> have been used (direct subsidies, guarantees, etc.)?	
Direct grant from the Cohesion Fund.	
Typical <b>compensation mechanism</b> 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.	
<b>Typical arrangements for avoiding and repaying any overcompensation.</b>	
<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 (Municipality - Member) 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><u>Annual management cost (re-determined) – Annual management cost (budgeted) = Divergences for the year.</u></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>	
A short explanation of how the <b>transparency requirements</b> (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 provider will receive aid below EUR 15 million (EUR 9 943 422.35) and under inclusion decision No 1049/11.7.17 (6E3O7A9-028), 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	
<b>Total amount of aid granted (in EUR millions).</b> Includes all aid paid in your territory, including aid paid by regional and local authorities. (A+B+C)	
<b>2020</b>	<b>2021</b>
<b>0.662</b>	<b>0.320</b>

#### A4. ORGANISATION: OP Managing Authority for the Region of Thessaly

<b>Clear and comprehensive description of how the respective services are organised in your Member State<sup>5</sup></b>
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the <b>contents of the services entrusted as SGEI</b> as clearly as possible.
The service entrusted as an SGEI, the costs of which are included in this report, concerns the transfer of mixed municipal solid waste (MSW) collected by refuse collection vehicles from the municipality of Trikkaia and transported to the Western Thessaly landfill site in Trikala. During transfer, the mixed municipal waste collected by refuse collection vehicles is transferred to semi-trailers (trailer caissons) specially designed and built for such transport. During transfer the waste is compacted to maximise the load of the semi-trailers. The waste is compacted (with densities of up to 0.5 tonnes/m <sup>3</sup> ) using a special press incorporated into each semi-trailer (caisson). For the SGEI provider (SWMO of Western Thessaly) to provide the MSW transfer service properly requires investment to procure and install the necessary equipment and to build the necessary infrastructure.
Explanation of the (typical) <b>forms of entrustment</b> . If standardised templates for entrustments are used for a certain sector, please attach them.
<b>Decision to include the entrustment in the Operational Programme</b> ‘Transport Infrastructure, Environment and Sustainable Development 2014-2020’, ref. 1699/14.05.2019.
<b>Average duration of the entrustment (in years)</b> and the proportion of entrustments that are <b>longer than 10 years</b> (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 SGEI is 25 years and is justified by the fact that to provide the service requires a significant investment from the service provider. Therefore, the duration of the proposed SGEI is determined on the basis of the time required for amortisation and the value of fixed assets, also taking into account reinvestment in electromechanical equipment. According to Commission Delegated Regulation (EU) No 480/2014 on waste management projects this period is between 25 and 30 years. <i>Therefore, a 25-year entrustment period for the provision of this service is considered reasonable. During this period, the SGEI provider is obliged to transfer MSW to the Western Thessaly landfill site on behalf of the municipal units of the municipality of Trikkaia, without interruption and without discrimination.</i>
Explanation whether (typically) <b>exclusive or special rights</b> are assigned to the undertakings.
The service provider ‘PERIVALLONTIKI ANAPTIXIAKI DYTIKIS THESSALIAS SA (‘Western Thessaly Environmental Development’) is the SWMO for Western Thessaly, in accordance with Article 245(4) of Law 4555/2018.
Which <b>aid instruments</b> have been used (direct subsidies, guarantees, etc.)?

<sup>5</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. **If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate**, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial.

Direct subsidy from 2014-2020 Partnership Agreement: Axis 14 of the OP ‘Transport Infrastructure, Environment and Sustainable Development’ financed from the Cohesion Fund.
Typical <b>compensation mechanism</b> as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.
<p>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.</p> <p>The level of public financing is determined by means of a financial analysis to determine the compensation in accordance with the law on SGEIs.</p> <p>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’.</p> <p>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.</p>
Typical <b>arrangements for avoiding and repaying any overcompensation.</b>
The relevant SGEI decision and supporting documents (documentation reports) contain the following provisions:
<p><b><u>Verified parameters for checking and reviewing compensation:</u></b></p> <ul style="list-style-type: none"> <li>• SGEI provider</li> <li>• Content and duration of the SGEI</li> <li>• Geographical area of service</li> <li>• Activities other than SGEI</li> <li>• Annual compensation for SGEI, i.e. revenue/expenses (including reinvestments)</li> </ul> <p><b><u>Procedure to verify the level of compensation:</u></b></p> <p>On an annual basis, the SGEI provider collects the data and sends them to the competent verification body, with a copy to the competent Managing Authority, including at least the following:</p> <ol style="list-style-type: none"> <li>1. Details of the SGEI provider and framework of responsibilities</li> <li>2. Served users/geographical area</li> <li>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: <ul style="list-style-type: none"> <li>- Type and amount of waste managed by the facility</li> </ul> </li> </ol>



4. Efficiency of the facility by section (in/out)
  - Fulfilment of quality objectives, if they have been set
  - Reports of scheduled and non-scheduled shutdowns
5. Charges and other revenues (in accordance with the revenue categories of the parameters for calculating and checking compensation above)
6. Annual expenditure by category (in accordance with the revenue categories of the parameters for calculating and checking compensation above)
7. Activities other than an approved SGEI

### **Compensation control body**

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
- 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 to be transferred
- Charges and other revenues (in accordance with the revenue categories of the parameters for calculating and checking compensation above)
- 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 SGEI
- Any extensions of SGEI provision
- Any activities other than an approved SGEI
- The applicable repayment procedure for any overcompensation received.

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 amended and completed accordingly.

### **Mechanism for recovery/correction of overcompensation**

In accordance with Article 5 of Joint Ministerial Decision No 2527/2009, by the end of September of each year the Management Board of **PERIVALLONTIKI ANAPTIXIAKI DYTIKIS THESSALIAS SA (Western Thessaly Environmental Development SA)** must determine the annual contribution of each municipality that participates in the SWMO (Municipality – Member) for the following year, according to its projected waste quantities. 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.

Under Article 5 of JMD 2527/2009 and Article 237 of Law 4555/2018, the management costs are re-determined the following year using the actual data of the previous year. Any resulting divergences are included in the calculation of the management cost for the following year, and are determined as follows:

Annual management cost (re-determined) – Annual management cost (budgeted) = Divergences for the year.

It is therefore clear that, in the event of overcompensation, the SWMO **PERIVALLONTIKI ANAPTIXIAKI DYTIKIS THESSALIAS (Western Thessaly**



<b>Environmental Development SA)</b> is able to make a correction by adjusting the MSW management fee (contribution).	
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).	
Not applicable	
<b>Amount of aid granted</b>	
<b>Total amount of aid granted (in EUR millions)</b> <sup>6</sup> . This includes all aid granted in your territory, including aid granted by regional and local authorities. <b>(A+B+C)</b>	
<b>2020</b>	<b>2021</b>
0	0.33

<sup>6</sup> As stipulated in Article 9(b) of the 2012 SGEI Decision.

**A5. ORGANISATION: Managing Authority of the OP ‘Transport Infrastructure, Environment and Sustainable Development’**

<b>Clear and comprehensive description of how the respective services are organised in your Member State</b>
<b>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.</b>
<p><b>MUNICIPAL SOLID WASTE MANAGEMENT SECTOR</b></p> <p>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.</p> <p>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, JMD 2527/2009, Law 4071/2012, Law 4555/2018, Law 4685/2020, Law 4819/2021); Law 4819/2021 lays down the general framework of conditions and obligations governing the general management of waste in implementation of Directive 2008/98/EU, as amended by the package of circular economy directives (2018/851/EU, 2018/850/EU, 2018/852/EU).</p> <p>According to current legislation, the Regional Waste Management Plan (RWMP) of each Region is prepared by the relevant regional Solid Waste Management Operators (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).</p> <p>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.</p> <p>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).</p> <p>The Managing Authority for the OP ‘Transport Infrastructure, Environment and Sustainable Development’ of the Ministry of Development and Investment finances the following</p>

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 m<sup>3</sup>, 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 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 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 m<sup>3</sup> 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 5001777)**

The service 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/m<sup>3</sup>) 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.
<p><b>11. Safe disposal of municipal waste by landfill on the island of Kos (MIS 5009884)</b></p> <p>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.</p>
<p><b>12. Safe disposal of municipal waste by landfill in Southern Rhodes (MIS 5010484)</b></p> <p>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.</p>
<p><b>13. Safe disposal of municipal waste treatment residues in the Regional Unit of Arta by landfill (MIS 5037435)</b></p> <p>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.</p> <p>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 m<sup>3</sup>, including daily soil cover, and a lifetime of 28.5 years, receiving 6 560 tonnes of residues per year.</p>
<p><b>14. Separate collection of biowaste and separate streams of recyclable waste, transfer of waste of the municipality of Paranesti (MIS 5001770)</b></p> <p>The service covers the treatment of biowaste from the settlements of the municipality of Paranesti, with a total population of 3 901, the enhancement of recycling through the collection of recyclable materials at a Green Point and the transfer of the remaining mixed municipal solid waste for further management outside the municipality. The quantity managed will be 1 623 tonnes/year. Of this, mixed MSW accounts for 1 380 tonnes/year and pre-sorted organic waste 243 tonnes/year. A quantity of waste from streams of recyclable materials and green waste (estimated at 1 000 tonnes/year) and bulky waste will</p>

also be managed.

For the SGEI provider (DIAAMATH AAE, Regional SWMO of Eastern Macedonia, Thrace) properly to provide the described service requires investment for the construction of a local management facility, which includes a biowaste treatment plant, a Green Point and a transfer station.

**15. Municipal waste transfer service from the municipal unit of Orfanos, municipality of Pangaio (MIS 5002123)**

The service covers the transfer of municipal waste from the municipal unit of Orfanos in the municipality of Pangaio for further management outside the municipality, with a population of 5 249 inhabitants served. For the SGEI provider (DIAAMATH AAE, Regional SWMO of Eastern Macedonia, Thrace) properly to provide the described service requires investment for the construction of a mobile transfer station located in a free section over an area of approximately 7.06 hectares in the Orfani area.

**16. Separate collection of biowaste and separate streams of recyclable waste of the municipality of Peristeri (MIS 5002254)**

The service covers the separate collection of pre-sorted biowaste, the separate collection of other discrete streams of recyclable municipal waste through a network of mobile Green Points, as well as the relevant information and awareness-raising in the Municipalities. The SGEI concerns municipal and similar waste. The SGEI provider must provide this service to the entire municipality of Peristeri with a total population of 139 981 permanent residents.

In order to establish the separate collection service for pre-sorted biowaste, a network of brown containers will be set up, to be collected by a refuse collection vehicle and transported to the mechanical recycling/composting plant at Fyli. The network for the separate collection of pre-sorted biowaste will be set up for 10% of the annual quantity produced for 2020, i.e. 2 640 tonnes/year. For the service of separate collection of discrete streams of recyclable municipal waste, two mobile Green Points will be provided for the collection of 1 969 tonnes/year of recyclable waste outside the Alternative Management System, and it is estimated that around 395 tonnes/year of packaging will be collected.

**17. Separate collection of biowaste and separate streams of recyclable waste of the municipality of Petroupoli (MIS 5002579)**

The service covers the separate collection of pre-sorted biowaste and the separate collection of other discrete streams of recyclable municipal waste through a network of Recycling Points, as well as the relevant public information campaigns.

The geographical area in which the SGEI provider is required to provide its service is the entire municipality of Petroupoli and the services are provided within the boundaries of the municipality of Petroupoli. For the SGEI provider to properly provide the service described requires investment (a) to create four (4) recycling points at appropriate sites (public spaces) within the administrative boundaries of the municipality of Petroupoli and procure one (1) collection vehicle; (b) to provide a network for the collection of pre-sorted biowaste (bins and two (2) refuse collection vehicles) with a view to separate collection and transport to the mechanical recycling/composting plant at Fyli; and (c) to organise a public information and awareness-raising programme.

**18. Treatment of pre-sorted biowaste and safe disposal of treatment residues by landfill on the island of Milos (MIS 5002059)**

The service covers the treatment by composting of pre-sorted biowaste and the safe disposal of mixed municipal waste and treatment residues at a landfill site on the island of Milos.

The SGEI provider must provide this service to the entire island of Milos, with a total population of 4 966 permanent residents.

For the SGEI provider to properly provide the service described requires investment to secure land for the construction of a landfill, to construct the landfill, to supply and install biowaste composting equipment, and to provide technical support to the SGEI provider. The infrastructure required for the landfill site will be constructed at Agioi Theodoroi – Bantroni in the municipality of Milos.

#### **19. Treatment of pre-sorted biowaste of Ierapetra (MIS 5002322)**

The service covers the biological treatment by aerobic composting of the organic fraction of the municipal solid waste pre-sorted at source of the municipalities of Ierapetra and Sitia in the Regional Unit of Lasithi in the Region of Crete.

This SGEI comprises the collection for treatment of 4 700 tonnes per year of pre-sorted biowaste and green waste, removal of impurities, composting, maturation and refining of composted material for the production of compost and the temporary storage of products and residues.

The services take place at a site belonging administratively to the municipality of Ierapetra in the ‘Platia Opsi’ area, on the site of the former Ierapetra landfill on healthy soil in the western part of that site.

For the SGEI provider to properly provide the service described requires investment to construct a biowaste treatment plant to treat a total of 4 700 tonnes/year of biowaste pre-sorted at source. After collection, the waste is weighed and transported for pre-treatment in order to prepare it before biological treatment. It is then taken to the aerobic composting plant and the composted material is sent for maturation and refining to produce good quality compost. The cost of a technical consultant to support the SGEI provider during the implementation phase of the project is also included.

#### **20. Treatment of pre-sorted biowaste of Archanes-Asterousia (MIS 5001235)**

The service covers the treatment of the separately collected organic fraction of municipal solid waste, i.e. collection of the pre-sorted organic fraction, aerobic biological treatment, and maturation and final refining of the product. The geographical area in which the SGEI provider must provide the service comprises the 5th Management Unit as regards the management of the organic fraction of waste and accordingly, on the basis of the new planning, serves the municipalities of Archanes-Asterousia, Gortyna, Malevizi and Faistos in the Prefecture of Heraklion. The above services all take place at the project location at the Rimampella site in the municipality of Archanes-Asterousia.

For the SGEI provider to properly provide the service described requires investment to construct the composting plant for the pre-sorted organic fraction of waste at the ‘Rimampella’ site in Metaxochori in the municipality of Archanes-Asterousia, with a capacity of 8 000 to 10 000 tonnes per year. The composting plant will receive and weigh incoming waste for pre-processing and rapid composting in closed channels, where the organic material is stirred with an inverter, ventilation and maceration of organic waste and extraction of material to the maturation plant, where the compost is stabilised and humified. An air separator will also be installed in this area for the final refining of the product. Also included are the costs of a technical consultant to support the provider during the implementation phase of the project and to prepare and carry out a publicity campaign.

#### **21. Safe disposal of municipal waste treatment residues in the Regional Unit of Chania by landfill (MIS 5001353)**

The service covers the final disposal of residues resulting from the treatment of municipal



solid waste in the Regional Unit of Chania, i.e. the municipalities of Chania, Apokoronos, Gavdos, Kantanos-Selino, Kissamos, Platanias and Sfakia, in accordance with the approved RWMP. The above services take place at the project location, covering an area of 68 706.18 m<sup>2</sup>.

The area of land covered by the landfill site in Akrotiri, Chania constitutes the necessary infrastructure for the solid waste management operator (DEDISA SA) to provide the service for the safe disposal of residues resulting from the treatment of municipal solid waste of the 1st Management Unit of the RMWP for Crete. The SGEI provider is expected to manage 37 206 tonnes of residue per year.

## **22. Baling and temporary storage of mixed municipal waste, treatment of residual mixed municipal waste and pre-sorted biowaste on the island of Lefkada (MIS 5009844)**

The service comprises, for the first 2 years, the baling and temporary storage of baled municipal waste from the municipalities of Lefkada and Meganisi and then the treatment by mechanical sorting and composting of municipal waste (separately collected organic, recyclable and residual mixed municipal waste) of the municipalities of Lefkada and Meganisi, as well as the residual mixed and separately collected organic materials of the municipality of Aktio-Vonitsa. The above services all take place at the location of the facilities at the ‘Alykes Lefkada’ site in the east of the city of Lefkada.

The geographical area in which the baling and temporary storage service is to be provided concerns the administrative territory of the municipalities of Lefkada and Meganisi in the Regional Unit of Lefkada, while the service for the treatment of municipal waste by mechanical sorting and composting concerns the administrative territory of the municipalities of Lefkada and Meganisi in the Prefecture of Lefkada and the municipality of Aktio-Vonitsa in the Prefecture of Aetolia-Acarnania. For the SGEI provider to properly provide the service described requires investment comprising the procurement and installation of a baler and the construction of a waste treatment and composting plant in the ‘Alykes Lefkada’ area of the municipality of Lefkada, with capacity for mechanical separation of 12 tonnes of pre-sorted organic material per hour. Larger items of waste are directed for further processing to recover recyclable materials. The biodegradable fraction is directed to the composting plant, where the pre-sorted organic municipal waste is fed into separate sectors. Composted organic materials are sent to a refiner and then matured on maturation plates to produce compost (from pre-sorted biowaste) and compost type A (compost-like output or CLO). The investment costs also include the costs of designing the treatment plant and procuring the required mobile equipment.

### **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

<p>concerned</p> <ul style="list-style-type: none"> <li>the legislative framework of public procurement</li> <li>the management and control system (MCS) of the 2014-2020 Partnership Agreement</li> </ul>		
<p><b>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.</b></p>		
<p>In the waste management sector, the following general cases are usually distinguished:</p> <p>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.</p> <p>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 the provision of the service. These times are in accordance with the implementing framework of the financial instrument.</p> <p>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.</p> <p>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).</p> <p>The SGEIs described with expenditure in 2020 and 2021 comprise the following:</p>		
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 – 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	26

	MACEDONIA AND THRACE IN ALEXANDROUPOLI	
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
5001770	TREATMENT OF PRE-SORTED BIOWASTE, SEPARATE COLLECTION OF RECYCLABLES AND TRANSFER OF WASTE – PARANESTI	27
5002123	TRANSFER OF MUNICIPAL WASTE – PANGAIO	25
5002254	SEPARATE COLLECTION OF BIOWASTE AND SEPARATE STREAMS OF RECYCLABLE WASTE – PERISTERI	6
5002579	SEPARATE COLLECTION OF BIOWASTE AND SEPARATE STREAMS OF RECYCLABLE WASTE – PETROUPOLI	10
5002059	TREATMENT OF PRE-SORTED BIOWASTE AND SAFE DISPOSAL OF MUNICIPAL WASTE – MILOS	25
5002322	TREATMENT OF PRE-SORTED BIOWASTE – IERAPETRA AND SITIA	25
5001235	TREATMENT OF PRE-SORTED BIOWASTE – ARCHANES-ASTEROUSIA	26
5001353	SAFE DISPOSAL OF RESIDUES IN LANDFILL – REGIONAL UNIT OF CHANIA	21
5009844	BALING AND TEMPORARY STORAGE, TREATMENT OF RESIDUAL MIXED WASTE AND PRE-SORTED BIOWASTE – LEFKADA	25
<b>Explanation whether (typically) exclusive or special rights are assigned to the undertakings.</b>		
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.		
<b>Which aid instruments have been used (direct subsidies, grants, guarantees, etc.)?</b>		
Direct subsidy from 2014-2020 Partnership Agreement:		

<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>
<p><b>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.</b></p>
<p>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.</p> <p>The level of public financing is determined by means of a financial analysis to determine the compensation in accordance with the law on SGEIs.</p> <p>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’.</p> <p>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.</p>
<p><b>Explanation of the (typical) arrangements for avoiding and repaying (recovering) any overcompensation.</b></p>
<p>The relevant SGEI decisions and supporting documents (documentation reports) contain the following provisions:</p> <p><b>MECHANISM FOR MONITORING OF OVERCOMPENSATION</b></p> <p>The mechanism for monitoring overcompensation operates as follows:</p> <p>Verified parameters for checking and reviewing overcompensation:</p> <ul style="list-style-type: none"> <li>• SGEI provider</li> <li>• Content and duration of SGEI</li> <li>• Geographical area of service</li> <li>• Annual compensation for SGEI, i.e. revenue/expenses</li> <li>• Activities other than SGEI</li> </ul> <p>Verification procedure in the operating phase:</p> <p>On an annual basis, the SGEI provider collects:</p> <ol style="list-style-type: none"> <li>1. Details of the SGEI provider and framework of responsibilities</li> <li>2. Served users/geographical area</li> <li>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: <ul style="list-style-type: none"> <li>• Type and amount of waste collected</li> </ul> </li> </ol>

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 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.

#### 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 (downwards) as appropriate.

**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).**

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](mailto:ymeperaa@mou.gr)

- Partnership Agreement Website: [espa@mnec.gr](mailto:espa@mnec.gr)
- The beneficiary of the aid must, as a minimum, take the publicity measures provided for in Regulation (EU) No 1303/2013.

#### Amounts 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	2020 (EUR million)	2021 (EUR million)
1	5001154	1.207	0.015
2	5001123	5.310	1.947
3	5001144	10.297	7.677
4	5001681	1.170	0.00
5	5001777	4.772	10.948
6	5001255	0.601	0.000
7	5010474	0.203	0.000195
8	5001837	0.645	0.000
9	5009847	4.953	4.184
10	5009884	0.355	0.407
11	5010484	0.049	0.007
12	5037435	2.927	0.516
13	5001473	0.461	0.000
14	5001770	0.046	0.457
15	5002123	0.000	0.022
16	5002254	1.039	0.062
17	5002579	0.000	0.016
18	5002059	0.000	0.391
19	5002322	0.000	0.023
20	5001235	1.871	1.603
21	5001353	1.068	1.122
22	5009844	0.000	0.493
	<b>TOTAL</b>	<b>36.974</b>	<b>29.890</b>



## A6. ORGANISATION: Region of Central Macedonia

<b>Clear and comprehensive description of how the respective services are organised in your Member State<sup>7</sup></b>
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the <b>contents of the services entrusted as SGEI</b> as clearly as possible.
<b>Waste/Residue Landfill of the 4th Administrative Unit of Chalkidiki – Phase 2:</b> Landfilling of mixed MSW of the municipality of Aristoteli.
Explanation of the (typical) <b>forms of entrustment</b> . 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. 444/27.1.2017.
<b>Average duration of the entrustment (in years)</b> and the proportion of entrustments that are <b>longer than 10 years</b> (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 entrustment of the service will be 26 years. According to the financial analysis guidelines, the reference period for waste management projects is 25-30 years. The period of 26 years corresponds to the depreciation of the building infrastructure and the electromechanical equipment. A period of 26 years is considered reasonable as the provision of the service requires a significant investment, which needs to be amortised over a longer period in accordance with generally accepted accounting principles.
Explanation whether (typically) <b>exclusive or special rights</b> are assigned to the undertakings.
The designated service provider is the municipality of Aristoteli.
Which <b>aid instruments</b> have been used (direct subsidies, guarantees, etc.)?
Direct subsidy
Typical <b>compensation mechanism</b> as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.
Financial analysis to determine the compensation
<b>Typical arrangements for avoiding and repaying any overcompensation.</b>
8.1. MECHANISM FOR MONITORING OF OVERCOMPENSATION For this SGEI, the mechanism for monitoring overcompensation operates as follows: Verified parameters for checking and reviewing overcompensation: <ul style="list-style-type: none"> <li>• SGEI provider</li> <li>• Content and duration of the SGEI</li> <li>• Geographical area of service</li> <li>• Annual compensation for SGEI, i.e. revenue/expenses</li> <li>• Activities other than SGEI</li> </ul> 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 Managing Authority, by 31 March of the following year: <ol style="list-style-type: none"> <li>1. Details of the SGEI provider and framework of responsibilities</li> </ol>

<sup>7</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. **If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate**, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial.

<p>2. Served users/geographical area</p> <p>3. Details of the Waste Producer's Annual Report entered in the Electronic Register of Waste referred to in Joint Ministerial Decision No ouk.43942/4026/2016 (GG II 2992/2016), in particular:</p> <ul style="list-style-type: none"> <li>• Type and amount of waste collected</li> </ul> <p>4. Details of operation of the service</p> <p>5. Reports of planned and exceptional interruptions of the SGEI</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Contracts for the disposal/sale of materials</li> <li>• Subsidies from Alternative Management Systems</li> <li>• Landfill charge</li> </ul> <p>7. Annual expenditure by category (in accordance with the expenditure categories of the parameters for calculating and checking compensation above), such as:</p> <ul style="list-style-type: none"> <li>• Working time and salaries of Green Point staff</li> <li>• Fuel consumption</li> <li>• Cost of regular maintenance of Green Point</li> <li>• Cost of public utilities, fuel, consumables</li> </ul> <p>8. Any activities other than an approved SGEI</p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Details of the SGEI provider and framework of responsibilities</li> <li>• Served users/geographical area</li> <li>• Report describing the SGEI</li> <li>• Type and amount of waste</li> <li>• Annual revenues (in accordance with the revenue categories of the parameters for calculating and checking compensation above), such as:</li> <li>• Annual expenditure by category (in accordance with the revenue categories of the parameters for calculating and checking compensation above)</li> <li>• Verification of the compensation calculation data and comparison with the SGEI entrustment decision</li> <li>• Confirmation of compliance with a separate accounting system for SGEI</li> <li>• Any activities other than an approved SGEI</li> <li>• The applicable repayment procedure for any overcompensation received</li> </ul> <p>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.</p>
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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.

## 8.2. MECHANISM FOR RECOVERY/CORRECTION OF OVERCOMPENSATION

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 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)<sup>8</sup>.** This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)

2020	2021
4.126	0.357

<sup>8</sup> As stipulated in Article 9(b) of the 2012 SGEI Decision.

## **B. SOCIAL SERVICES (Art. 2(1)(c))**

### **B1 ACCESS TO AND REINTEGRATION INTO THE LABOUR MARKET**

#### **B1a ORGANISATION: National Confederation of People with Disabilities**

##### **Clear and comprehensive description of how the respective services are organised in your Member State<sup>9</sup>**

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 SGEI Service ‘**Special Actions to Integrate Young People with Disabilities into Employment**’ is an integrated intervention aimed at serving the social need to ensure access to and reintegration into the labour market for young people with disabilities and/or chronic conditions, through an integrated package of measures to provide counselling, continuing vocational training, certification and work experience.

**The service is provided free of charge to all beneficiaries of the target group under the same conditions.**

The service comprises comprehensive vocational counselling, continuing vocational training (theoretical training and practical placements) and certification actions for 3 000 young persons with disabilities and/or chronic conditions who are on the National Employment Organisation (OAED) unemployment registers, up to the age of 29 (i.e. who have not yet completed their 30th year), who have completed secondary school or are graduates of vocational training institutes, universities or technical colleges and who are not in employment, education or training (NEETs), with a view to setting up a structured path to enter or reintegrate into the labour market.

The proposed SGEI aims to provide an integrated network of services to beneficiaries consisting of:

- (a) professional counselling (individual and group counselling),
- (b) a 150-hour horizontal training programme in ICT skills (to be followed by all beneficiaries),
- (c) a second training programme lasting 150 hours in specialised professional skills ‘Commerce/Trade and Exports’ or ‘Office/Administrative Support Officer’ (covering all beneficiaries, but each beneficiary will choose the programme that best suits them according to their specific knowledge, skills and preferences),
- (d) certification of both basic ICT skills (horizontal training programme) and specialised vocational skills (specialised training programme), and
- (e) 200 hours of practical work experience.

**The interventions/actions will have nationwide coverage in order to involve young people from the target group from all 13 Regions of the country.**

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

<sup>9</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. **If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate**, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial.

The service is entrusted to the National Confederation of Persons with Disabilities as State aid **in the form of public service compensation** in accordance with Article 2(1)(c) of Commission Decision 2012/21/EU 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.

This is a **service of general economic interest serving social needs**, as the provision of continuing vocational training services to facilitate access by the unemployed to the labour market is a service that the State must provide to citizens to tackle unemployment and strengthen social cohesion. However, it is a social service provided free of charge to the public if it targets young people with disabilities and/or chronic conditions and is aimed at all beneficiaries under the same conditions, free of charge and without payment, is in the interest of society as a whole, because it contributes to strengthening social cohesion, and does not financially benefit the implementing body.

**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 SGEI **has a duration of thirty (30) months**

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

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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.

The compensation relates to all costs incurred in the implementation of the SGEI provided (**EUR 21 059 934**).

Since the action is financed under 2014-2020 Partnership Agreement OP ‘Human Resources Development, Education and Lifelong Learning’, the verification body for avoiding overcompensation is the competent unit of the Managing Authority of the OP for Human Resources Development, Education and Lifelong Learning after implementing the Management and Control System procedures (Decision No 137675/EYΘY 1016/19.12.2018 (GG II 5968), replacing Ministerial Decision No 110427/EYΘY/1020/20.10.2016 (GG II 3521) on the National Rules on the Eligibility of Expenditure – Checks on the legality of public contracts for 2014-2020 Partnership Agreement actions (Ministerial Decision on the Management System)).

The parameters to be checked will be the services provided and their cost through the following procedures:

- Prior approval of tender documents (when required).
- Pre-approval of contracts (when required).
- Administrative checks on expenditure and deliverables of the service/action,
- On-site inspections.
- Completion of service/action.

The determination of the compensation of the SGEI follows the Communication from the Commission 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 (2012/C 8/02);

<b>Typical arrangements for avoiding and repaying any overcompensation.</b>
<p>The procedures provided for by the MCS (Decision No 137675/EYΘY 1016/19.12.2018 (GG II 5968) replacing Ministerial Decision No 110427/EYΘY/1020/20.10.2016 (GG II 3521) on the National Rules on the Eligibility of Expenditure – Checks on the legality of public contracts for 2014-2020 Partnership Agreement actions (Ministerial Decision on the Management System)) constitute a check on the implementation of the physical and financial scope of the service/action in accordance with the inclusion decision, and the report documenting the SGEI, which forms an integral part of it, and through which overcompensation of the SGEI is checked and prevented.</p> <p>The mechanism for recovering overcompensation (if overcompensation is discovered as a result of the checks referred to above) is that laid down in the MCS ((Decision No 137675/EYΘY 1016/19.12.2018 (GG II 5968) replacing Ministerial Decision No 110427/EYΘY/1020/20.10.2016 (GG II 3521) on the National Rules on the Eligibility of Expenditure – Checks on the legality of public contracts for 2014-2020 Partnership Agreement actions (Ministerial Decision on the Management System)).</p>
<p>A short explanation of how the <b>transparency requirements</b> (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>In accordance with the entrustment act (decision to include the action in the OP), the SGEI provider undertakes the following publicity obligations:</p> <ul style="list-style-type: none"> <li>(i) To accept inclusion of the action in the list of OP actions which is published by the OP Managing Authority on the website <a href="http://www.espa.gr">www.espa.gr</a>, in accordance with Article 115 and Annex XII to Regulation (EU) No 1303/2013, stating: the name of the beneficiary and the action, a summary of the action, the start date and end date, total eligible expenditure, co-financing rate, postal code or other appropriate location indicator, country, and name of category of intervention for the action.</li> <li>(ii) To adopt all the information measures provided for in Annex XII to Regulation (EU) No 1303/2013, and in particular by: <ul style="list-style-type: none"> <li>- operating a website on which details of the action are posted, such as a short description of the action, proportionate to the level of support, as well as its aims and results, highlighting the financial support from the Union;</li> <li>- placing posters with information on the action, for actions which do not come under the obligation to put up plaques or billboards;</li> <li>- providing information for the participants in actions co-financed by the ESF, and where appropriate by the ERDF or Cohesion Fund, relating to co-financing by the ESF, or the ERDF or CF, and implementation in the framework of the Operational Programme. This information is provided in every document or other certificate used during implementation of the operation or produced in that context;</li> <li>- ensuring that the participants in actions implemented within the framework of the Youth Employment Initiative (YEI) are specifically informed about the support for the YEI which is provided by ESF resources and the specific funds for the YEI. Any document relating to the implementation of an action and issued for the public or for</li> </ul> </li> </ul>

participants, including an attendance or other certificate, shall include a statement to the effect that the action was supported under the YEI.

In addition, the administrative documents of the action (inclusion decision, amendments, invitation to beneficiaries) are also published on the website of the MA of the OP 'Human Resources Development, Education and Lifelong Learning' [www.empedu.gov.gr](http://www.empedu.gov.gr).

**Amount of aid granted**

**Total amount of aid granted (in EUR millions)**<sup>10</sup>. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)

<b>2020</b>	<b>2021</b>
<b>0</b>	<b>0.077</b>

<sup>10</sup> As stipulated in Article 9(b) of the 2012 SGEI Decision.

## **B1b ORGANISATION: ARCADIA Professional Chamber, CLLD (Community Led Local Development)**

### **Clear and comprehensive description of how the respective services are organised in your Member State<sup>11</sup>**

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.

Public education organised within the national educational system funded and supervised by the State may be considered as a non-economic activity.

The non-economic nature of public education is in principle not affected by the fact that pupils or their parents sometimes have to pay tuition or enrolment fees which contribute to the operating expenses of the system. Such financial contributions often only cover a fraction of the true costs of the service and can thus not be considered as remuneration for the service provided. They therefore do not alter the non-economic nature of a general education service predominantly funded by the public purse.

These principles can cover public educational services such as vocational training, private and public primary schools and kindergartens, secondary teaching activities in universities and the provision of education in universities. The same principles can be applied to certain cultural services, such as public libraries;

e.g. financing of infrastructure and operation of public schools, funding of public universities to carry out their core educational work.

In the context of the above, the services provided as part of the SGEI are services that exhibit special characteristics as compared with those of other economic activities.

Their results are in the general public interest as they help address the serious social problem of unemployment, access to and reintegration into the labour market and maintain social cohesion in the CLLD intervention areas.

These services provide comprehensive support to unemployed people through a network of training and certification actions, which cover various additional needs they may have. These are important services provided directly to the unemployed, without incurring any financial burden, promoting social cohesion in order to facilitate their social integration and safeguard their fundamental rights. For these reasons they constitute social services of general interest (SSGI) of an economic nature, which constitute SGEIs.

The SGEI provider, the Arcadia Professional Chamber, is entitled under the legislation on Professional Chambers (Law 4497) to carry out activities to implement all forms of co-financed programmes, and may take initiatives to educate and train technical professionals, and promote new production processes, support development actions and business activities, and promote business innovation and foreign trade/exports.

The services are provided through two subprojects:

Subproject 1, which is implemented using the own resources procedure, includes the cost of the following services:

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<sup>11</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. **If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate**, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial.

Coordination, management, monitoring of the action and support measures to attract unemployed beneficiaries – publicity campaigns

Selection of beneficiaries

Payment of education allowances

The costs to be incurred under the own-resources subproject are provided for by the relevant call for tender and the provisions of Article 68(b) of Regulation (EU) No 1303/2013 and Decision No 137675/EYØY/1016/19-12-2018 (GG II 5968/31-12-2018) of the Deputy Minister for the Economy and Development, as in force.

Furthermore, the costs relating to the payment of the education allowance are not subject to any deduction, nor shall the SGEI provider receive any advantage of any kind, including any reduction in its costs inherent in operating under normal conditions, without taking on this subproject. In order to achieve this objective, the SGEI provider must take measures which can be checked by the competent authorities, in particular:

- \* It must create and maintain a separate account in its accounting system in order to exclude any possible own use of the amount received for the payment of the education allowance;
- \* It must not rent any space which it will charge to the action in order to pay the education allowance;
- \* It must not purchase equipment or software to support the payment of the education allowance;
- \* For the implementation of the subproject, the cost of staff employed for the payment of the allowance is not eligible.

More generally, the SGEI provider must not derive any benefit from the funding in question.

Subproject 2 concerns the provision of vocational training and certification and is implemented in accordance with Law 4412/2016 by means of an open international public tendering procedure based on the initial cost set by the relevant call for tenders. This subproject will be implemented by a contractor offering the corresponding services on the market, and entrustment will be awarded by means of an open public tendering procedure in accordance with EU and national law.

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

**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.

**Not applicable**

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

**Not applicable**

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

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

Typical **arrangements 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 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).

**Not applicable**

**Amount of aid granted**

**Total amount of aid granted (in EUR millions)<sup>12</sup>.** This includes all aid granted in your territory, including aid granted by regional and local authorities. **(A+B+C)**

<b>2020</b>	<b>2021</b>
<i>1.4</i>	<b>0</b>

<sup>12</sup> As stipulated in Article 9(b) of the 2012 SGEI Decision.



### B1c ORGANISATION: Managing Authority of the OP for the South Aegean Region

Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the <b>contents of the services entrusted as SGEI</b> as clearly as possible.
<p>The Managing Authority of the OP for the Southern Aegean Region finances the following actions as SGEIs:</p> <ul style="list-style-type: none"> <li>➤ Upgrading qualifications and supporting the integration into the labour market of unemployed persons with low educational qualifications in the Regional Units of the Cyclades, with beneficiary the Professional Chamber of the Cyclades and a budget of EUR 394 144.00.</li> <li>➤ Upgrading qualifications and supporting the integration into the labour market of unemployed persons with low educational qualifications in the South Aegean Region, with beneficiary the Centre for Research and Development of the Holy Metropolis of Syros and a budget of EUR 592 190.00.</li> <li>➤ Upgrading qualifications and supporting the integration into the labour market of unemployed persons with low educational qualifications in the South Aegean Region, with beneficiary the South Aegean Region Development Company 'Energeiaki SA' and a budget of EUR 575 600.00.</li> <li>➤ Upgrading qualifications and supporting the integration into the labour market of unemployed persons in the South Aegean Region, with beneficiary the Centre for Research and Development of the Holy Metropolis of Syros and a budget of EUR 693 734.80.</li> </ul> <p>Actions:</p> <ul style="list-style-type: none"> <li>➤ Preparing beneficiaries/unemployed persons registered with the National Employment Organisation (OAED), aged 29-64, mainly with compulsory and secondary education, to supplement and enhance their knowledge and basic skills and to upgrade specific professional skills, leading to certification and acquisition of qualifications;</li> <li>➤ Enhancing the employment opportunities of beneficiaries.</li> </ul> <p>The above actions are pursued through training, certification and counselling services.</p>
Explanation of the (typical) <b>forms of entrustment</b> . If standardised templates for entrustments are used for a certain sector, please attach them.
Training, certification and counselling services are to be entrusted through an international open tendering procedure. Training allowances will be paid to beneficiaries by the contractor by a direct labour arrangement (in house). Coordination of the operation, publicity and selection of beneficiaries will be carried out by the contractor in house.
<b>Average duration of the entrustment (in years)</b> and the proportion of entrustments that are <b>longer than 10 years</b> (in %) per sector. Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.
The maximum duration of the entrustment is 18 months.
Explanation whether (typically) <b>exclusive or special rights</b> are assigned to the undertakings.
Which <b>aid instruments</b> have been used (direct subsidies, guarantees, etc.)?
Typical <b>compensation mechanism</b> as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.

The costs of the SGEI are calculated based on Circular No 79732/27.07.2020 of the Special Service for the Coordination and Monitoring of European Social Fund Actions (EYSEKT) 'Framework of quality standards for the planning and implementation of continuing vocational training programs co-financed by the ESF' as well as historical data on the cost of corresponding market-based services, while the revenue generated will be registered as revenue from the grant.

The categories of revenue and costs by type of service of the SGEI provided are set out below. The SGEI documentation report accompanying the inclusion decision provides detailed and substantiated cost data.

- Individual career guidance counselling, individual monitoring/support
- Training
- Certification
- Payment of allowances
- Attraction and selection of beneficiaries – payment of allowances

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

The control body for ensuring avoidance of overcompensation is the competent Unit of the Managing Authority of the OP for the South Aegean Region; control is carried out by implementing the procedures of the MCS (Ministerial Decision No 110427/EYΘY/1020 (GG II 3521/1.11.2016), as amended).

The following are checked during the control procedure:

- Content and duration of the SGEI
- Geographical area where the service is provided
- Amount of compensation

Control of compensation will be carried out through the following procedures:

- Prior approval of tender documents (when required). The SGEI provider submits the draft tender documents to the competent unit of the MA of the OP for the South Aegean Region 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.
- Pre-approval of contracts (when required). The provider submits the draft contract to Unit B of the MA of the OP for the South Aegean Region to:

(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;

(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.

- The administrative checks on expenditure and deliverables of the service/action, as described at the individual stages of description of the service in this report. The service provider submits their deliverables as an annex to the Statement of Expenditure Sheet. The purpose of this procedure is for the competent Unit B of the MA 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.

- On-site inspections. The purpose of the procedure is for the competent unit of the MA 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.
- Completion of the service. The purpose of the procedure is for the competent unit of the MA to confirm the completion and delivery of the SGEI in accordance with the terms and conditions of its approval.

#### Procedures to verify the level of compensation

The above procedures are to check implementation of the physical and financial scope of the service/action 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 137675/EYΘY/1016 – GG II 5968/31.12.2018). 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 137675/EYΘY/1016 – GG II 5968/31.12.2018). 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 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).

#### Amount of aid granted

**Total amount of aid granted (in EUR millions)<sup>6</sup>.** This includes all aid granted in your territory, including aid granted by regional and local authorities. **(A+B+C)**

2020	2021
0.009	0.376

## B1d ORGANISATION: Regional Unit of Central Macedonia

<b>Clear and comprehensive description of how the respective services are organised in your Member State<sup>13</sup></b>
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the <b>contents of the services entrusted as SGEI</b> as clearly as possible.
<b>Development of the qualifications of the long-term unemployed with low educational qualifications:</b> 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.
<b>Counselling and training for the unemployed in the RIS3 manufacturing sectors in the Region of Central Macedonia:</b> Vocational counselling, vocational training, certification of knowledge and skills and specialised entrepreneurship counselling for unemployed persons.
<b>Upgrading of qualifications for the long-term unemployed in the Metropolitan Unit of Thessaloniki in specialisations in the hotel sector:</b> Programmes for upgrading qualifications and enhancing the work experience of the long-term unemployed in tourism specialisations through counselling, training and certification actions.
<b>Combined action to upgrade professional qualifications for long-term unemployed scientists to boost innovation and foreign trade/exports of SMEs in the intervention areas of the Thessaloniki Sustainable Urban Development (SUD) Strategy:</b> Counselling, training, certification, with priority given to young, long-term unemployed people living below the poverty line in the SUD Strategy area of the Metropolitan Unit of Thessaloniki.
<b>Actions for retraining and professional integration in sustainable sectors of manufacturing, services and tourism for the long-term unemployed in the Thessaloniki SUD Strategy intervention area</b> Career guidance, specialised training (in subjects in sustainable sectors such as manufacturing, services and tourism), certification and entrepreneurship advice, for 210 long-term unemployed persons living in the Thessaloniki SUD Strategy intervention area.
<b>Upgrading of qualifications and acquisition of new skills of unemployed scientists of polytechnic and technology schools and IT schools in the ICT fields for engineering project quality, in the SUD Strategy area of the Metropolitan Unit of Thessaloniki:</b> Career guidance, specialised training, certification and small business advice for 260 long-term unemployed scientists from polytechnic and technology schools and IT schools in the ICT fields for engineering project quality, living in the Thessaloniki SUD Strategy intervention area.
Explanation of the (typical) <b>forms of entrustment</b> . If standardised templates for entrustments are used for a certain sector, please attach them.
<b>Development of the qualifications of the long-term unemployed with low educational qualifications:</b> Entrustment was awarded by the Decision to include the action in the OP for

<sup>13</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. **If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate**, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial.

the Region of Central Macedonia, ref. 1578/30.3.2018.

**Counselling and training for the unemployed in the RIS3 manufacturing sectors in the Region of Central Macedonia:** Entrustment was awarded by the Decision to include the action in the OP for the Region of Central Macedonia, ref. 1588/30.3.2018.

**Upgrading of qualifications for the long-term unemployed in the Metropolitan Unit of Thessaloniki in specialisations in the hotel sector:** Entrustment was awarded by the Decision to include the action in the OP for the Region of Central Macedonia, ref. 1879/28.3.2019.

**Combined action to upgrade professional qualifications for long-term unemployed scientists to boost innovation and foreign trade/exports of SMEs in the intervention areas of the Thessaloniki Sustainable Urban Development (SUD) Strategy:** Entrustment was awarded by the Decision to include the action in the OP for the Region of Central Macedonia, ref. 1880/28.3.2019.

**Actions for retraining and professional integration in sustainable sectors of manufacturing, services and tourism for the long-term unemployed in the Thessaloniki SUD Strategy intervention area:** Entrustment was awarded by the Decision to include the action in the OP for the Region of Central Macedonia, ref. 1877/28.3.2019.

**Upgrading of qualifications and acquisition of new skills of unemployed scientists of polytechnic and technology schools and IT schools in the ICT fields for engineering project quality, in the SUD Strategy area of the Metropolitan Unit of Thessaloniki:** Entrustment was awarded by the Decision to include the action in the OP for the Region of Central Macedonia, ref. 1878/28.3.2019.

**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 all the above services will be 2 years.

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

**Development of the qualifications of the long-term unemployed with low educational qualifications:** The designated service provider is the CENTRAL UNION OF PROFESSIONAL CHAMBERS OF GREECE.

**Counselling and training for the unemployed in the RIS3 manufacturing sectors in the Region of Central Macedonia:** The designated service provider is the ASSOCIATION OF INDUSTRIES OF GREECE (SVE)

**Upgrading of qualifications for the long-term unemployed in the Metropolitan Unit of Thessaloniki in specialisations in the hotel sector:** The designated service provider is the PANHELLENIC FEDERATION OF HOTELIERS

**Combined action to upgrade professional qualifications for long-term unemployed scientists to boost innovation and foreign trade/exports of SMEs in the intervention areas of the Thessaloniki Sustainable Urban Development (SUD) Strategy:** The designated service provider is the EXPORTERS ASSOCIATION

**Actions for retraining and professional integration in sustainable sectors of manufacturing, services and tourism for the long-term unemployed in the Thessaloniki SUD Strategy intervention area:** The designated service provider is the ASSOCIATION



OF INDUSTRIES OF GREECE (SVE)
<b>Upgrading of qualifications and acquisition of new skills of unemployed scientists of polytechnic and technology schools and IT schools in the ICT fields for engineering project quality, in the SUD Strategy area of the Metropolitan Unit of Thessaloniki:</b> The designated service provider is the TECHNICAL CHAMBER OF GREECE – CENTRAL MACEDONIA SECTION
Which <b>aid instruments</b> have been used (direct subsidies, guarantees, etc.)?
Direct subsidy
Typical <b>compensation mechanism</b> as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.
Financial analysis to determine the compensation
Typical <b>arrangements for avoiding and repaying any overcompensation.</b>
<p>8. MECHANISM FOR MONITORING OF OVERCOMPENSATION</p> <p>8.1. 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 No 110427/EYΘY/1020 (GG II 3521/1.11.2016), as amended).</p> <p>8.2. Control parameters</p> <p>The following are checked during the control procedure:</p> <ul style="list-style-type: none"> <li>• Content and duration of the SGEI</li> <li>• Geographical area where the service is provided</li> <li>• Amount of compensation</li> </ul> <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> <p>3. The administrative checks on expenditure and deliverables of the service/action, 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 action has been delivered, in accordance with the conditions and obligations assumed by the beneficiary to implement the SGEI on the basis of this report.</p> <p>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</p>

SGEI, where the above cannot be verified administratively.

5. Completion of service/action. 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.

8.3 Procedures to verify the level of compensation

The above procedures are to check implementation of the physical and financial scope of the service/action 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/EYΘY/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.

8.4 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/EYΘY/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 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).

<b>Amount of aid granted</b>		
<b>Total amount of aid granted (in EUR millions)<sup>14</sup>. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)</b>		
	<b>2020</b>	<b>2021</b>
Development of the qualifications of the long-term unemployed with low educational qualifications	<b>0.454</b>	<b>0.00</b>
Counselling and training for the unemployed in the RIS3 manufacturing sectors in the Region of Central Macedonia	<b>1.508</b>	<b>0.021</b>
Upgrading of qualifications for the long-term unemployed in the Metropolitan Unit of Thessaloniki in specialisations in the hotel sector	<b>0.00</b>	<b>0.170</b>
Combined action to upgrade professional qualifications for long-term unemployed scientists to	<b>0.00</b>	<b>1.078</b>

<sup>14</sup> As stipulated in Article 9(b) of the 2012 SGEI Decision.

boost innovation and foreign trade/exports of SMEs in the intervention areas of the Thessaloniki Sustainable Urban Development (SUD) Strategy		
Actions for retraining and professional integration in sustainable sectors of manufacturing, services and tourism for the long-term unemployed in the Thessaloniki SUD Strategy intervention area	<b>0.035</b>	<b>0.887</b>
Upgrading of qualifications and acquisition of new skills of unemployed scientists of polytechnic and technology schools and IT schools in the ICT fields for engineering project quality, in the SUD Strategy area of the Metropolitan Unit of Thessaloniki	<b>0.00</b>	<b>0.038</b>
	<b>1.997</b>	<b>2.194</b>



## B2. CARE AND SOCIAL INCLUSION OF VULNERABLE GROUPS

### B2a ORGANISATION: Ministry of Labour (Panhellenic Federation of Associations of Parents and Guardians of Persons with Disabilities)

<b>Clear and comprehensive description of how the respective services are organised in your Member State</b>
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the <b>contents of the services entrusted as SGEI</b> as clearly as possible.
The ‘Camping for the Disabled’ programme is implemented pursuant to the provisions of Article 57(2)(c) and (e) 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) <b>forms of entrustment</b> . If standardised templates for entrustments are used for a certain sector, please attach them.
By joint decision of the Minister for Labour, and Social Affairs and the Minister for Finance, the special certified bodies referred to in Article 5 of Law 2646/1988 may be entrusted with providing support services for the organisation and operation of camps for vulnerable groups of the population within or in addition to the public programme.
<b>Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector.</b> 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 takes place every year from July to September.
Explanation whether (typically) <b>exclusive or special rights</b> are assigned to the undertakings.
-
Which aid instruments have been used (direct subsidies, grants, guarantees, etc.)?
Grant: To run the ‘Camping for the Disabled’ programme, appropriations are entered in the budget of the Ministry of Labour and Social Affairs and used to finance the body (the Panhellenic Federation of Associations of Parents and Guardians of Persons with Disabilities) responsible for organising and running the camps, in accordance with the Joint Decision of the Minister for Labour and Social Affairs and the Minister for Finance.
Explanation of the (typical) <b>compensation mechanism</b> as regards the respective services and whether a methodology based on cost allocation or the net avoided cost methodology is used.
The body to which the programme is entrusted is financed for the total number of beneficiaries of the programme who are hosted, on the basis of a daily subsistence allowance per person, the amount of which has been defined and fixed, bearing in mind that each beneficiary was hosted for a total of seven days.
Explanation of the (typical) <b>arrangements for avoiding and repaying (recovering) any overcompensation</b> .
<b>A short explanation of how the transparency requirements</b> (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.

Amounts of aid granted

**Total amount of aid granted** (in EUR millions). This includes all aid paid in your territory, including aid paid by regional and local authorities for the years 2020 and 2021.

2020	2021
0.390	0.354

**Additional quantitative information** (e.g. number of beneficiaries per sector, average aid amount, size of undertakings)

**2020:** Number of beneficiaries: 1 131 people

**2021:** Number of beneficiaries: 1 175 people

## B2b ORGANISATION: Regional Unit of Central Macedonia

<b>Clear and comprehensive description of how the respective services are organised in your Member State<sup>15</sup></b>
Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the <b>contents of the services entrusted as SGEI</b> as clearly as possible.
<b>Promoting the employment of people from vulnerable social groups:</b> 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.
<b>Integrated service for combating discrimination and promoting social integration of people with disabilities and people with chronic conditions and their families living in the Region of Central Macedonia:</b> - Information/awareness-raising to promote the rights-based approach to disability – Development of support tools – Reproduction and accessibility of support material – Counselling, vocational training, certification and promotion of employment – Evaluation of the implementation of the action – Management – Publicity
Explanation of the (typical) <b>forms of entrustment</b> . If standardised templates for entrustments are used for a certain sector, please attach them.
<b>Promoting the employment of people from vulnerable social groups:</b> Entrustment was awarded by the Decision to include the action in the OP for the Region of Central Macedonia, ref. 486/5.2.2018.
<b>Integrated service for combating discrimination and promoting social integration of people with disabilities and people with chronic conditions and their families living in the Region of Central Macedonia:</b> Entrustment was awarded by the Decision to include the action in the OP for the Region of Central Macedonia, ref. 2382/18.5.2018.
<b>Average duration of the entrustment (in years)</b> and the proportion of entrustments that are <b>longer than 10 years</b> (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 all the above services will be 2 years.
Explanation whether (typically) <b>exclusive or special rights</b> are assigned to the undertakings.
<b>Promoting the employment of people from vulnerable social groups:</b> The designated service provider is the CENTRAL UNION OF PROFESSIONAL CHAMBERS OF GREECE
<b>Integrated service for combating discrimination and promoting social integration of people with disabilities and people with chronic conditions and their families living in the Region of Central Macedonia:</b> The designated service provider is the NATIONAL CONFEDERATION OF PERSONS WITH DISABILITIES
Which <b>aid instruments</b> have been used (direct subsidies, guarantees, etc.)?
Direct subsidy
Typical <b>compensation mechanism</b> as regards the respective services and whether a

<sup>15</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. **If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate**, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial.

methodology based on cost allocation or the net avoided cost methodology is used.

Financial analysis to determine the compensation

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

**8. MECHANISM FOR MONITORING OVERCOMPENSATION**

**8.1. Designation of a control body to avoid overcompensation**

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 No 110427/EYΘY/1020 (GG II 3521/1.11.2016), as amended).

**8.2. Control parameters**

The following are checked during the control procedure:

- Content and duration of the SGEI
- Geographical area where the service is provided
- Amount of compensation

Control of compensation will be carried out through the following procedures:

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.

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:

(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;

(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.

3. The administrative checks on expenditure and deliverables of the service/action, 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 the procedure is for Unit B of the Managing Authority of the OP for the Region of Central Macedonia to make sure that the declared expenditure has been incurred and the physical scope of the action 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/action. 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.

**8.3 Procedures to verify the level of compensation**

The above procedures are to check implementation of the physical and financial scope of the service/action 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/EYΘY/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.

#### 8.4 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/EYΘY/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 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).

#### Amount of aid granted

**Total amount of aid granted (in EUR millions)<sup>16</sup>.** This includes all aid granted in your territory, including aid granted by regional and local authorities. **(A+B+C)**

	2020	2021
Promoting the employment of people from vulnerable social groups:	0.326	0.00
Integrated service for combating discrimination and promoting social integration of people with disabilities and people with chronic conditions and their families living in the Region of Central Macedonia:	0.240	0.00
	0.566	0

<sup>16</sup> As stipulated in Article 9(b) of the 2012 SGEI Decision.

### **3. APPLICABILITY OF THE 2012 SGEI FRAMEWORK**

## A. ENERGY

Ministerial Decision No 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 No 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 No 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 97/2022 (GG II 900/2022) 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 2022, 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 No 2014/536/EU to isolated micro isolated systems. 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 Public Power Corporation (PPC) for the supply to consumers on micro isolated systems and small isolated systems.'

Furthermore, 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.'

Concise description: '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. 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').

**Clear and comprehensive description of how the respective services are organised in your Member State<sup>17</sup>**

<sup>17</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial. Since cases falling under the SGEI Framework will be limited in number, the Commission expects a detailed description of each concrete measure.



<p>Explanation of what kind of services in the respective sector have been defined as SGEI in your Member State. Please list the <b>contents of the services entrusted as SGEI</b> as clearly as possible.</p>
<p><b>‘Uniform charging of electricity to consumers in the Interconnected System and the Non-Interconnected Islands’</b> 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 micro isolated systems at the same tariffs, per consumer category, to those of the Interconnected System. This SGI, as a particular form of price regulation, aims to address the very specific geographic and economic situation of the NII. 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:</p> <p>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. 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.</p> <p>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><b>Average duration of the entrustment (in years)</b> and the proportion of entrustments that are <b>longer than 10 years</b> (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>Please note that the period of validity of the scheme approved by the Commission in its above-mentioned SGEI Decision expired on 19 February 2019. However, as there is still a</p>

need to grant this State aid, Greece has notified a request to prolong the scheme (SA 62515). The RAE, as the competent authority for approval of the compensation for the SGEI in question, for the period after 19 February 2019, is awaiting completion of the procedure for the Commission's approval decision.

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

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 systems and micro isolated systems, 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.

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 micro isolated micro systems 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.

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.

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.

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

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.'

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 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 No 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 and whether a methodology based on cost allocation or the net avoided cost methodology is used.

#### RAE Decision No 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



#### 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 No 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 days, 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 No 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.:

n

$XE\Phi = \sum_{I=1} XE\Phi I$

I=1

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:

[http://www.rae.gr/site/categories\\_new/global\\_regulation/global\\_national/global\\_national\\_laws.csp?power=electricity&lawfek=&type=&lawcode=&low\\_text=&btn\\_search=%CE%91%CE%BD%CE%B1%CE%B6%CE%AE%CF%84%CE%B7%CF%83%CE%B7](http://www.rae.gr/site/categories_new/global_regulation/global_national/global_national_laws.csp?power=electricity&lawfek=&type=&lawcode=&low_text=&btn_search=%CE%91%CE%BD%CE%B1%CE%B6%CE%AE%CF%84%CE%B7%CF%83%CE%B7).

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](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/faq/electricity.csp](http://www.rae.gr/site/categories_new/consumers/faq/electricity.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 ( <a href="http://www.rae.gr/site/categories_new/statesub/elec/yko.csp">http://www.rae.gr/site/categories_new/statesub/elec/yko.csp</a> ).	
<b>Amount of aid granted</b>	
<b>Total amount of aid granted (in EUR millions)<sup>18</sup>. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)</b>	
<b>2020</b>	<b>2021</b>
EUR 649.3 million (estimated on the basis of preliminary payments of the Hellenic Electricity Distribution Network Operator DEDDIE)	For 2021, the SGI_NII operator (DEDDIE) has not completed its evaluation and audit of the accounting clearances and its recommendation to the RAE is expected.

<sup>18</sup> As stipulated in Paragraph 62(b) of the 2012 SGEI Framework.

## B. POSTAL SERVICES

### **Clear and comprehensive description of how the respective services are organised in your Member State<sup>19</sup>**

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 Article 21 of 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 in Ministerial Decision No 41252/2021 (GG II 5479).

The universal service includes at least the following individual services:

1. The universal postal service is provided to users of postal services, irrespective of where they are located in Greece, once each working day at an affordable price and includes the following services:

(a) Collection, transport, sorting and distribution to the home or registered office or appropriate premises of any natural or legal person of all postal items weighing up to two (2) kilograms.

In addition to items of correspondence, these postal items include, by way of example, letters, postcards, bills, all forms of printed matter, reply envelopes, cards, bound items, samples of goods, data storage media, addressed advertising mail, books, catalogues, newspapers and magazines.

(b) Collection, transport, sorting and distribution to the home or registered office or appropriate premises of any natural or legal person of postal parcels weighing up to twenty (20) kilograms containing goods with or without commercial value.

(c) Registered mail service.

(d) Insured mail service.

(e) The possibility to track all postal items of the universal postal service.

The postal tracking service shall include at least: (i) one (1) scan of the postal item when deposited in a branch, rural distributor, agency or box in the sorting centre; (ii) one (1) scan when the postal item is delivered to the address of the recipient. The tracking service may be offered with a certificate of delivery of the postal item at the address of the recipient, which will be available by electronic means.

(F) The possibility of making available an electronic stamp.

2. The universal service does not include any of the above services if the prices and/or

<sup>19</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial. Since cases falling under the SGEI Framework will be limited in number, the Commission expects a detailed description of each concrete measure.

conditions under which they are offered by the universal service provider (USP) have been subject to:

- (a) individual negotiation, or
- (b) a commercial agreement, or
- (c) a specific tender in the context of competitive procedures or other types of awards.

The universal postal service comprises services within Greece as well as cross-border postal services.

Services falling within the universal service shall be determined on the basis of users' needs, technological developments and the development of market forces. Any change in the content of the universal service should take account of the necessary adjustment period of the universal service provider and/or the recovery of potential costs. A decision of the Minister for Digital Governance, following an opinion of the Hellenic Telecommunications and Post Commission (EETT), shall define the services covered by the universal service and may adopt special terms and conditions for the provision of postal services for blind and partially sighted persons. The universal service shall not include any services for which the prices and/or conditions at which they are offered have been individually negotiated or commercially agreed or offered as part of competitive procedures or other types of entrustment to the universal service provider. The universal service provider must reflect these services separately in its cost system, which shall be approved by EETT.

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

Article 8(4) 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, 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 Hellenic Post (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. Receipt of bill payments on behalf of 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’, and 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 Infrastructure, Transport and Networks.

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) <b>exclusive or special rights</b> 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 <b>aid instruments</b> have been used (direct subsidies, guarantees, etc.)?
For the period 2020-2021 under consideration, direct State aid has been paid to ELTA for the provision of the universal postal service for the years 2013-2021, as follows:  For 2020: 15 000 000.00 For 2021: 15 000 000.00 For 2019: 17 508 396.00 For 2013-2018: 149 120 993.00  The amount of additional compensation granted to ELTA for provision of the universal postal service for the years 2013-2018 by way of Ministerial Decision No 35772/2020 (GG II 5648) issued on 21 December 2020 is EUR 149 120 993. The argument put to the Commission by the Greek authorities regarding the payment of this amount in response to the Commission’s decision of 10 March 2022 to open the formal investigation procedure provided for in Article 108(2) TFEU (SA.57538) can be summarised as follows:  - The payment of the amount of EUR 149 120 993 to ELTA constitutes aid which is compatible with the SGEI Framework and therefore with the internal market, because:  o ELTA has been entrusted with the provision of an SGEI and therefore had a legal right to such compensation. The entrustment acts provide that ELTA was entitled to receive full compensation for the universal service obligation, which could exceed EUR 15 million per year.  o The amount of SGEI compensation paid to ELTA does not exceed what is necessary to cover the costs necessary to discharge the SGEI obligation.  o Such compensation does not exceed what is necessary to cover the costs associated with the discharge of the public service obligation, including a reasonable profit; and  o ELTA complies with the transparency requirements (also set out in Directive 2006/111/EC), given that:  ▪ first, ELTA keeps separate accounts for SGEI and non-SGEI activities, and  ▪ second, the calculation of the SGEI compensation was based on the same

methodology as examined by the Commission and found compatible with the internal market in its 2014 decision. The only difference is that the compensation calculated for the period 2013-2018 was based on an improved dataset, and most importantly on cost accounting data from ELTA's cost accounting system, which has been approved by the Hellenic Telecommunications and Post Commission (EETT).

Accordingly, the amount of EUR 17 508 396.00 was paid in addition to the amount of EUR 15 000 000.00 granted in 2019 and stated in the 2020 SGEI Report.

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 2013-2018, 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. If the net cost of providing the universal service, verified by the Hellenic Telecommunications and Post Commission (EETT), constitutes an unfair financial burden in accordance with Part B of Annex I, this is fully compensated from the State budget. The above compensation takes into account the amount of EUR 15 000 000.00 paid from the State budget to the universal service provider (USP) in the years 2013 to 2021 as an advance on the total annual costs, verified by EETT, of providing the universal service.
2. The USP may continue to receive an advance of up to EUR 15 000 000.00, at its request to the Secretariat-General for Telecommunications and Postal Services of the Ministry of Digital Governance, even before EETT has verified the net cost of providing the universal postal service. The USP is entitled to this advance payment, provided that, on the basis of the cost/financial data on the provision of the universal postal service during the first quarter of the current year, in conjunction with the annual net cost of providing the universal postal service for the previous five verified years, EETT expects that the relevant cost will exceed



the requested amount for the current year. If the request is submitted before the end of the first quarter of the year, then EETT shall take into account the cost/financial data for the provision of the universal postal service of the previous year.

3. The amounts referred to in paragraphs 1 and 2 are paid directly to the USP. A joint decision of the Minister for Finance and the Minister for Digital Governance determines the amounts to be paid and the timing and procedure for payment, the supporting documents required and any other necessary details.

4. The provision of additional services beyond the universal service obligations, such as the distribution of pensions and money orders, may be financed in accordance with EU State aid rules.

**Typical arrangements for avoiding and repaying 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 the 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 (USP), 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 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).

Under paragraph 60 of the SGEI Framework, for each SGEI compensation falling within the scope of the Framework, Greece must publish the following information either on the internet or by other appropriate means: (a) the results of the public consultation or other appropriate instruments referred to in paragraph 14 of the SGEI Framework; (b) the content and duration of the public service obligations; (c) the undertakings and, where applicable, the territory concerned; (d) the amounts of aid granted to the undertaking on a yearly basis.

The content of the universal service provided by ELTA is set out in the relevant provisions: (i) Law 4053/2012, (ii) the Management Agreement between the Hellenic Republic and ELTA of 8 November 2010 ('Contract 2010'), (iii) Decision No 697/129/18.07.2013 (GG II 2016) of the Hellenic Telecommunications and Post Commission (EETT) and (iv) the Agreement between the Hellenic Republic and ELTA on the award of universal services of 19 April 2017 ('Contract 2017'). Law 4053/2012 stipulates that ELTA remains a universal service provider until 31 December 2028. Article 2 of Contract 2010 and Contract 2017



clarifies that ELTA is the universal service provider and that the relevant geographical area for the provision of the above service is the entire territory of Greece. The content and quality requirements of the universal service are laid down in Law 4053/2012, Contract 2017, Contract 2010 and Ministerial Decisions No 7728/190 and No 72142/1663. The amount of compensation granted is laid down in various ministerial decisions. The texts of these legal instruments are publicly available, with the exception of Contract 2017.

**Amount of aid granted**

**Total amount of aid granted (in EUR millions)<sup>20</sup>. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)**

<b>2020</b>	<b>2021</b>
<b>179 121</b> (EUR 15 million for 2020, EUR 15 million for 2021 and 149 120 993 for the period 2013-2018, as explained above under ‘aid instruments’)	<b>17 508</b> (for 2019, as explained above under ‘aid instruments’)

<sup>20</sup> As stipulated in Paragraph 62(b) of the 2012 SGEI Framework.

#### 4. COMPLAINTS BY THIRD PARTIES

Please provide an overview of complaints by third parties, in particular litigation before national courts, regarding measures in scope of the 2012 SGEI Decision or 2012 SGEI Framework. Please be as specific as possible in your reply and include the sector for which you have received the complaints, the contents of the complaints and the possible follow-up by your authorities or the likely outcome of the court proceedings.

##### 1. ENERGY

Please note that the RAE decisions approving the compensation for the provision of the SGEI in question have been challenged only by PPC, which was also the sole provider of these services until 2018.

Specifically, PPC has challenged all the RAE decisions on the approval of the SGI compensation, claiming that the RAE either incorrectly applied the compensation calculation methodology or incorrectly interpreted the legislative framework for the provision of the service in question. It should be clarified that the RAE's decisions were initially challenged only before the administrative courts, on the basis of the case law in force at the time concerning their regulatory nature. In particular, given that the SGI compensation is paid by all electricity customers in Greece, the Authority's position, supported by the case law, was that the RAE's decisions approving the amount of compensation were addressed not only to PPC, which was the exclusive beneficiary, but also to a general, undefined circle of persons, namely all electricity consumers, who had to bear the costs of paying the compensation. On this basis, relevant data are provided:

- SGEI compensation for 2012 to 2013. Application for annulment No 3875/2014 by PPC against the RAE before the Council of State, seeking the annulment of RAE Decision No 356/2014

In this application, PPC challenged before Chamber IV of the Council of State the approval of compensation to cover the costs of providing an SGI for the years 2012 and 2013, complaining of incorrect application of the law.

PPC argued that the RAE issued its Decision No 356/2014 in accordance with the methodology of its Decision No 14/2014, but incorrectly applied it to such an extent that PPC ultimately suffered a loss of approximately EUR 51 million.

According to PPC, the Authority's error was that it failed to comply with the provisions of paragraph 2b of Decision No 14/2014 on the calculation of the Average Market Price (AMP) for the RES Interconnected System (MTA\_ΔΣΑΠΕ), considering it to be the same as the AMP for the Interconnected System (MTA\_ΔΣ).

The case was heard on 29 May 2018 and in its judgment 1682/2018 the Council of State dismissed the appeal, referring it to the Administrative Court of Appeal for a ruling as a substantive appeal. According to the Council of State, the contested decision did not adopt general measures to organise the functioning of the electricity market, nor did it regulate a category of legal relationships or a category of legal persons defined in a general and impersonal manner, with a number unspecified in advance. On the contrary, the contested measure concerns only the specific electricity suppliers which were known in advance at the time (in this case only PPC). Therefore, if the RAE's act is not of a regulatory nature, it is subject to a substantive appeal and must be referred to the Administrative Court of Appeal.

- SGEI Compensation for the years 2014, 2015, 2016 'Provisional compensation': Application for annulment No E3172/2017 by PPC against the RAE before the Council of

State, seeking the annulment of RAE Decision No 688/2017.

In this application, PPC challenged before Chamber IV of the Council of State the approval of provisional compensation to cover the costs of providing an SGI for the years 2014, 2015 and 2016, complaining as follows:

(a) RAE Decision No 688/2017 was adopted in application of the methodology provided for in RAE Decision No 14/2014. However, according to PPC, this decision had ceased to apply after the NII Code came into force. Once the NII Code had been adopted, calculation of the SGI compensation had to be based on its provisions. As the NII Code had entered into force, the compensation would have to be calculated on the basis of the model contract to which the Code refers, and the provisions of which have regulatory content.

(b) The adoption of RAE Decision No 688/2017 goes beyond the limits of the Authority's authorisation. The RAE approved provisional SGI compensation for the clearance of previous years, although the operator had not submitted provisional results. It does not follow from the provisions in force that the RAE had such powers.

(c) Finally, PPC argued (in the alternative) that the decision adopted did not correctly apply the methodology laid down by Decision No 14/2014, resulting in an incorrect technical assessment by the Administration.

The case was heard on 29 May 2018 and in its judgment 1683/2018 the Council of State dismissed the appeal, referring it to the Administrative Court of Appeal for a ruling as a substantive appeal. According to the Council of State, the contested decision did not adopt general measures to organise the functioning of the electricity market, nor did it regulate a category of legal relationships or a category of legal persons defined in a general and impersonal manner, with a number unspecified in advance. On the contrary, the contested measure concerns only the specific electricity suppliers which were known in advance at the time (including PPC). Therefore, if the RAE's act is not of a regulatory nature, it is subject to a substantive appeal and must be referred to the Administrative Court of Appeal.

- SGEI Compensation for the years 2014, 2015, 2016 'Provisional compensation': Appeal No ΠΠ386/12.02.2018 by PPC before the Athens Administrative Court of Appeal against the RAE, seeking annulment of RAE Decision No 688/2017 and RAE Decision No 1038/2017, following Council of State judgment 1683/2018.

In the above appeal, lodged in response to Council of State Decision No 1683/2018, PPC challenged before the Athens Administrative Court of Appeal the approval of the provisional compensation to cover the costs of providing universal services for the years 2014, 2015 and 2016, complaining as follows:

(a) RAE Decision No 688/2017 was adopted in application of the methodology provided for in RAE Decision No 14/2014. However, according to PPC, this decision had ceased to apply after the NII Code came into force. Once the NII Code had been adopted, calculation of the SGI compensation had to be based on its provisions. As the NII Code had entered into force, the compensation would have to be calculated on the basis of the model contract to which the Code refers, and the provisions of which have regulatory content.

(b) The adoption of RAE Decision No 688/2017 goes beyond the limits of the Authority's authorisation. The RAE approved provisional SGI compensation for the clearance of previous years, although the operator had not submitted provisional results. It does not follow from the provisions in force that the RAE had such powers.

(c) Finally, PPC argues (in the alternative) that the decision adopted did not correctly apply the methodology laid down by Decision No 14/2014, resulting in an incorrect technical

assessment by the Administration.

The appeal was heard on 9 June 2020 and in its judgment 190/2021 the Court dismissed the substantive appeal, holding that:

(a) The key reason for maintaining Methodology Decision 14/2014 is not only the adoption of the Code, as argued by PPC, but also the adoption of the Presidential Decree provided for in Article 55 of Law 4001/2011, which takes precedence over all the acts constituting the SGI mechanism. That Decree had not been adopted when RAE Decision No 688/2017 was drafted, so Methodology Decision No 14/2014 was still in force in the years in question.

(b) The decision approving compensation is not simply a matter of applying the Methodology formulae, i.e. a mathematical operation based on the data provided by the operator; rather, based on the Authority's abovementioned regulatory power, it involves a substantive judgment after evaluating and weighting the critical cost parameters and the available data on how those parameters are to be applied. Therefore, the Authority, within the framework of its responsibilities, carried out an audit of the cost elements brought to its attention by the Hellenic Electricity Distribution Network Operator (DEDDIE), as required by the provisions in force, and acted within the limits of its responsibilities.

(c) neither the principle of legal certainty, impartiality and predictability nor the principle of good administration have been infringed in any case, since the application of the Methodology, under RAE Decision No 688/2017, is based on data arising from the applicable regulatory provisions.

Please note that RAE Decision No 688/2017 approving provisional compensation for provision of SGIs in 2014, 2015 and 2016 was amended by RAE Decision No 200/2020 (GG II 509/19.2.2020), which approved additional compensation to cover the costs of providing SGIs in the non-interconnected islands (NII) over those years. RAE Decision No 200/2020 was not challenged.

- SGEI compensation 2017: Appeal No IIP943/2017 by PPC against the RAE before the Athens Administrative Court of Appeal, seeking annulment of RAE Decision No 1254/2017.

In this appeal, PPC challenged before the Athens Administrative Court of Appeal the approval of compensation to cover the costs of providing an SGI for 2017, complaining of incorrect application of the law.

PPC argued that the RAE issued its Decision No 1254/2014 in accordance with the methodology of its Decision No 14/2014, but incorrectly applied it to such an extent that ultimately the Administration's technical assessment is clearly wrong. According to PPC, the incorrect application resulted in a distorted calculation of the SGI compensation for 2017, to its detriment.

According to PPC, the Authority's error was that it failed to comply with the provisions of paragraph 2b of Decision No 14/2014 on the calculation of the Average Market Price (AMP) for the RES Interconnected System (MTA\_ΔΣΑΠΕ).

The appeal was not discussed because PPC withdrew, so the case did not proceed to judgment, pursuant to Article 142 of the Code of Administrative Procedure (decision ref. 66/14.04.2022).

Finally, for the sake of completeness, please note that the RAE issued Decision No 1019/2019 approving additional SGI compensation for the period 2007-2011, pursuant to a specific requirement under Article 16 of Law 4635/2019. This period is before the entry into force of the SGEI Framework and the approval of this State aid by the European

Commission. PPC has lodged an appeal against RAE Decision No 1019/2019 before the Administrative Court of Appeal (15th Chamber), which has not yet been heard.

## **2. ELTA**

The Commission received a complaint from ACS SA in May 2020 concerning alleged unlawful State aid granted to Hellenic Post (ELTA). By Decision No 1276 final/10.03.2022, the Commission then opened a formal investigation procedure pursuant to Article 108(2) TFEU. This included investigation into the payment by the Greek State of EUR 149 million as additional compensation to ELTA for the provision of the universal postal service in the years 2013-2018. Correspondence between the Commission and the Greek authorities in the context of this formal investigation procedure is still ongoing.

## 5. MISCELLANEOUS QUESTIONS

a. We kindly invite you to indicate whether your authorities have experienced difficulties in applying the 2012 SGEI Decision and ask you to in particular consider the following issues:

- **drawing up an entrustment act that complies with Article 4 of the SGEI Decision;**
- **specifying the amount of compensation in line with Article 5 of the SGEI Decision;**
- **determining the reasonable profit level in line with Article 5(5)-(8) of the SGEI Decision;**
- **regularly checking overcompensation as required by Article 6 of the SGEI Decision;**

Please be as specific as possible in your reply, include relevant examples and, if applicable, the sector for which the difficulties are (most) relevant.

**NB: SOME COMMENTS FROM THE OP TRANSPORT INFRASTRUCTURE, ENVIRONMENT AND SUSTAINABLE DEVELOPMENT**

b. We kindly invite you to indicate whether your authorities have experienced difficulties in applying the 2012 SGEI Framework and ask you to in particular consider the following issues:

- carrying out a public consultation in line with paragraph 14 of the SGEI Framework;
- complying with public procurement rules in line with para 19 of the SGEI Framework;
- determining the net avoided cost as required by paras 25-27 of the SGEI Framework;
- determining the reasonable profit level in line with paras 33-38 of the SGEI Framework;

Please be as specific as possible in your reply, include relevant examples and, if applicable, the sector for which the difficulties are (most) relevant.

c. If you have any other comments on the application of the SGEI Decision and the SGEI Framework on issues other than the ones covered in the previous questions please feel free to provide them below.

**Please find annexed non-mandatory information on ferry and air connections for marginal routes and waste collection. The relevant amounts are not calculated in the summary table.**

## ANNEX: Other non-mandatory information

### A. MARITIME 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 <b>contents of the services entrusted as SGEI</b> 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 and subsequently codified by Articles 10 et seq. of Law 4948/2022 (GG I 125), 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> <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 ferry 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) <b>forms of entrustment</b> . 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 10 et seq. of Law 4948/2022 (GG I 125), 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), <b>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).</b></p> <p>A model of the public service entrustment contracts is shown in TABLE I.</p>
<b>Average duration of the entrustment (in years) and the proportion of entrustments that are longer than 10 years (in %) per sector.</b> Specify in which sectors SGEI were entrusted with a duration exceeding 10 years and explain how this duration is justified.
<p>Owing to fiscal problems, approximately 58% of public service contracts are for one year. The proportion of contracts with a duration of more than ten years is around 4% and concerns</p>

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 10 of Law 4948/2022 (GG I 125) 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 does not exceed 300 000.

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 4948/2022 (GG I 125) 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.**



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.

**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.

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.

#### **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 2020 and 2021. (A+B+C)**

<b>2020</b>	<b>2021</b>
<b>Budget: EUR 122 million</b> (Public Investment Programme)	<b>Budget: EUR 135 million</b> (Public Investment Programme)

## ANNEX VI



Contract No ...../2022

**HELLENIC REPUBLIC  
MINISTRY OF SHIPPING AND ISLAND POLICY  
HELLENIC COASTGUARD HEADQUARTERS  
SHIPPING SECTION  
DIRECTORATE FOR MARITIME TRANSPORT  
SECTION B**

Address: Akti Vasileiadi, Gates E1-E2  
Postcode: 185 10 Piraeus

### **PUBLIC SERVICE CONTRACT FOR THE OPERATION OF THE ROUTE**

.....

Today ..... (day) ..... (date) ..... (month) of 2022, at the Ministry of Shipping and Island Policy, the undersigned: **(1)** ....., Minister for Shipping and Island Policy, representing by virtue of such status, in accordance with the provisions in force, the Greek State, and **(2)** ..... (ID No .....), legal representative of the company ....., in accordance with certificate No ..... of the Shipping Companies Registry, acting in implementation of Decision No ..... of the Minister for Shipping and Island Policy or of the body to which power was delegated or which was granted authorisation for such purpose, by which the result of the public tender procedure was awarded to the second party in accordance with Notice No ..... of ..... for the operation of the service from ..... to ..... and return, have hereby agreed and accepted the following:

The first party ....., in their capacity as Minister for Shipping and Island Policy, having regard to Decision No 44614/15-042021 of the Deputy Minister for Development and Investment (Internet Posting Number: ΨΟΥΡ46ΜΤΛΡ-ΧΡΣ), as amended by Decision No 90275/10-08-2021 (IPN: ΨΝΞΦ46ΜΤΛΡ-ΠΛΞ) and Decision No 44913/29-04-2022 (IPN: Ψ5ΚΜ46ΜΤΛΡ-ΚΣΙ) of the Deputy Minister for Development and Investment, and Act No ...../2022 of Chamber 7 of the Court of Auditors, shall entrust the second party, hereinafter referred to as the 'contractor', with the operation of the service from ..... to ..... and return, at a rate of ..... journey(s) per week throughout the entire service period, against a charter payment of € ....., per route, with the passenger/car ferry ..... Registration No ....., including VAT and other statutory deductions, for the period up to 31/10/20 ..., with the following terms and conditions, which the contractor accepts unconditionally.

The contract shall be governed by:

**(a)** Law 4948/2022 (GG I 125) ratifying the Code on cabotage legislation and passenger rights,

(b) the terms set out in detail in Decision No ..... of the Minister for Shipping and Island Policy ‘Notice of the 2nd repeat summer tender procedure for the servicing of routes with conclusion of a public service contract or contracts for a period up to 31 October 2022’ and the annexes attached thereto, which form an integral part of the above tender notice and of this contract, and

(c) the terms of Decision No ..... of the Minister for Shipping and Island Policy or of the body to which power was delegated or which was granted authorisation for such purpose ‘Results of an open public tender procedure for the servicing of the ‘.....’ route’.

All the above terms shall also constitute terms of this contract and shall be regarded as an integral part of this contract for the purposes of its performance.

### **I. CONTRACTOR’S OBLIGATIONS**

The contractor must:

(a) ensure that when operating the services their vessel(s) has/have up-to-date copies of all the required shipping documents, safety and marine environment protection certificates and a class certificate issued by an approved classification society, that they comply with the legislation on the health and safety and accommodation of passengers and crew, and that the crew composition and working conditions comply with the legislation in force;

(b) comply with the respective decisions setting fares and granting discounts to the categories of persons and vehicles provided for in Decision No 3324.1/01/13/15.07.2013 of the Minister for Shipping and the Aegean (GG II 1728), as amended by Decision No 3324.1/01/14/29.04.2014 (GG II 1129) and Decision No 2252.2.12/01/15/02.07.2015 (GG II 1557);

(c) comply with the obligations arising from environmental, social security and labour law established by Union law, national law, collective agreements or by the international environmental, social and labour law provisions (listed in Annex X to Law 4413/2016 (GG I 148));

(d) apply the legislation in force concerning the transport of postal items;

(e) using their vessel for these routes, if there is no other alternative method, provide transport services for hazardous or inconvenient cargo and live animals, in accordance with the applicable provisions on the transport of such cargo;

(f) pay the applicable taxes, fees and other charges due to the State and to third parties;

(g) operate all routes continuously and in full, in accordance with the relevant scheduling decisions of the Directorate for Maritime Transport;

(h) have the electronic place reservation and passenger and vehicle ticket issuing system open by 1 April of each route period;

(i) submit, within the first ten days of each month, the passenger and vehicle traffic of the route for the immediately preceding month to the Maritime Transport Directorate electronic mailbox in the form of a table, in accordance with Annex VI to notice No .....; and

(j) *(if necessary)* transport free of charge the permanent residents and persons on the electoral roll of the island(s) of ....., and their dependants, as provided for in ANNEX IV to Notice No ....., from/to the island of .....

**Proof of the status of permanent residents** of the island(s) of ....., who

are entitled to free transport, shall be demonstrated by the person's identity card or tax clearance certificate, or a certificate from the municipality certifying permanent residence.

**Proof of the status of persons on the electoral roll**, who are entitled to free transport, shall be demonstrated by a certificate from the municipality concerned, Citizens' Service Centre or any other public authority.

**Proof of dependent status** shall be demonstrated by means of a certificate of entry in the family register.

The relevant supporting documents must be presented only to the local representative of the contractor (Shipowner/Port Agent). The above entitlement is personal and the person concerned must show their identity card or passport on boarding.

## **II. SHIP TIMETABLES – MODIFICATION OF TIMETABLES – PERIODS OUT OF SERVICE**

1. The timetables for the service on the above routes will be carried out by the passenger/car ferry ..... Registration No ..... according to the timetable sheet attached hereto, which forms an integral part hereof.

2. The contractor is obliged to operate the services on the attached timetable sheet. Changes are permitted in accordance with notice No ..... The shipowner's refusal to accept or operate the services shall result in the loss of the shipowner's rights under this contract and any rights arising therefrom.

3. The vessel is permitted to call at ports other than the ports on the route under a public service contract, provided that such calls do not hinder the operation of the route in question and do not infringe the terms of other contracts, subject to approval by the Minister for Shipping and Island Policy or by the body to which the power was delegated or which was granted authorisation for such purpose.

4. Masters of ships must make unscheduled port calls for urgent social reasons upon instruction from the competent body, as appropriate.

## **III. LETTER OF GUARANTEE**

1. For the proper performance of the terms of this contract, the contractor has lodged letter of guarantee No ..... (€ .....), in accordance with Notice No .....

2. The letter of guarantee shall be returned to the contractor one month after the end of the service period, i.e. on 01.12.20....

(if necessary) The letter of guarantee shall be valid for at least one month after the end of the service period, shall be renewed before its expiry and shall be returned to the contractor one month after the expiry of the service obligations.

3. The above guarantee shall be forfeited (partially or fully) in favour of the State in accordance with the legislation in force if the contractor deviates from the obligations of this contract and the provisions of Law 4948/2022 (GG I 125), notice No ..... and award decision No ....., and if the contractor is declared to be in default.

## **IV. CHARTER PAYMENTS**

1. For charter payments, the interested party shall submit an application to the Maritime Transport Directorate of the Ministry of Shipping and Island Policy, accompanied by the following supporting documents:

(a) a statement in triplicate showing the number of journeys carried out by date, certified by the Port Authority,

(b) an invoice for the provision of services,

(c) a certified copy in duplicate of the ship's log showing the full service schedule performed through sailings on the route,

(d) a copy of the provisional or final VAT statement submitted to the tax office, and

The submission of all the above supporting documents is a prerequisite for the submission of the above application. An application which is not accompanied by the above supporting documents will be returned with the attachments.

2. Following the initial check, the Directorate for Maritime Transport forwards the application to the competent financial department for clearance of the expenditure and execution of payment, together with the supporting documents showing the details of the contracting shipowner/ship company, the address, the competent tax office, the total amount of expenditure, the net amount payable with a breakdown of the relevant deductions, the bank account number in IBAN form, and a recent certificate of payment of tax and social security contributions. In the case of assignment or attachment, notification of assignment or attachment shall be required, in accordance with the procedures laid down in Article 145 of Law 4270/2014, as in force. Otherwise, a solemn declaration of no assignment/pledge shall be submitted.

#### **V. REDUCTION OF CHARTER PAYMENTS**

1. If, due to adverse weather conditions, the vessel does not call at a port on the route, in respect of the chartered section, but calls at the nearest safe port or bay for the passengers to disembark, then, provided there is land communication with the port on the chartered section of the route at which the vessel did not call, the charter payment shall not be reduced, provided that the port or bay at which the vessel did call is not included in the route.

2. If for any reason (apart from the above case) the vessel does not call at a port on the chartered section of the route for passengers and vehicles to disembark, the charter payment shall be reduced by the price per mile for the miles not travelled.

The minimum reduction for failure to call at a port on the route shall be the compensation corresponding to ten (10) nautical miles if the difference between the distance travelled and the required route is less than or equal to ten (10) nautical miles.

**CALCULATION OF PRICE PER NAUTICAL MILE:**

<b>ROUTE</b>	<b>ANNUAL COMPENSATED SERVICES</b>	<b>TOTAL DISTANCE OF SERVICE (in nautical miles)</b>	<b>CHARTER PAYMENT PER SERVICE</b>	<b>PRICE PER NAUTICAL MILE:</b>
.....	.....	.....	.....	.....

**VI. REPLACEMENT OF A VESSEL BY THE CONTRACTOR**

1. The passenger/car ferry ....., Registration No ....., which is scheduled to operate on the above route for the duration of the contract, shall be replaced by the passenger/car ferry ....., with the above agreed charter payment or corresponding reduction of charter payment, following approval by the Minister for Shipping and Island Policy or by the body to which power was delegated or which was granted authorisation for such purpose.

In this case, if necessary, the contractor must present to the appropriate Directorate of the Ministry of Shipping and Island Policy a letter from the issuer of the performance guarantee confirming that it is still valid for the entire period of replacement of the passenger/car ferry ....., Registration No ....., under the same terms and conditions.

2. If the shipowner sells the passenger/car ferry ....., Registration No ..... during the charter period and the same shipowner cannot replace it with another vessel with similar specifications and capacity, the new owner of the passenger/car ferry ..... Registration No ..... may continue to operate the services under the same terms and conditions, if both shipowners submit a solemn declaration of acceptance, the new owner complies with the conditions set out in ANNEX I to Notice No ....., and provided that the new owner accepts in full the rights and obligations arising from this contract. Before signing the new contract for the continuation of the service, the new shipowner must submit a corresponding letter of guarantee (according to the category of vessel). In such case, the letter of guarantee submitted by the contractor shall be returned to them.

The letter of guarantee of proper performance shall not be returned to the contractor and shall be forfeited to the State if the new shipowner does not assume the rights and obligations of this contract.

(if necessary) Where the service is run by an operator, and the shipowner sells the passenger/car ferry ..... Registration No ..... during the charter period, and the operator cannot replace it with another vessel with similar specifications and capacity, the new owner of the passenger/car ferry ..... Registration No ..... may continue to operate the services under the same terms and conditions, if the new owner and the

operator submit a solemn declaration of acceptance between them, the new owner complies with the conditions set out in ANNEX I to Notice No ....., and provided that the new owner accepts in full the rights and obligations arising from this contract. Before signing the new contract for the continuation of the service, the new shipowner must submit a corresponding letter of guarantee (according to the category of vessel). In such case, the letter of guarantee submitted by the contractor/operator shall be returned to them.

The letter of guarantee of proper performance shall not be returned to the contractor/operator and shall be forfeited to the State if the new shipowner does not assume the rights and obligations of this contract.

3. In the event of replacement of the passenger/car ferry ..... Registration No ....., the charter payments shall be made to the contractor.

## **VII. DEFAULT BY THE CONTRACTOR – PENALTIES**

1. In any case of default of the contractor:

(a) the contractor may be temporarily excluded from all concession contracts falling within the scope of Law 4413/2016, in accordance with the more specific provisions of Article 42 thereof, without prejudice to the application of the provisions of Article 21 of Law 4948/2022 (GG I 125).

(b) a new tender procedure for the chartering of the service shall take place, to the detriment of the defaulting contractor, and the defaulting contractor shall be required to pay compensation to the State equal to the difference between the lowest charter fee offered by them and any higher charter fee obtained through the new tender. This paragraph may be applied if the Minister for Shipping and Island Policy considers it appropriate.

2. If the contractor is in breach of their contractual obligations, the contractor shall also be subject to any penalties in accordance with Law 4948/2022 (GG I 125).

## **VIII. CONTRACT VALIDITY**

This contract shall remain in force until 31.10.20... and may, in accordance with the provisions of Article 12 of Law 4948/2022 (GG I 125), be extended for a total period of up to four (4) months.

## **IX. ASSIGNMENT**

The contractor has no right to assign its rights and obligations under this contract to any third party (natural or legal person) in any way and for any reason, without the prior express written consent of the Minister for Shipping and Island Policy.

## **X. OTHER CONDITIONS**

1. During the charter period and with the consent of the contractors, the Minister for Shipping and Island Policy may make such amendments as circumstances may require in order to consolidate certain routes or to add or remove ports of call, provided that this does not result in an additional financial burden for the State and achieves better service of transport needs.

2. It is agreed that any dispute arising from the application of this contract shall fall within the jurisdiction of the courts of Piraeus.

The second party, the ‘contractor’, agrees and fully accepts the above arrangements.



This contract, having been read and verified, is signed by the parties in four (4) originals, three (3) of which will be deposited with the competent departments of the Ministry of Shipping and Island Policy and the fourth one will be received by the ‘contractor’.

**THE CONTRACTING PARTIES**

**FOR THE GREEK STATE**

**THE MINISTER**

**FOR THE CONTRACTOR**

**Details of legal representative:**

## B. 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*

(a) 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*.

(b) 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 operating independently again, i.e. without the extension to Kalymnos)
- *Thessaloniki – Limnos – Ikaria* (the tender for this service was unsuccessful)

In 2010 the following came into operation as public service routes:

- *Athens – Kozani – Kastoria* and
- *Thessaloniki – Limnos – Ikaria*

When renewing the obligation, from 1 April 2012 the following routes were extended:

- *Rhodes – Kos – Leros – Astypalaia* to include *Kalymnos* as an intermediate station between Kos and Leros, and
- *Corfu – Aktio – Kefalonia – Zakynthos* to *Kythira*.

The following came into operation as public service routes from 1 April 2012:

- *Athens – Syros* and
- *Athens – Zakynthos*

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:

- *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 Public Service Obligations and the current 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 entrustment of the operation of routes to airlines and the time period for their operation was not more than four (4) 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.

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), for proper performance of the public service obligations imposed on each route for which a bid is submitted.

The financial tender must include:

- i. A detailed breakdown of the estimated annual **costs (direct and indirect operating costs)** of each service, by route, quarter and year:

The estimated **annual costs of the use** of the aircraft on each route comprise **direct operating costs** (*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*) and **indirect operating costs** (*marketing and sales expenses, station expenses, administrative costs and other indirect costs, if any, which the air operator must determine accurately*).

- ii. A detailed analysis of the estimated **revenue** from the operation of the service:

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.

- iii. The **estimated reasonable percentage profit** per service:

The estimated reasonable percentage profit per service, route and year does not exceed 10% of the total cost (*direct and indirect operating cost*) per route and service (*profit = 10% \* total cost*).

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.

Full Template for Calculation of Financial Compensation

(Table IV)

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

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.

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 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.

The full text of the imposition of obligations and the call for proposals is posted on the CAA website (hcaa.gr). The full text of the call for proposals is also published in two national newspapers.

#### **Amount of aid granted**

**Total amount of aid granted (in EUR millions)<sup>12</sup>. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)**

2020		2021	
14 780		11 959	
Additional quantitative information (e.g. number of beneficiaries per sector, average aid amount, size of the undertakings)			
2020		2021	
Astra Airlines <sup>21</sup>	486 887.99	Astra Airlines	254 100.73
Sky Express	11 659 435.02	Sky Express	8 066 581.38
Olympic Air	2 633 993.51	Olympic Air	3 638 280.01

<sup>21</sup> Amounts owed in the previous year

**TABLE I****Public service obligations****Minimum frequency of flights and minimum number of seats available each week on each route**

	<i>(c) Air route</i>	Weekly frequencies per season	(d) Minimum seats available per week per season
	<i>(e)</i>	<b>low/shoulder/high</b>	<b>(f) low/shoulder/high</b>
1	Athens – Astypalaia	3 / 4 / 6	90/120/180
2	Athens – Kalymnos	3 / 4 / 6	75/100/150
3	Athens – Ikaria	3 / 4 / 6	90/120/180
4	Athens – Leros	3 / 4 / 6	90/120/180
5	Athens – Milos	3 / 4 / 6	90/120/180
6	(g) Athens – Skyros	3 / 4 / 6	90/120/180
7	Athens – Kythira	3 / 4 / 6	90/120/180
8	Athens – Naxos	3 / 4 / 6	90/120/180
9	Athens – Paros	7 / 10 / 14	140/200/280
10	Athens – Karpathos	3 / 4 / 6	90/120/180
11	Athens – Siteia	3 / 4 / 6	120/160/240
12	Athens – Skiathos	3 / 4 / 6	60/80/240
13	Athens – Syros	3 / 4 / 6	60/80/120
14	Athens – Zakynthos	5 / 6 / 7	175/300/350
15	Thessaloniki – Samos	3 / 4 / 6	180/240/360
16	Thessaloniki – Chios	3 / 4 / 6	180/240/360
17	Thessaloniki – Corfu	2 / 2 / 2	90/90/90
18	Thessaloniki – Skyros	2 / 2 / 2	60/60/60
19	Thessaloniki – Kalamata	3 / 4 / 6	150/200/300

20	Thessaloniki – Limnos – Ikaria	3 / 4 / 6	90/120/180
21	Limnos – Mytilini – Chios Samos – Rhodes	2 / 2 / 3	50/50/75
22	Rhodes – Kastelorizo	3 / 4 / 6	60/80/120
23	Rhodes – Karpathos – Kasos	3 / 4 / 6	90/120/180
24	Rhodes – Kos – Kalymnos Leros – Astypalaia	2 / 2 / 3	50/50/75
25	Corfu – Aktio – Kefalonia Zakynthos	2 / 2 / 3	50/50/75
26	Alexandroupoli – Siteia	2 / 2 / 2	60/60/60
27	Aktio – Siteia	2 / 2 / 2	60/60/60
28	Athens – Kozani – Kastoria	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 <b>low and shoulder</b> season	Maximum fare in the <b>high summer</b> 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 by the airport 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**

<b>ROUTE</b>		<b>AIRLINE(S) OPERATING THE ROUTE</b>	<b>CONTRACT VALIDITY</b>
1.	Athens – Paros	OLYMPIC AIR – SKY EXPRESS	01/10/2016 to 30/06/2022
2.	Athens – Zakynthos	OLYMPIC AIR – SKY EXPRESS	01/10/2016 to 30/06/2022
3.	Athens – Ikaria	OLYMPIC AIR – SKY EXPRESS	01/10/2016 to 30/06/2022
4.	Athens – Karpathos	OLYMPIC AIR – SKY EXPRESS	01/10/2016 to 30/06/2022
5.	Athens – Kythira	OLYMPIC AIR – SKY EXPRESS	01/10/2016 to 30/06/2022
6.	Athens – Skiathos	OLYMPIC AIR – SKY EXPRESS	01/10/2016 to 30/06/2022
7.	Thessaloniki – Samos	OLYMPIC AIR – SKY EXPRESS	01/10/2016 to 30/06/2022
8.	Thessaloniki – Chios	OLYMPIC AIR – SKY EXPRESS	01/10/2016 to 30/06/2022
9.	Athens – Milos	OLYMPIC AIR – SKY EXPRESS	01/04/2017 to 31/01/2023
10.	Athens – Naxos	OLYMPIC AIR – SKY EXPRESS	01/04/2017 to 31/01/2023
11.	Athens – Siteia	OLYMPIC AIR	01/04/2017 to 31/01/2023
12.	Athens – Syros	SKY EXPRESS	01/10/2016 to 31/01/2023
13.	Athens – Astypalaia	SKY EXPRESS	01/10/2016 to 31/01/2023
14.	Thessaloniki – Limnos – Ikaria	OLYMPIC AIR	01/12/2019 to 31/01/2023

15.	Athens – Leros	OLYMPIC AIR	01/10/2016 to 31/01/2023
16.	Athens – Skyros	OLYMPIC AIR	01/10/2016 to 31/01/2023
17.	Thessaloniki – Kalamata	OLYMPIC AIR	01/10/2016 to 31/01/2023
18.	Rhodes – Kastelorizo	OLYMPIC AIR	01/10/2016 to 31/01/2023
19.	Rhodes – Karpathos – Kasos	SKY EXPRESS	01/10/2016 to 31/01/2023
20.	Athens — Kalymnos	SKY EXPRESS	12/04/2018 to 31/01/2023
21.	Thessaloniki – Skyros	SKY EXPRESS	01/04/2017 to 31/01/2023
22.	Limnos – Mytilini – Chios – Samos – Rhodes	SKY EXPRESS	01/04/2017 to 31/01/2023
23.	Corfu – Aktio – Kefalonia – Zakynthos	SKY EXPRESS	01/04/2017 to 31/01/2023
24.	Thessaloniki – Corfu	SKY EXPRESS	12/04/2018 to 31/01/2023
25.	Aktio – Siteia	SKY EXPRESS	01/10/2017 to 31/01/2023
26.	Alexandroupoli – Siteia	SKY EXPRESS	01/06/2018 to 31/01/2023
27.	Rhodes – Kos – Kalymnos – Leros – Astypalaia	SKY EXPRESS	01/06/2018 to 31/01/2023
28.	Athens – Kozani – Kastoria	SKY EXPRESS	01/12/2019 to 31/01/2023

*N.B.:*

- 1. Routes 1-11 run on Open PSOs (without exclusive rights) following interest expressed by airlines.*
- 2. Routes 12, 15 and 17 are run without compensation, with exclusive rights awarded following 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:

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

**2. 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.

<b>Service: .....</b>	<b>Per flight</b>	<b>Per quarter</b>				<b>Annual total</b>
		<b>1st quarter</b>	<b>2nd quarter</b>	<b>3rd quarter</b>	<b>4th quarter</b>	
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)						
<b>TOTAL</b>						

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)						
<b>TOTAL</b>						

### 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	
<b>Total cost (direct + indirect)</b>						
<b>- Revenue</b>						
<b>= Difference</b>						
<b>+Profit (profit percentage * Total cost)</b>						
<b>= Financial Compensation Sought</b>						

#### TOTAL FINANCIAL COMPENSATION OF THE FOUR-YEAR PERIOD:

.....

**TABLE V**  
**TOTAL FINANCIAL COMPENSATION PAID DURING THE FOUR-YEAR**  
**PERIOD 2017-2021**

**In million EUR**

*(Actual disbursements after the relevant audits were completed)*

<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
<b>18 563 150</b>	<b>9 954 467.41</b>	<b>10 664 738.52</b>	<b>14 780 316,52</b>	<b>11 958 962.12</b>



### C. WASTE COLLECTION (Peloponnese Region)

#### Clear and comprehensive description of how the respective services are organised in your Member State<sup>22</sup>

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 SGEI concerns the treatment of solid municipal waste (MSW) of the Peloponnese Region, the beneficiary being the Region of Peloponnese and the SGEI provider the Peloponnese SWMO.

The area to be served comprises the municipalities of Tripoli, North Kynouria, Gortynia, Megalopoli, South Kynouria, Nafplion, Argos-Mykines, Epidavros, Ermionida, Korinthia, Velos-Vocha, Loutraki-Agioi Theodori, Nemea, Xylokastro-Evrostina, Sikyona, Sparta, East Mani, Elafonisos, Evrota, Monemvasia, Kalamata, Messina, Oichalia, Pylos-Nestor and Trifylia.

The SGEI costs include:

A. Construction of integrated waste management infrastructure in the Peloponnese Region with a PPP, as detailed below:

Subsection 1:

A waste treatment plant (WTP), which will be able to fully treat all the conventional waste from the Regional Units of Korinthia and Argolida and the municipalities of Tripoli, North Kynouria and South Kynouria of the Regional Unit of Arcadia. The WTP will be able to treat 105 000 tonnes of waste per year and comprises:

- a Mechanical Treatment Plant (MTP),
- a Biological Treatment Plant (BTP),
- a Mechanical Composting Plant,

a landfill site at the same location for the disposal of residues, with a total useful capacity of approximately 1 975 000 m<sup>3</sup>,

two Waste Transfer Stations (WTS),

a Transitional Management Plant, to be built at the same location as the waste treatment plant and the landfill site.

Subsection 2:

A waste treatment plant (WTP), which will be able to fully treat all the conventional waste from the Regional Unit of Messinia and the municipalities of Megalopoli and Gortynia of the

<sup>22</sup> If in a certain sector only a small number of individual SGEIs exist in your Member State, we appreciate a detailed description of those services. If a large number of services are entrusted in a specific sector in your Member State (for example because the competence lies with regional or local authorities), individual details of the entrustments would be disproportionate, but a clear and concise general description of the way the sector is organised including the common features of the individual entrustments remains crucial. Since cases falling under the SGEI Framework will be limited in number, the Commission expects a detailed description of each concrete measure.

Regional Unit of Arkadia. The WTP will be able to treat 65 000 tonnes of waste per year and will comprise:

- a Mechanical Treatment Plant (MTP),
- a Biological Treatment Plant (BTP),
- a Mechanical Composting Plant,

a landfill site at the same location for the disposal of residues, with a total useful capacity of approximately 1 240 000 m<sup>3</sup>,

a Transitional Management Plant, to be built at the same location as the waste treatment plant and the landfill site.

Subsection 3:

A waste treatment plant (WTP), which will be able to fully treat all the conventional waste from the Regional Unit of Lakonia. The WTP will be able to treat 30 000 tonnes of waste per year and will comprise:

- a Mechanical Treatment Plant (MTP),
- a Biological Treatment Plant (BTP),
- a Mechanical Composting Plant,

a landfill site at the same location as the WTP for the disposal of residues, with a total useful capacity of approximately 565 000 m<sup>3</sup>,

a Transitional Management Plant, to be built at the same location as the waste treatment plant and the landfill site.

B) Purchase of land for the construction of the above infrastructure.

C) Technical support for the implementation of the action, i.e. the provision of services of a technical consultant to provide the necessary technical and support services during the design and construction of the infrastructure, which are considered necessary because of the specialised nature of the project, among other things.

D) Actions to raise awareness about the project.

E) Availability payment.

F) SGEI provider's management and personnel costs.

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

A) The procedures applied are: Law 3389/2005 on public-private partnerships. The public-private partnership system has been chosen for the implementation of the 2nd subsection of the project. The construction of all the necessary infrastructure for the treatment of waste and the final disposal of residues in the Peloponnese Region is a project that includes specific know-how and aims to achieve specific targets for recycling of materials and disposal of residue. The choice of this method ensures full coherence of the design and construction of the subsection; both stages are implemented by the contractor, the construction costs are strictly defined when the contract is signed, since the contractor is committed to a fixed flat-rate fee and takes into account the costs of operating the facility, in addition to the construction costs, thus choosing the most advantageous solution throughout the lifetime of the facility for the residents served.

(B) The procedures applied are: purchase and transfer of land in accordance with the

Partnership contract.

(C) The procedures applied are: 1. Law 4013/2011 establishing a single Independent Public Procurement Authority and a Central Electronic Register of Public Contracts; 2. Joint Ministerial Decision No Π1/2380/18-12-2012 regulating the more specific aspects of the operation and management of the Central Electronic Register of Public Contracts; 3. Law 4412/2016 on public works, supply and service contracts (adaptation to Directives 2014/24/EU and 2014/25/EU). The implementation of the 2nd subsection of the project requires parallel implementation of the 3rd subsection concerning Technical Assistance. The planning and construction of all the necessary infrastructure for waste treatment and final disposal of residues in the Peloponnese Region is a complex technical project, and the services of the Peloponnese Region and the Regional Association of Solid Waste Management Operators of the Peloponnese do not have the appropriate experience and specialised staff to monitor its implementation. The choice of appropriate Technical Assistance will meet this need and ensure the smooth implementation of the project. The implementation period for the 2nd subsection is identical to that of the 1st subsection, precisely to avoid creating inconsistencies during the planning and construction of the waste treatment and final waste disposal infrastructure.

(D) The procedures applied are: 1. Law 4013/2011 establishing a single Independent Public Procurement Authority and a Central Electronic Register of Public Contracts; 2. Joint Ministerial Decision No Π1/2380/18-12-2012 regulating the more specific aspects of the operation and management of the Central Electronic Register of Public Contracts; 3. Law 4412/2016 on public works, supply and service contracts (adaptation to Directives 2014/24/EU and 2014/25/EU). The implementation of the 2nd subsection of the project requires parallel implementation of the 4th subsection concerning Legal Assistance. The implementation of public-private partnership contracts involves risks, the key elements being correct distribution and fulfilment of objectives.

E) The applicable procedures are the conclusion of a Programming Contract between the beneficiary and the Local Government Development Organisation 'MORIAS SA'.

**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 SGEI is 33 years, including the time to establish the infrastructure necessary to provide the service.

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

Not applicable

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.

The net avoided cost methodology is used.

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

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).

<https://www.ymepeeraa.gr/edaxis-ergon/entakseis-ergon/806-olokliromeni-diaxeirisi-aporrimmaton-perifereias-peloponnisou-me-sdit-mis-5035327-ops-prosklisis-ts4>

<https://www.terna-energy.com/acivities/erga-vioaerioy-diach-aporrimmaton/olokliromeni-diachirisi-aporrimmaton-periferias-peloponnisou/>

<https://www.ppel.gov.gr/programmatiki-simvasi-gia-drasis-enimerosis-ke-evesthitopiisis-schetika-me-tin-olokliromeni-diachirisi-ton-aporrimmaton-stin-periferia-peloponnisou/>

<https://ypen.gov.gr/xekina-i-kataskevi-tou-ergou-sybraxis-dimosiou-idiotikou-tomea-olokliromeni-diacheirisi-aporrimmaton-peloponnisou/>

<https://www.mindev.gov.gr/%CF%85%CF%80%CE%BF%CE%B3%CF%81%CE%B1%CF%86%CE%AE-%CE%AD%CE%BD%CE%B1%CF%81%CE%BE%CE%B7%CF%82-%CE%B9%CF%83%CF%87%CF%8D%CE%BF%CF%82-%CF%84%CE%B7%CF%82-%CF%83%CE%B4%CE%B9%CF%84-%CE%BF%CE%BB%CE%BF/>

#### Amount of aid granted

**Total amount of aid granted (in EUR millions)<sup>23</sup>. This includes all aid granted in your territory, including aid granted by regional and local authorities. (A+B+C)**

2020 (*)	2021 (*)
0.305	12.931

(\*) : As the Major Project application has not yet been submitted to the European Commission, the amounts relate to the aid granted for the years 2020 and 2021, but which has not been entered on an expenditure declaration form to be included in a payment request to the Commission.

<sup>23</sup> As stipulated in Paragraph 62(b) of the 2012 SGEI Framework.

*Explanatory Table 1: PELOPONNESE SGEI PPP*

<b>Investment costs or SGEI expenditure</b>	<b>2020</b>	<b>2021</b>
A. Construction of integrated waste management infrastructure in the Peloponnese Region with a PPP	0.00	11 700 865.78
B. Purchase of land	0.00	712 409.67
C. Technical support	304 951.59	493 428.03
D. Actions to raise awareness about the project	0.00	0.00
E. Availability payments	0.00	0.00
F. SGEI provider's management and personnel costs	0.00	24 477.60
<b>Compensation</b>	<b>-304 951.59</b>	<b>-129 311 81.08</b>

The annual compensation has been calculated as follows:

Annual compensation = - investment cost + total revenue - total costs + residual value

- Investment costs: the (eligible) costs (\*) of subprojects 1 (land purchase), 2 (PPP), 3 (technical consultant) and 5 (awareness-raising actions) are counted
- (\*): As the Major Project application has not yet been submitted to the European Commission, the amounts relate to the expenditure which has been incurred, but which has not been entered on an expenditure declaration form to be included in a payment request to the Commission.
- Revenue: from fees for the use of the SGEI is zero for the years 2020 and 2021, as the infrastructure was under construction.
- Residual Value: zero
- Expenditure: availability payments and management and staff costs of SGEI provider (Peloponnese Region): legal adviser