



LIFE Project Number
LIFE14 GIE/GR/000026

FINAL REPORT
Covering the project activities from 01/10/2015¹ to 30/06/2021

Reporting Date²
30/09/2021

LIFE PROJECT NAME or Acronym
**“Promoting awareness of wildlife crime prosecution and liability
for biodiversity damage in NATURA 2000 areas in Crete”**
Acronym: “LIFE Natura Themis”

Data Project

Project location:	Crete, Greece	
Project start date:	01/10/2015	
Project end date:	30/09/2020	Extension date: 30/06/2021
Total budget:	€1,580,117.00	
EU contribution:	€935,782.00	
(%) of eligible costs:	60.00%	

Data Beneficiary

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¹ Project start date

² Include the reporting date as foreseen in part C2 of Annex II of the Grant Agreement

This table comprises an essential part of the report and should be filled in before submission

Please note that the evaluation of your report may only commence if the package complies with all the elements in this receivability check. The evaluation will be stopped if any obligatory elements are missing.

Package completeness and correctness check	
Obligatory elements	✓ or N/A
Technical Report	
The correct latest template for the type of project (e.g. traditional) has been followed and all sections have been filled in, in English <i>In electronic version only</i>	✓
Index of deliverables with short description annexed, in English <i>In electronic version only</i>	✓
<u>Final report</u> : Deliverables not already submitted with the MTR annexed including the Layman's report and after-LIFE plan Deliverables in language(s) other than English include a summary in English <i>In electronic version only</i>	✓
Financial Report	
The reporting period in the financial report (consolidated financial statement and financial statement of each Individual Beneficiary) is the same as in the technical report with the exception of any terminated beneficiary for which the end period should be the date of the termination.	✓
Consolidated Financial Statement with all 5 forms duly filled in and signed and dated <i>Electronically Q-signed or if paper submission signed and dated originals* and in electronic version (pdfs of signed sheets + full Excel file)</i>	✓
Financial Statement(s) of the Coordinating Beneficiary, of each Associated Beneficiary and of each affiliate (if involved), with all forms duly filled in (signed and dated). The Financial Statement(s) of Beneficiaries with affiliate(s) include the total cost of each affiliate in 1 line per cost category. <i>In electronic version (pdfs of signed sheets + full Excel files) + in the case of the Final report the overall summary forms of each beneficiary electronically Q-signed or if paper submission, signed and dated originals*</i>	✓
Amounts, names and other data (e.g. bank account) are correct and consistent with the Grant Agreement / across the different forms (e.g. figures from the individual statements are the same as those reported in the consolidated statement)	✓
Beneficiary's certificate for Durable Goods included (if required, i.e. beneficiaries claiming 100% cost for durable goods) <i>Electronically Q-signed or if paper submission signed and dated originals* and in electronic version (pdfs of signed sheets)</i>	<i>Not required for ENV-GIE projects</i>
Certificate on financial statements (if required, i.e. for beneficiaries with EU contribution $\geq 750,000$ € in the budget) <i>Electronically Q-signed or if paper submission signed original and in electronic version (pdf)</i>	<i>Not required</i>
Other checks	
Additional information / clarifications and supporting documents requested in previous letters from the Agency (unless already submitted or not yet due) <i>In electronic version only</i>	✓
This table, page 2 of the Final report, is completed - each tick box is filled in <i>In electronic version only</i>	✓

**signature by a legal or statutory representative of the beneficiary / affiliate concerned*

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2. List of key-words and abbreviations

AB:	Associated Beneficiary
CoB:	Coordinating Beneficiary
CB:	Chania Bar Association / Chania Bar
CINEA:	European Climate, Infrastructure and Environment Executive Agency
COIEL:	Coordination Office for the Implementation of Environmental Liability
ComExp:	Committee of Experts
EASME:	Executive Agency for Small and Medium-sized Enterprises
EC:	European Commission
ELD:	Environmental Liability Directive
ELO:	Environmental Law Observatory
EMT:	(LIFE) External Monitoring Team
FR:	Final Report
GA:	Grant Agreement
GIS:	Geographic Information Systems
HB:	Heraklion Bar Association / Heraklion Bar
HSPN:	Hellenic Society for the Protection of Nature
MJTHR:	Ministry of Justice, Transparency and Human Rights
MoEE:	Ministry of Environment and Energy
MtR:	Mid-term Report
N2000:	NATURA 2000 (sites)
NHMC:	Natural History Museum of Crete
PA:	Partnership Agreement
PD:	Presidential Decree
PR:	Progress Report
PSC:	Project Steering Committee
QCM:	Quality Control Mechanism
UoC:	University of Crete
YPEKA:	Ministry of Environment, Energy and Climate Change (following the Greek National Elections of January 2015, YPEKA was renamed to “Ministry of Reconstruction of Production, Environment and Energy [YPAPEN]”, while after the Greek National Elections of September 2015 the relevant Ministry was once more renamed to “Ministry of Environment and Energy [YPEN or MoEE]”)
YPEN:	Ministry of Environment & Energy (since 22/09/2015)

3. Executive Summary

The project was implemented during the period 01/10/2015 to 30/06/2021, with a 9-month prolongation compared with its provisional duration in Grant Agreement (i.e. 30/09/2020), due to the Covid-19 pandemic that appeared in early 2020 all over Europe. The implementation of the LIFE Natura Themis project had been significantly regressed within 2020, due to measures and restrictions for the inhibition of COVID-19 in Greece (and all around Europe).

The Coordinating Beneficiary (UoC) addressed a request to EC/EASME for an Amendment to the Grant Agreement (GA) Number LIFE14 GIE/GR/000026 – LIFE Natura Themis, asking the prolongation of the project for a 9-month period (new end date of the project to be set on 30/06/2021, instead of 30/09/2020 as it was provided in the original GA). The relevant Letter Amendment No 3 to GA for Project LIFE14 GIE/GR/000026 – LIFE Natura Themis was provided on September 30, 2020.

All actions that were foreseen to be implemented since 2018 were concluded in due time and their Deliverables were delivered either with the Mid-term Report (MtR, 31/10/2017) or with the 2nd Progress Report (delivered on 05/02/2019). Actions that were planned to be implemented since 30/06/2021 (namely B1-B5, C2, D2-D5 and E1-E5) were finished on time and their deliverables are included in the current Final Report (FR) of the project.

Regarding the implementation of all Actions, a brief description follows:

- **Action A1** (*A Review on Current Situation: An update on EU and national environmental legislation about NATURA 2000 in Greece and gathering and analysis of judicial review procedures statistical data in Crete*) was implemented according to the foreseen time schedule, with a 3-month extension for the collection and update of data.
- **Action A2** (*Communication Strategy*) started on time and was completed in December 2016, with the determination of the relevant project's messages and the Communication Strategy Plan.
- **Action B1** (*Environmental Law Observatory [ELO] of East Crete*) started in September 2016 with the implementation of preliminary actions and the ELO started its operation in January 2017. Every four months, the team of the ELO of East Crete checks and registers all published bills, acts, laws, technical regulations, ministerial or administrative decisions and public contracts referring to direct or indirect environmental management of the NATURA 2000 areas of East Crete. Contacts with stakeholders, targeted audiences and local community were made on a permanent basis during the period 2017-2021.
- **Action B2** (*Environmental Law Observatory [ELO] of West Crete*) started in September 2016 with the implementation of preliminary actions and the ELO was in full operation since November 2016. Every four months, the team of the ELO of West Crete checks and registers all published bills, acts, laws, technical regulations, ministerial or administrative decisions and public contracts referring to direct or indirect environmental management of the NATURA 2000 areas of West Crete. Contacts with stakeholders, targeted audiences and local community were made on a permanent basis during the period 2016-2021.
- **Action B3** (*Awareness Raising Activities: Workshops, Conferences and Smart Devices Application*) started earlier than the foreseen time schedule. The Application for Smart Devices started its operation in August 2017. The 2-day National ELD Conference was held in Heraklion on September 8-10, 2017; the 3-day International Conference on Wildlife Crime was held in Athens on November 23-25, 2018; and the Final Conference entitled "Environmental Crime: LIFE Natura Themis Review and Report", was held online on June 2, 2021. Sixteen (16) workshops for rural population, local media and

professionals involved in tourism were organised during the period November 2018 to April 2021. Six (6) educational workshops for investigating agents were organised within November 2019. Action's Deliverables, namely the Proceedings of the National and the International Conference were delivered with the MtR (31/10/2017) and the 2nd PR (05/02/2019), respectively, while the Proceedings of the Final Conference and the Report on the development and use of the smart devices application are included in current FR.

- **Action B4** (*Local media as a tool towards awareness raising and educating*) started on time. A list of all radio, newspaper and other media recipients in Crete was compiled for the project needs. Thirteen (13) Press Articles have been produced and published. The 3 Press Conferences were held in December 2016, May 2018 and March 2021, respectively, and the two (2) TV spots and the two (2) Radio spots were produced on time (August 2017). Fifty (50) Press Releases on different occasions have been circulated in local and national media, one (1) independent article in a national circulation newspaper referred to the project, and the Coordinators of all beneficiaries delivered twenty five (25) interviews in local and/or national TV and Radio stations.
- **Action B5** (*Training Seminars*) started within the foreseen time schedule (March 2017). Eight (8) out of the nine (9) Training Seminars were organized for Judges/Prosecutors (2 in Heraklion & Athens), Lawyers (3 in Chania, Heraklion & Athens), Public Servants (1 in Heraklion), and NGOs (2 in Heraklion & Athens).
- **Action B6** (*Production of Technical Guides*) started in January 2017 and concluded with no major delays. The three (3) Technical Guides were printed in April 2019 and their dissemination continued till the end of the project. The Deliverables were provided with the 2nd PR (05/02/2019).
- **Action C1** (*Evaluation of the project effectiveness*) started on time. The baseline survey of the Action was concluded in November 2016 and the relevant Deliverable: "A report of the baseline survey results", was delivered with the MtR (31/10/2017). The 2nd midterm evaluation survey was concluded in September 2019 and the Deliverable: "A report on the assessment of the two environmental awareness surveys", is provided with the current FR.
- **Action C2** (*Socio-economic impact of the project actions*) started on time (April 2019) and was implemented smoothly until the break out of the pandemic of Covid-19. Delays occurred in conducting face-to-face interviews and completing questionnaires; however, the Action was completed on time (30/06/2021) and the Deliverable "Study on the socio-economic impact of the project actions on the local economy and population" is available with the current Final Report (FR).
- **Action D1** (*Notice Boards*) started in October 2016. However, due to a delay in the price quote procedure for the External Assistant, the specifications for their construction and delays in the issue of relative permits from the competent authorities for their erection, the Action was concluded in January 2018. The Deliverable: "A report with maps with the exact location and relevant photos of the erection of the notice boards", was provided with the 2nd PR (05/02/2019).
- **Action D2** (*Project website*), started on time and the website is in full operation since March 2016. Information about the LIFE Natura Themis project and the implementation of project's actions was updated on a regular basis. The Facebook page of the project (@lifethemis) operates since November 2016 and it is updated on a regular basis too.
- **Action D3** (*Layman's Report*) started and completed within the foreseen time schedule. In total, 1,000 copies of the bilingual (Greek-English) Layman's Report were printed in June 2021, while 250 of them have been already distributed to partners and stakeholders. The Deliverable of Action D3 is available with the current Final Report.

- **Action D4** (*Networking with other LIFE and non-LIFE projects*) started and concluded on time. LIFE Natura Themis Project was collaborated with 28 LIFE and non-LIFE projects, while seven (7) declaration agreements had been signed, more than five (5) networking visits took place and more than 55 networking activities took place during the reporting period. The Replication Plan was concluded on time (April 2021) and is provided with the current Final Report.
- **Action D5** (*Dissemination of the project and its results*) started in October 2016. The project banner was printed in December 2016. Three (3) more banners were produced for the needs of the ELOs of East and West Crete and HSPN, respectively. Production of the Greek leaflet was concluded in April 2017, while the English version was printed in May 2018. The Greek leaflet was reprinted in April 2021. The design and contents of the e-Newsletters were finalised in December 2016, and the 1st e-Newsletter was delivered in January 2017. In total, 12 e-Newsletters were distributed to more than 2,500 e-mail addresses each one. News about the project and its activities were presented every three months in the quarterly journal of the HSPN “I Fysi” (Nature), each issue circulated to about 1,000 recipients. In addition, the project and its results were promoted in more than 50 local, national and international events. Both Deliverables of Action were provided with the MtR (31/10/2017).
- **Action E1** (*Project management*) run within the whole project’s duration. All beneficiaries established their working teams, and the Project Steering Committee (PSC) was created on time. The 3-member Committee of Experts (ComExp) has been created with a delay of 9 months, due to late response of invited members. In October 2020, a new member joined the ComExp in replacement of the Greek Ombudsman, Dr I. Sagias, who unfortunately passed away.
- **Action E2** (*Monitoring of the project progress*) started on time. Twelve (12) meetings of the PSC and four (4) Joint Meetings of the PSC with the ComExp took place during the project’s implementation. All the Minutes of the Meetings were concluded on time and the Deliverables were provided along with the relevant Progress Reports and/or the MtR. The 4th and the 5th year’s Minutes of relevant meetings of the PSC are provided with the current FR. Four (4) Progress Reports (namely; 1st PR on 27/10/2016; 2nd PR on 05/02/2019; 3rd PR on 08/01/2020; and 4th PR on 25/01/2021) and one (1) Mid-term Report (MtR on 31/10/2017) were provided to EC/EASME and EMT/NEEMO as foreseen in project’s proposal.
- **Action E3** (*Compilation of information needed to complete the indicator tables based on LIFE multiannual work programme for 2014-2017*) continued till the end of the project. UoC completed, on time, the LIFE Indicators Database, as requested by EC/EASME in March 2016 and provided the Deliverable: “A report on a set of programme indicators (at the beginning of the project) delivered with the 1st PR”, was delivered with the MtR (31/10/2017). The second Deliverable: “A report on a set of programme indicators (after the end of the project) delivered with the FR”, is provided with the current Final Report.
- **Action E4** (*Auditing of the project’s financial report by an independent body*) was set to be implemented in two phases, according to the project’s timetable. After the modifications in Article II.23.2 (d) of the GA, activated from 14/09/2018, is not required”. In this context, there is no obligation for CoB or other ABs of the project to provide a Final Audit Report.
- **Action E5** (*After-LIFE Plan*) started and concluded in the foreseen time schedule. A paper and electronic English report setting the “After-LIFE Plan” is provided in two languages (English and Greek) with the FR.

In conclusion, the project was implemented within the established time schedule and the difficulties that have occurred did not affect its successful completion. The project's objectives and work plan were totally viable within its implementation period, since no major implications had occurred regarding the establishment of the project's management structure and the implementation of all actions. Feedback from stakeholders, targeted audiences, authorities, public services and national / international collaborators was more than sufficient. Almost all competent authorities (judicial, administrative and executive) were informed about the LIFE Natura Themis project and the majority of involved officers and legal professionals were aware about both the ELD and wildlife crime. Lawyers and prosecutors/judges of Crete and Greece expressed their interest to be further aware about environmental legislation or gain more knowledge on environmental issues, while the lay public have used the project's core tools (i.e. Environmental Law Observatories and Application for Smart Devices) and addressed project's beneficiaries for advices and information regarding legal claiming for environmental violations and/or environmental degradation/crime incidences.

It is estimated that more than **209,350** people all over Greece (more than **186,000** of them in Crete) were informed about the project, its actions and objectives, as well as about environmental crime during project's implementation. Quantitative measures related to Action B4 are not included in numerical estimations of this paragraph.

During the whole reporting period, no significant problems or difficulties were encountered regarding technical, financial or organisational issues. A minor constraint occurred in Action A1, regarding the gathering of data from the State Prosecuting Offices of Heraklion and Lassithi. However, this constraint was dealt with and no delays occurred. A delay occurred in the establishment of the Committee of Experts (Action E1), but the ComExp was in full operation since early January 2017. The delay in the Notice Boards' placement (Action D1) had no serious impacts in project's success. The most serious obstacle was the outbreak of the Covid-19 pandemic in early 2020, which forced the postponement of many foreseen events of the project, most of which were finally concluded online.

4. Introduction

4.1. Brief description of background, problems and objectives

NATURA 2000 sites in Crete face numerous environmental problems including stressed natural resources, desertification, deforestation, increased threats to biodiversity, and industrial-scale development of renewable energy sources. The aforementioned issues are enhanced by inadequate law enforcement and lack or low level of implementation of the EU regulations and environmental policy.

The lack of ex-officio prosecution of wildlife crime, the lack of measures for remediation of damage to biodiversity in NATURA 2000 areas and the inadequate implementation of the Environmental Liability Directive by the national and local authorities are confirmed by the results of the Actions carried out under the LIFE Natura Themis project, namely Actions A1 (*A Review on Current Situation: An update on EU and national environmental legislation about NATURA 2000 in Greece and gathering and analysis of judicial review procedures statistical data in Crete*), B1 (*Environmental Law Observatory of East Crete*), B2 (*Environmental Law Observatory of West Crete*) and C1 (*Evaluation of the project effectiveness*).

The existing legal framework for environmental protection is a mosaic of laws consisting of joint ministerial decisions and presidential decrees, and characterized by the lack of a systematic and comprehensive approach. There is not even encoding and systematic recording of environmental violations and crimes to facilitate the investigative and judicial authorities. This deficit is augmented by a weak and dysfunctional administrative framework.

A first conclusion is that either the law provisions for wildlife and protected areas are not known, or they are not applied. Another explanation for the poor jurisprudence results, as far as they appear in the relevant literature, is that environmental liability is either not prosecuted autonomously, or is prosecuted against anonymous criminals. Moreover, no official public surveys have been implemented and there is no official data about the current level of awareness of the local population, judiciary, investigating agents and public officers with regards to law provisions for wildlife and NATURA 2000 areas.

Green crime is unknown as a special category of prosecution and remains on the margins of the criminal justice system, with few cases appearing in the courts and fewer still resulting in convictions. Data identified through past LIFE reports indicated that 25% of public servants in government bodies who have direct involvement in environmental monitoring and management within NATURA 2000 areas declared no knowledge of the protection status of the NATURA 2000 areas. The baseline survey of the project (Action C1 – *Evaluation of the project effectiveness*), unfortunately, confirmed that this percentage is even higher (41%).

Although obliged to do so, no public authority or state prosecutor in Crete has ever informed the Coordination Office for the Implementation of Environmental Liability (COIEL) of YPEN about a case in which they demanded action from the polluter as defined by the ELD.

In addition, experience held by the UoC-NHMC research staff indicates a significant lack of public awareness regarding wildlife crime and EU environmental legislation in NATURA 2000 sites in Crete.

The implementation of the project confirmed the aforementioned conclusions and assessed the current level of knowledge, attitudes and practices of the stakeholders and target audiences with respect to the project's objectives through the implementation of Action C1 (*Evaluation of the project effectiveness*).

In this context, the project aimed to highlight the added value of ELD for biodiversity conservation, and to motivate the public to support correct and efficient implementation of the EU environmental legislation in NATURA 2000 areas in Crete, by establishing two (2) Environmental Law Observatories in Chania and Heraklion, respectively; by producing and operating one (1) Application for Smart Devices for motivating citizens in reporting anonymously environmental degradation incidences or environmental crimes; and by implementing a targeted awareness-raising campaign, which included the production and dissemination of printed/electronic information material, workshops, training seminars, dissemination of the project and its results with the cooperation of local media, as well as the organization of, or participation in various events.

Furthermore, the project aimed to support the effective implementation of environmental legislation and law enforcement, and to communicate the role and importance of the implementation of EU environmental legislation in human well-being by providing Judges, State Prosecutors, Lawyers, Public officers, Investigating agents, NGOs and other target audiences with the appropriate skills to engage in effective prosecution procedures with regards to environmental and wildlife crime, to demand measures for remediation of damage biodiversity and to integrate biodiversity issues in regional and national policy. This aim was fulfilled with the operation of the Application for Smart Devices and the organisation of: 2 National and 1 International Conference; 8 Training Seminars for Judges/Prosecutors, Lawyers, employees of the Decentralized Administration Authority and the Region of Crete, as well as executives and members of local and National NGOs; 6 Educational Workshops for Investigating Agents in the main cities of Crete; and 16 information Workshops for the public, the people that are employed in the primary sector and in tourism, the journalists and local media employees, and local communities.

The objectives of the project have been sufficiently achieved as evidenced by the evolution of project indicators and the feedback of the stakeholders, the public and the people who met and collaborated with the project LIFE Natura Themis.

4.2. Expected longer term results

Continuity of the project's activities will be ensured through the implementation of the After-LIFE Plan (Action E5). Among other things, the "After-LIFE Plan" provides the continuation of operation for the two Environmental Law Observatories in East and West Crete, the operation and monitoring of the Application for Smart Devices, along with a series of activities regarding information, public awareness, dissemination and communication of the project's specific information materials and deliverables.

The Heraklion Bar Association (HB) will be the responsible Associated Beneficiary (AB) for the continuation of the ELO of East Crete (Action B1), while the Chania Bar Association (CB) will be the responsible AB for the continuation of the ELO of West Crete (Action B2). Both ABs will maintain in operation the facilities of ELOs, disseminate project's information and promotional material (leaflets, Technical Guides, Conferences' Book of Proceedings, Layman's Report etc.), and participate in many forthcoming different kind of information events

The LIFE Natura Themis networking, information and communication actions enabled the project to approach a large number of local bodies and stakeholders, as well as to Cretan society overall. Examples of this include local and national mass media outlets and journalists, tourism sector professionals (hoteliers, guides, tourism agents, alternative tourism operators, those in eco-tourism and outdoor activities), local and national environmental NGOs, teachers at all levels of the education system, Environmental Education Centres,

pupils, students in various fields at different institutions in Crete and elsewhere in the country, primary sector producers (farmers, livestock breeders, fishermen, etc.), hunting associations, cultural and environmental associations, Greek and foreign visitors to the island, as well as users and non-users of NATURA 2000 Network protection areas.

Regarding collaboration, contact, communication and information over the 5-year After-LIFE project's duration (2021-2026), the same social groups will remain on the mail out list. Other potential recipients may be added, given that the After-LIFE period is regarded as a dynamically evolving process, close to the official implementation period of the LIFE Natura Themis project.

The continuation of the information campaign (partly) includes the distribution of the information material (printed and electronic), the operation of project's website and official Facebook page, the work with the local media, the participation and promotion of the project and its results to local communities and stakeholders, the contacts and networking with relevant scientific and professional groups, etc.

Both the main actions and the communication activities chosen for continuation were deemed successful in terms of implementation during the LIFE Natura Themis project, and effective in attaining the objective they were carried out for. Continuing them is considered necessary, as they will amplify the impact and influence of the results achieved by the LIFE Natura Themis project, assist in further publicising and disseminating them, and support the transfer of know-how and experience gained during project's implementation.

The project team has already recorded a warm response not only at local, but also at national and international level. The project's beneficiaries will continue their efforts to ensure successful completion of the After-LIFE period and its positive contribution regarding the awareness of wildlife crime prosecution and liability for biodiversity damage in NATURA 2000 areas at local, regional and national level. In addition, the project's beneficiaries expect the transfer of the methodology implemented to other countries or policy areas, i.e. other LIFE projects, European level NGOs, Management Bodies of the NATURA 2000 areas of Greece, etc., in compliance with what is proposed in the Replication Plan of Action D4.

5. Administrative Part

5.1. Description of the Management System

The financial administration of the LIFE14 GIE/GR/000026 – LIFE Natura Themis project was accepted by the Research Committee of the UoC under the specific Code Number 4364. The UoC received from EC/EASME the **First Pre-financing Payment of 30%** (i.e. 280,734.60 €) on 21/10/2015, and the **Second Pre-financing Payment of 40%** (i.e. 374,312.80 €) on 19/12/2017.

The **Partnership Agreements (PAs)** between the Coordinating Beneficiary (UoC) and the Associated Beneficiaries (ABs) were signed at the very beginning of the LIFE Natura Themis project (PAs were provided along with the 1st PR [27/10/2016] and the MtR [31/10/2017]). Also, the proportionate shares of the First and Second Pre-financing Payment were transferred to all ABs in due time after the relevant transfer of payments from EC/EASME to UoC (circa within a period of 1-2 months).

On 18/01/2016, EC/EASME sent a Corrigendum to Grant Agreement (GA) for Project LIFE14 GIE/GR/000026 – LIFE Natura Themis with Ref. No. Ares(2015)6184080, regarding the correction of clerical/material errors.

On 06/12/2016, EC/EASME sent the Letter Amendment No 1 to Grant Agreement (GA) for Project LIFE14 GIE/GR/000026 – LIFE Natura Themis with Ref. No. Ares(2016)7404915, regarding the modification of obligation to information, threshold for submission of audit certificate and submission of reports.

After the initiation of the project, the official name of one of the Associated Beneficiaries has changed, namely YPEKA-COIEL was renamed to YPEN-COIEL. Because of this, the UoC submitted an official request for an Amendment to the GA to EC/EASME on 18/10/2016. The UoC initiated the procedure for the Amendment of the GA on 19/09/2016 through the eProposal tool. The Letter Amendment No. 2 to the Grant Agreement for Project LIFE14 GIE/GR/000026 – LIFE Natura Themis was sent on 16/02/2017 with the EC/EASME's letter with Ref. No. Ares(2016)6729782.

On 16/08/2018, EC/EASME sent the Letter Amendment No 3 to Grant Agreement for Project LIFE14 GIE/GR/000026 – LIFE Natura Themis with Ref. No. easme.b.3(2018)3793288, regarding the modification of the definition of conditions for natural persons, submission of VAT certificate and threshold for submission of the certificate on the financial statements.

Finally, on 30/09/2020, EC/EASME sent the Letter Amendment No 3 to Grant Agreement for Project LIFE14 GIE/GR/000026 – LIFE Natura Themis with Ref. No. Ares(2020)131468 regarding the prolongation of the project for a 9-month period and modifications to specific forms of Annex II of the GA.

The Green Fund co-financed the LIFE Natura Themis project, and more specifically UoC, CB, HB and HSPN, with a total amount of 193,000.00 € during the period 2017-2021.

5.2. Evaluation of the Management System

The Management System of the project seems to have worked well enough during the whole project duration (October 2015 – June 2021). The Project Steering Committee (PSC) has met in total fourteen (14) times, either as PSC alone, or in Joint Meetings with the Committee of Experts (ComExp), and/or along with EMT/NEEMO project visits. For more details regarding project's meetings please see Action E2 (*Monitoring of the project progress*).

The ComExp has met four times during the project duration (in Joint Meeting with PSC), namely on 03/03/2017, 22-23/03/2018, 18-19/02/2020 and 08/03/2021 (the last one via teleconference). For more details of the ComExp Meetings, please see Action E2 (*Monitoring of the project progress*).

The EMT/NEEMO visited the project six (6) times in total, namely on 07/06/2016, 30/06/2017, 14-15/05/2018 (this one was combined with official EASME's project visit), 13/05/2019, 29/09/2020 (via teleconference) and 17/06/2021 (via teleconference).

Cooperation between beneficiaries was at a high level, while communication between beneficiaries was regular and addressed in the best possible way all difficulties and constraints. All beneficiaries participated in the coordination of project activities, as well as in the implementation of Actions under their responsibility, in accordance with the time schedule of the project.

Members of the project team participated in several Networking Meetings, while Declarations for Cooperation between the LIFE Natura Themis project and seven (7) other LIFE projects have been signed. During the whole project duration, the LIFE Natura Themis project collaborated with 28 LIFE and non-LIFE projects, more than five (5) networking visits took place, while more than 55 networking activities took place in total. Cooperation between the LIFE Natura Themis project and other LIFE projects was continuous during the whole reporting period (*see Action D4: Networking with other LIFE and non-LIFE projects*).

During the project duration no significant problems or difficulties were encountered regarding technical, financial or organisational issues.

Communication with the EC/EASME was at an excellent level through the whole reporting period. Responses to relevant amendments from the UoC were prompt when necessary (i.e. regarding the Amendment to the GA for the renaming of YPEKA-COIEL to YPEN-COIEL, as well as the Amendment to the GA for the 9-monthn prolongation of the project due to Covid-19 pandemic). Requests regarding financial issues from the UoC were also answered promptly by the FDO of EC/EASME.

Cooperation with the External Monitoring Team (EMT) was at a very high level, and activity MEMOs were sent from the UoC timely, on a monthly and/or a quarterly basis. Also, communication for either technical or financial issues was continuous during the whole duration of the project. All EMT's project visits in Crete (the two last ones were via teleconference due to measures for Covid-19) were quite helpful for all beneficiaries, since the presentation of the project's actions and objectives was commented on by both the EMT and beneficiaries, and efforts were made to address difficulties encountered in the best possible way (*see also Action E2 – Monitoring of the project progress*).

6. Technical Part

6.1. Technical Progress, per Action

6.1.1 Action A1: A review on current situation: an update on EU and national environmental legislation about NATURA 2000 in Greece and gathering and analysis of judicial review procedures statistical data in Crete

Foreseen start date: 01/10/2015

Actual start date: 01/10/2015

Foreseen end date: 30/09/2016

Actual end date: 31/12/2016

Action A1 was implemented according to the foreseen time schedule, with a 3-month extension needed for the collection and update of data.

Action started for the HB in December 2015 and for the CB in March 2016, when they respectively employed their project Coordinators, following a call-for-tender procedure. In June 2016, the CB Coordinator received three (3) special permits from the Hellenic Data Protection Authority, granting free access to the Court of First Instance of Chania, the Court of First Instance of Rethymno and the Court of Appeal of West Crete. The required feedback from Authorities was provided either by their direct response to data request or after personal visits of the External Assistants and/or the CB and HB Coordinators. Reports and statistical data of the Action have been produced and delivered along with the **1st Progress Report** (1st PR, 27/10/2016).

The HSPN has been involved and assisted in Action A1 by conducting research in the archive of penal decisions of the High Court of Cassation (Areios Pagos) from 2007 onwards. In March 2016, the HSPN Coordinator filed an application to collect statistical prosecution data concerning First Instance Courts of Crete before the High Court of Cassation (Areios Pagos) in Athens.

Fourteen (14) keywords/categories of crime were used, namely: damages in rural areas, lawsuits from forest rangers, damages related to the seashore, changes/degradation of seashore, forest crimes, cases related with forest arson, arson with intent, illegal hunting, illegal building, construction of an illegal building, quarry, environmental protection, and environmental pollution. Out of 95 reversal decisions of the High Court of Cassation, only 4 were found to be related with crimes committed in Crete. Therefore, further research has been conducted by the Environmental Law Observatories (Actions B1 and B2), for decisions of the Court of Appeal of Crete, which were accordingly taken to the High Court of Cassation.

The project team of YPEN-COIEL collected and sent to UoC, as well as to the Associated Beneficiaries CB and HB, data regarding inspections that took place in the Region of Crete from the Environmental Inspectors of YPEN, covering the period 2010-2015.

The objectives of Action A1, namely: a) examine and evaluate the current situation with regards to the prosecution of wildlife crime in N2000 areas in Crete; b) ELD implementation in Crete; c) the transmission of EU environmental directives for N2000 and wildlife crime requirements into national legislation; d) to fill the existing gap in our knowledge regarding EU and national environmental legislation about N2000 in Crete; e) to gather and analyse of judicial review procedures in Crete; and f) to incorporate the relevant data into the workshops, training seminars and communication strategy, were fulfilled in the best possible way.

6.1.2 Action A2: Communication Strategy

Foreseen start date: 01/01/2016

Actual start date: 01/01/2016

Foreseen end date: 30/09/2016

Actual end date: 31/12/2016

Action A2 was implemented with a 3-month delay regarding the time schedule of the project. Only small extra financial resources were needed for the 3-month extension taking into consideration the total costs incurred for the implementation of Action (total costs incurred for Action A2 were 9,822.57 € vs. 9,600.00 € foreseen in the proposal). The 3-month delay of Action A2 did not affect in any way (technically, legally, financially, organizationally) the implementation of other Actions.

The design of the project's logo was completed within April 2016, after an extensive communication and consultation between all project beneficiaries.

The creation of the Awareness Campaign messages were concluded in December 2016, as soon as the project's CoB received: a) the Report of the Baseline Survey (Action C1 – *Evaluation of the project effectiveness*) from the External Assistant; and b) the Final Report of Action A1 (*A review on current situation: An update on EU and national environmental legislation about NATURA 2000 in Greece and gathering and analysis of judicial review procedures statistical data in Crete*) from the responsible beneficiaries.

The proposed messages along with the main communication directions and priority axes were discussed between beneficiaries and were included in the Communication Strategy Plan, which was completed in December 2016. Orientation guidelines for the message and campaign material tailoring were developed and four (4) possible scenarios for the 2 TV Spots and 2 Radio Spots of Action B4 (*Local media as a tool towards awareness raising and educating*) were included in the Communication Strategy Plan.

The project's logo along with the LIFE and NATURA 2000 logos, as well as the labelling of European funding of the project were present on all material and on the website of the project since April 2016. The two (2) main messages of the project were also used in all the awareness raising, communication and dissemination activities since June 2021. For the printed and other information material, a common layout was used when possible.

6.1.3 Action B1: Environmental Law Observatory of East Crete

Foreseen start date: 01/10/2016

Actual start date: 01/09/2016

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action B1 was scheduled to start during the 4th trimester of 2016. However, preliminary preparations for the rental of appropriate premises, contracting of personnel and the purchase of necessary equipment were under way since early September 2016. The Environmental Law Observatory (ELO) of East Crete was in full operation since late November 2016.

The responsible Beneficiary for the implementation of Action B1 was the Heraklion Bar Association (HB). The HB employed the ELO Coordinator and the Assistant ELO Coordinator in October 2016. Contracting of personnel and purchase of necessary equipment were concluded in November 2016. Since then, the ELO of East Crete is active and operates daily. The office for the ELO of East Crete was located in the centre of the city of Heraklion.

The HB Coordinator applied for a special authorization to access the prosecution files for statistical use and drew up a plan for visiting the interrogation bodies responsible for the protection of the N2000 network areas. At the same time, the HB Coordinator recorded the environmental legislation that governs the N2000 protected areas, he monitored the progress

of the recorded cases and recorded the new cases of environmental degradation on the geoinformation map.

Every four months, the project team of the ELO of East Crete was checking and registering all published bills, acts, laws, technical regulations, ministerial or administrative decisions and public contracts referring to direct or indirect environmental management of the NATURA 2000 protected natural habitats of East Crete. In addition, analysis and compilation of cases already registered took place. Contacts with stakeholders, targeted audiences and the local community were made on a permanent basis.

Among the proposals made for promoting awareness of wildlife crime and biodiversity damage in NATURA 2000 areas, the ELO of East Crete suggested spatial planning for the natural and cultural environment to delimit unauthorized- and excessive economic activity in the countryside and the corresponding sea areas. It further suggested the institutionalizing of Environmental Prosecutors and Judges in each court of first instance, as well as the strengthening of the prosecution chain, by creating a special body of environmental police.

The ELO of East Crete achieved a high level of European, national and local networking with judges and prosecutors. Contacts were established with environmental prosecutors across Europe and international congresses were hosted in Heraklion Crete. Delegations from China, Australia and the US were acknowledged about crime mapping on Crete, the benefits of data sharing and the correlation of environmental crime with economic and electronic crime.

Although the ELO of East Crete had to deal with difficult to access stakeholder groups, significant results were accomplished inside and outside the insular borders of Crete. The HB Coordinator presented as invited speaker new ways of environmental auditing at the Hellenic Parliament. It reported the Ministry of Justice on the establishment of an environmental code during case filing. It reported the Ministry of Environment on the establishment of an Environmental Police Unit. Environmental crime was systematically recorded and Judges, Prosecutors and interrogation employees interacted in the HB workshops as never before.

The overall work of the ELO of East Crete during the whole reporting period (October 2016 – June 2021) is presented in the following **Table 6.1** and a more detailed report is available in the current **Final Report**.

The Environmental Law Observatory of East Crete will continue its operation during the After-LIFE Period (2021-2026). Monitoring of the environmental legislation, communication, visits, meetings, collaboration with partners and stakeholders will be held as was initially foreseen at the project's proposal.

TABLE 6.1: Consolidated table with the work of the ELO of East Crete.

Period	Cases checked	Environmental cases processed	No of authorities contacted	No of authorities' employees informed	No of lawyers informed	Events (organized/participations) - Related to Action D5	No of dissemination events - Other	No of attendants	No of requests for legal advices	Networking contacts - Related to Action D4
November 2016-September 2017	24,669	313	7	14	750	2	2	42	2	16
October 2017-December 2018	17,545	298	12	5	28	2	10	110	6	9
January 2019-June 2021	16,082	204	14	8	20	5	12	300	5	4
TOTAL	58,296	815	33	27	798	9	24	452	13	29

6.1.4 Action B2: Environmental Law Observatory of West Crete

Foreseen start date: 01/10/2016

Actual start date: 01/09/2016

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

The responsible Beneficiary for the implementation of Action B2 was the Chania Bar Association (CB). Action B2 was scheduled to start during the 4th trimester of year 2016, however, preliminary preparations were under way since early September 2016. The Environmental Law Observatory of West Crete (ELO of West Crete) is in full operation since late November 2016. No major delays and no changes to the established time schedule were encountered.

The ELO of West Crete began its operation on 01/10/2016 in a leased office near the Court of Chania. As Environmental Law Coordinator of the ELO of West Crete was appointed Mrs Maria Maniadaki, Lawyer, and as Assistant Environmental Law Coordinator was appointed Mrs Maria Daskalaki, Lawyer. Since the 1st of April 2019, the ELO of West Crete moved to a renovated office in the Court of Chania, which has been provided to Chania Bar Association free of charge. Until the reporting time, the ELO of West Crete operates in this office and it has been planned to continue its operation for the following 5-year of the After-LIFE period.

The ELO of West Crete during its operation participated in a range of actions. It collected data for environmental cases from the Penal Courts of West Crete and from administrative bodies, it studied the collected data, entered them in the project's geo-informatics map, monitored the environmental legislation, distributed informative material, questionnaires etc. It also prepared the technical and financial reports of the project at regular intervals, participated in all project meetings and submitted requests for co-financing to the Green Fund. Apart from these, the Environmental Law Observatory of West Crete was in constant contact with the Media as well as with state or private agencies and citizens.

The Environmental Law Observatory of West Crete, taking into account the experience of Action A1, was focused during the implementation of Action B2 on the effective collection and procession of data in cooperation with the Authorities, from which it was possible to derive complete, substantial and reliable data. Access to the data of the Administration was provided upon request, while the data of the Criminal Courts were collected after issuing special permits from the Personal Data Protection Authority. After the collection and procession of the collected data, the indexed cases concerning N2000 areas of West Crete or areas close to N2000 areas were entered in the geo-informatics map of the LIFE Natura Themis project, while their further procession through the map lead to useful conclusions. The

specific conclusions of the statistical data collected by the ELO of West Crete were presented during the project at various conferences, workshops, publications, meetings etc..

Every four months, the team of the ELO of West Crete checked and registered all published acts, laws, technical regulations, ministerial or administrative decisions and public contracts referring to direct or indirect environmental management of the N2000 protected natural habitats of West Crete. In this sense, the ELO of West Crete monitored during its operation more than twenty (20) related environmental laws issued in the respective period. Some of them, such as the revision of the Penal Code, have been publicly commented in Conferences and Articles of the Environmental Law Observatory of West Crete.

Finally, the ELO of West Crete developed a strong network with stakeholders, targeted audiences and the local community through permanent contacts.

The overall work of the ELO of West Crete during the reporting period is presented in the following **Table 6.2**.

TABLE 6.2: Consolidated table reflecting the work done by the ELO of West Crete.

Period	Cases checked	Environmental cases processed	No of authorities contacted	No of authorities' employees informed	No of lawyers informed	Events (organized/participations) - Related to Action D5	No of dissemination events - Other	No of attendants	No of requests for legal advices	Networking contacts - Related to Action D4
April 2016-September 2017	15,137	1,626	12	34	455	9	15	370	4	7
October 2017-December 2018	10,273	636	0	5	150	13	11	734	10	45
January 2019- June 2021	13,783	569	0	0	20	12	12	855	12	50
TOTAL	39,193	2,831	12	39	625	34	38	1,595	26	102

The Environmental Law Observatory of West Crete will continue its operation during the After-LIFE Period (2021-2026). Monitoring of the environmental legislation, communication, visits, meetings, collaboration with partners and stakeholders will be held as was initially foreseen at the project's proposal.

6.1.5 Action B3: Awareness Raising Activities: Workshops, Conferences and Smart Devices Application

Foreseen start date: 01/10/2016

Actual start date: 01/03/2016

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action B3 was scheduled to start during the 4th trimester of year 2016; however, HSPN initiated the **Sub-action of the Smart Devices Application** in March 2016. The application is in full operation since August 2017 (relevant milestone for the Application: October 2017).

The **Sub-action on the “National Conference in Heraklion”**, was concluded by the responsible beneficiary (UoC) within the foreseen timetable, namely during September 8-10, 2017; the Proceedings of the Conference in electronic format were issued on time. The printed version of the Proceedings of the Conference was delivered in early December 2017 and distributed during the project's implementation period.

The **Sub-action on the “International Conference in Athens”** was successfully implemented by HSPN in the foreseen timeframe (November 23-25, 2018). The Proceedings

of the International Conference were concluded in May 2020; 750 printed copies were delivered within June 2020, and almost all of them have been already distributed.

The **Sub-action on the “Final National Conference of the Project”** was organized online by UoC on June 2, 2021, with 11 lectures and more than 75 participants in total. The Proceedings of the Final National Conference (in electronic version) have been finalised in early June 2021.

The **Sub-action on the “16 (out of the 26) Workshops for the target audiences”** was implemented during the period October 2018 – April 2021 (the Sub-action has been modified after UoC’s proposal described in the Mid-term Report [31/10/2017], with EC/EASME consent).

The **Sub-action on the “6 Workshops (instead of 2) to investigating agents”** (the Sub-action has been modified after UoC’s proposal described in the Mid-term Report [31/10/2017], with EC/EASME consent) was concluded in November 2019.

The **Sub-action of the Smart Devices Application** of Action B3 started earlier. The HSPN initiated the sub-action in March 2016, with the subcontracting of the External Assistance through a procedure of multiple bids. The final design of the Application was provided by the contractor in August 2017 who also proceeded to build the BETA version of the application, accompanied by the public site. The domain name (**app-naturathemis.gr**) was secured, and the site has been developed and it is accessible by the public. The domain is managed by administrators, who have authorization to change the status of each complaint, and to inform the relevant authorities regarding the specific content of the complaint by email automatically. At the same time a message is sent to the user, informing him/her about the status of the complaint.

The Application increased environmental damage and/or crime reporting, as citizens are often wary to report such matters to the authorities, because of the cumbersome and time-consuming procedures involved. The Application enabled prompt reporting of environmental damage and the establishment of a relevant database. The Application has been broadly advertised and promoted through the dissemination activities of the project (leaflet, website, seminars, workshops, conference, paid advertisements etc.).

The Smart Devices Application is in full operation from August 2017. Until June 2021, the Application has been downloaded by **1900 users** (1080 Android and 820 iOS users) all over the Greece, from which **381** are **active** (209 Android and 172 iOS).

From August 2017 to April 2021, **271** complaints were submitted, **187** of which were valid and **84** were invalid. From the valid complaints, **178** were forwarded to the competent authorities. The **remaining 9** complaints were not sent to the authorities on the grounds that they reported the same environmental offences with previous complaints.

From the 178 complaints that were forwarded by HSPN to the relevant authorities, the issue was resolved in only 31 cases. Furthermore, out of the 31 restoration cases, 5 cases were recorded in NATURA 2000 Network and 3 cases in Wildlife Refuges and Island Wetlands. On resolution cases is included a case of locating the offender where a 2,000 Euro penalty is imposed on him.

Additionally, YPEN-COIEL during LIFE Natura Themis Application operation, has contacted with the responsible Departments/Services of either the Decentralized Administration Authority of Crete (DAAC) or the Region of Crete, sending relevant administrative documents concerning the progress and outcome of 24 cases. In 2 of these cases, the competent authorities replied that damages had been remediated. The Greek Ombudsman also played a significant role on promoting and mobilization of the authorities for the rehabilitation of the affected areas.

Project team and especially HSPN's experts organized two meetings with OFYPEKA, in order to inform them about the operation of the application and its results. OFYPEKA confirmed their willing to continue the operation of the application and use for all Greece.

The Sub-action has been presented, promoted and advertised in different ways throughout the project's implementation period. It is considered one of the main replicable actions of the LIFE Natura Themis project.

The **2-day National Conference** entitled: "Environmental Liability, Prevention and Remediation: Challenges and opportunities for Biodiversity Protection in Greece" was organised by UoC on 8-10/09/2017, in Heraklion, Crete.

The Proceedings of the Conference in electronic format were issued within October 2017 and were available in the webpage of the Conference. The printed version of the 292-page Proceedings was delivered in December 2017 (750 hard copies); all of them have been already disseminated through project's awareness Actions.

The **3-day International Conference** on "International Perspectives on Preventing Wildlife Crime" has been successfully implemented by HSPN on November 23-25, 2018, in Athens. More than 134 participants attended the 26 lectures and received the printed material of the Conference.

The LIFE Natura Themis project was presented by all project beneficiaries with 5 different oral presentations. The event has been promoted in all national media, while an interview to the national TV Channel "SKAI" has been given by the Coordinator of the CB.

Regarding the Book of Proceedings of the Conference and due to some delays in receiving all the Abstracts from participating lecturers, the edition was finally printed in June 2020; 500 copies have been already distributed to the lecturers, participants, partners and stakeholders. The Book of Proceedings was also uploaded in the project's web page as foreseen in the description of the Action.

Regarding the **foreseen workshops of the project** (totalling to 26 in the initial proposal addressed to local media journalists, rural population, tourism professionals, lay public and investigating agents), the sub-action started on time and two (2) workshops were organised in October and December 2018, respectively. For the rest implementation period (2019-2021) of the project, UoC that was responsible for the organization of twenty six (26) workshops in total under Action B3, proposed the modification of the Action as follows:

- a) 16 workshops addressed to local media journalists, rural population, tourism professionals and lay public (instead of 24 workshops foreseen in initial proposal).
- b) Six (6) workshops addressed to investigating agents (instead of 2 workshops foreseen in initial proposal)
- c) One (1) additional National Conference to be held during the last year of the project (1st trimester of 2020) in Crete.

The proposal for the modification has been accepted with the consent of the Project Advisor of EC/EASME (this issue was also discussed and agreed during the project visit by EC/EASME and EMT/NEEMO, which took place in Heraklion, Crete, May 14-15, 2018).

The overall work done concerning the Sub-action of workshops for local media journalists, rural population, tourism professionals and lay public during the whole period is presented in the following **Table 6.3**.

TABLE 6.3: List of the 16 workshops addressed to target audience organised by UoC.

Workshops for Target Audiences	Date of implementation	Place of the Event	No of Oral Presentations	Attendants
1 st Workshop	12/11/2018	Melidoni, Municipality of Mylopotamos	6	46
2 nd Workshop	16/12/2018	Krya Vrysi, Municipality of Agios Vasileios	6	78
3 rd Workshop	26/02/2019	Palaikastro, Municipality of Sitia	5	64
4 th Workshop	06 /03/019	Zaros, Municipality of Festos	6	58
5 th Workshop	19/07/2019	Mochos, Municipality of Chersonissos	6	42
6 th Workshop	18/10/2019	Mesa Lasithi, Municipality of Oropedio	6	75
7 th Workshop	01/11/2019	Kissamos, Municipality of Kissamos	6	58
8 th Workshop	18/12/2019	Charakas, Municipality of Archanon Asterousion	6	44
9 th Workshop	20/12/2019	Kastamonitsa, Municipality of Minoa Pediadas	5	34
10 th Workshop	29/01/2020	Arvi, Municipality of Viannos	6	40
11 th Workshop	05/12/2020	Sarchos, Municipality of Malevizi	6	42
12 th Workshop	06 /03/2020	Pemonia, Municipality of Apokoronas	5	40
13 th Workshop	10/07/2020	Kandanos, Municipality of Kandanos-Selino	6	40
14 th Workshop	24/02/2021	On line	4	93
15 th Workshop	07/04/2021	On line	5	107
16 th Workshop	17/04/2021	On line	5	81
TOTAL				942

As it was mentioned before, six (6) **Workshops for Investigating Agents** (instead of 2) were organised in Chania, Rethymno, Heraklion, Agios Nikolaos, Ierapetra and Sitia, respectively, within November 2019. In total, 164 officers and employees of the island's Forestry Services, Police, Fire Service, Coast Guard, Region of Crete, and local Municipalities attended the events. Most of the participants pointed out the complexity of the legislation and the consequent incorrect or incomplete drafting of the case files and expressed the wish for specific manuals with specific legal guidelines. The Coordinating Beneficiary (UoC) decided to provide an extra technical manual addressed to Investigating Agents, which has been concluded in the framework of the Action D5.

In **Table 6.4** we summarise the outcomes of the specific sub-action.

TABLE 6.4: List of the 6 workshops addressed to Investigating Agents organized by UoC.

Workshops for investigating agents	Date of implementation	Place of the Event	No of Oral Presentations	Attendants
1 st Workshop	18/11/2019	Sitia, Municipality Hall	7	28
2 nd Workshop	19/11/2019	Ierapetra, Municipality Hall	7	22
3 rd Workshop	20/11/2019	Agios Nikolaos, Lassithi Chamber of Commerce	7	26
4 th Workshop	27/11/2019	Chania, Chamber of Commerce and Industry	7	35
5 th Workshop	28/11/2019	Rethymno, Youth Centre	7	23
6 th Workshop	29/11/2019	Heraklion, Exhibition Halls of UoC-NHMC	7	30
Total				164

Regarding the sub-action of the additional **National Conference**, this was organised on June 2, 2021. Due to mitigation measures for the Covid-19 pandemic, the **Final Conference of the Project** under the title: “Environmental Crime: LIFE Natura Themis Review and Report”, was held online. More than 75 people attended the programme, which included eleven (11) oral presentations. In addition to stakeholders and target groups, the closing conference was addressed to the general public and to project associates who followed its progress and supported its activities over the years that it was operated.

For all the awareness raising events of the project, a special portfolio and material has been produced and disseminated, including: a) 1 folder in 1,000 copies printed during May-June 2017 and reprinted in 1,000 additional copies during January 2019; b) 1 notepad A5-size printed in 1,000 copies during January 2019; c) 1 cloth bag produced in 1,000 pieces during October 2019; and d) other material necessary for the events (pencils, pens, tags for delegates, envelopes, etc.).

All events have been promoted to local media with relevant Press Releases, posts in project’s website and official Facebook page, invitations to relevant authorities, bodies, services, stakeholders and through the mailing list of the project.

Action B3 in total concluded successfully within the established timeframe. Its outcomes are summarised in the infographic that follows hereafter:

Action B3 outcomes

Sub-action 1: Application for Smart Devices
Sub-action 2: One 2-day National Conference
Sub-action 3: One 3-day International Conference
Sub-action 4: One Final Conference
Sub-action 5: 16 workshops for target groups
Sub-action 6: 6 workshops for Investigating agents

App: 1,900 users

381 active users
271 complaints submitted
24 cases resolved

2 National Conferences

280 attendees
42 oral presentations and 12 posters
750 copies of proceedings distributed

1 International Conference

140 participants
26 lectures
500 copies of proceedings distributed

16 Workshops for public

942 participants
89 lectures

6 Workshops for investigating agents

164 participants
42 lectures

6.1.6 Action B4: Local media as a tool towards awareness raising and educating

Foreseen start date: 01/10/2015

Actual start date: 01/10/2015

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action B4 was implemented by UoC, in cooperation with the Associated Beneficiaries and according to the foreseen schedule. No major delays and no changes have been encountered.

Concerning the outputs of Action B4, **thirteen (13)** out of ten (10) press articles have been published, all the **three (3) press conferences** were held, and production of the **two (2) TV Spots** and the **two (2) Radio Spots** has been concluded on time.

Moreover:

- More than 25 Press Releases concerning events' announcements and/or results were distributed to the national and local media on the occasion of various events and activities of the project;
- 27 interviews had been given by partners in various occasions;
- more than 20 independent publications (articles, refers, posts, reports in newscasts etc.) by local and national Media have been made for the project;
- 3 printed advertisements had been paid by the Coordinating Beneficiary (UoC);
- 18 special editions for the project have been distributed by Associated Beneficiaries (17 by HSPN and 1 by HB); and
- 19 independent references/reports to the Press has been occurred.

All **Press Articles** of the project are summarized in the following Table 6.5.

Table 6.5: List of the 13 Press Articles issued by the Project.

A/A	Issued by	Type of edition	Title and/or Description	Date of publish	No of publications	No of reposts/reprints	Relevant Report (Annex-Appendix)	Estimated response to publication
1	CB	1st Press Article of the Project	From Easter Island in the island of Crete and from ancient Greece in a "modern" Themis	October 2016	4		MtR - Annex Action B4 - Appendix 2	29,791
2	CB	2nd Press Article of the Project	The role of the Environmental Law Observatories in environmental information. From the BIG DATA of the modern globalised society to the NO DATA of the Greek reality	February 2017	2		MtR - Annex Action B4 - Appendix 2	15,194
3	CB	3rd Press Article of the Project	More laws, less (environmental) justice	April 2017	2	3	MtR - Annex Action B4 - Appendix 2 & Appendix 8	58,500
4	CB	4th Press Article of the Project	Summer holidays with... environmental awareness	July 2017	1		MtR - Annex Action B4 - Appendix 2	10,341
5	HB	5th Press Article of the Project	Restrictions in drafting indictments and <i>de lege</i> termination of green crime prosecution	March 2018	1		2nd PR - Annex Action B4_Appendix 2a	N/A
6	CB	6th Press Article of the Project	Inefficient protection of <i>Caretta caretta</i> in Crete	June 2018	2		2nd PR - Annex Action B4_Appendix 2b	15,194

A/A	Issued by	Type of edition	Title and/or Description	Date of publish	No of publications	No of reposts/ reprints	Relevant Report (Annex-Appendix)	Estimated response to publication
7	HB	7th Press Article of the Project	Statistical and Legislative View of Environmental Crime	October 2018	1		2nd PR - Annex Action B4_Appendix 2c	N/A
8	UoC	8th Press Article of the Project	Environmental Liability: right and obligation of all citizens	December 2018	1		2nd PR - Annex Action B4_Appendix 2d	80,000
9	UoC	9th Press Article of the Project	Outdoor activities and responsibility for the environment	December 2018	1		Final Report - Deliverable Action B4 - 01	1,200
10	UoC	10th Press Article of the Project	Clean water: citizen's right and liability	June 2019	1		Final Report - Deliverable Action B4 - 01	80,000
11	HB	11th Press Article (extra of the proposal)	Fires and revision of forest maps directly threaten the environment of Crete	August 2020	1		Final Report - Deliverable Action B4 - 01	8,571
12	CB	12th Press Article (extra of the proposal)	Environmental crimes and penalties in Greece	November 2020	2		Final Report - Deliverable Action B4 - 01	15,194
13	CB	13th Press Article (extra of the proposal)	Environmental crimes of the gender... male	December 2020	3		Final Report - Deliverable Action B4 - 01	16,459
TOTAL								330,444

Regarding the **sub-action “2 Radio spots and 2 TV spots”**, the CoB produced the two (2) TV spots and the two (2) Radio spots during August 2017. The TV spots were uploaded at the YouTube page of the UoC-NHMC, as well as in the project's website (<http://www.lifethemis.eu/el/content/tvradiospots>) in September 2017 and were also promoted through the project's Facebook page. The 2 TV-Spots are subtitled in English, as was foreseen, they clearly display the project logo, project messages, the LIFE and NATURA 2000 logos, and they clearly refer to the project's co-financing from the EU. Their duration is 40 seconds (the same for the 2 Radio Spots).

The Radio and TV Spots have been broadcasted in local and national media in Crete during the 3rd, 4th and 5th year of the project (2019-2021).

The **Sub-action “Three Press Conferences”** was completed in the scheduled timeframe. More specifically:

- The **1st Press Conference** of the project was held in Chania on December 5, 2016, along with the 2-day Meeting of the PSC.
- The **2nd Press Conference** of the project took place in Heraklion on May 14, 2018, along with the 2-days Meeting of the PSC and the EC-EASME/NEEMO Visit to the Project (May 14-15, 2018).
- The **3rd Press Conference** of the LIFE Natura Themis project took place via teleconference (Webex Platform) on March 29, 2021. UoC Project Coordinator, Dr M. Probonas, and HB Coordinator, Dr G. Sbokos, participated in person in UoC – NHMC's Premises in Heraklion, while all other project beneficiaries participated through the Webex Platform. The interview was covered live by one (1) TV Station and with remote participation by one (1) Newspaper. Before the beginning of the Press Conference, a live broadcast was made on the TV Channel “ET3” (Thessaloniki). A Press Release was send

to all mass media of Crete few hours after the end of the Press Conference and an interview was given later in the same date.

Action B4 was successfully concluded in the provided timeline, far exceeding the targets and indicator set. Work with local media will continue during the After-LIFE period of the project.

6.1.7 Action B5: Training Seminars

Foreseen start date: 01/10/2016

Actual start date: 01/12/2016

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action B5 started within the 4th trimester of 2016, specifically in December 2016, with the preparation of the 1st Training Seminar for the environmental NGOs of Crete. In total eight (8) out of the nine (9) Training Seminars of the action have been organized. The 3rd Training Seminar addressed to judges and state prosecutors (in the Grand Agreement it was scheduled to take place in Athens) was planned by the responsible AB YPEN-COIEL to take place in Thessaloniki during May 2020 as was proposed by the member of ComExp, Mrs. Kallia Antoniou (and agreed by rest beneficiaries), in order to encourage the judiciary of the northern regions of the country to participate. However, the exact date of this seminar was reconsidered, regarding the evolution of the COVID-19 pandemic in Greece, the restrictions about traveling and the low participation in this kind of events during summer season. Partners discussed the possibility of the seminar taking place in November or December 2020 but for one more time the health crisis developed unfavorably for the organization of any event. The second lockdown of the COVID-19 pandemic in Greece started from November 2020 and finished in May 2021. Among other things, YPEN-COIEL was not able to organize an online seminar due to lack of technical equipment and experienced technical staff to support such an event.

The 1st Training Seminar of the project took place on March 11, 2017 in Heraklion.

The YPEN-COIEL organised two (2) training seminars for lawyers in Chania and Heraklion, on November 29 and 30, 2017, respectively.

YPEN-COIEL organised also two (2) Training Seminars during April 2019, i.e. the 1st Training Seminar addressed to Judges and Prosecutors took place in Heraklion on April 10, 2019; and the 1st Training Seminar for Public Servants, which was organised also in Heraklion on April 11, 2019.

On November 11, 2019, HSPN organised the 2nd Training Seminar for Environmental NGOs in Athens.

The 3rd Training Seminar addressed to lawyers of Athens and the 2nd Training Seminar addressed to judges and prosecutors of Athens took place in Athens, on 03/12/2019 and 04/12/2019, respectively.

All the events has been promoted to the local and national media with the release of Press Releases, posts in project's website and official Facebook page, invitations to relevant authorities, bodies, services, stakeholders and through the mailing list of the project while project's information and promotional material has been disseminated. The conclusions of the Training Seminars were sent to the corresponding participants and were posted with the presentations in project's website in the field Deliverables-Education.

The outcomes of Action B5 are summarised in **Table 6.6** below.

TABLE 6.6: Outcomes of Action B5.

Training Seminars Action B5					
A/A	TRAINING SEMINAR FOR	DATE	No OF LECTURES	No OF PARTICIPANTS	RESPONSIBLE BENEFICIARY
1	NGOs HERAKLION	11/3/2017	10	60	UoC-NHMC
2	LAWYERS IN CHANIA	29/11/2017	8	48	MoEE-COIEL
3	LAWYERS IN HERAKLION	30/11/2017	8	31	MoEE-COIEL
4	JUDGES/PROSECUTORS HERAKLION	10/4/2019	12	42	MoEE-COIEL
5	ADMINISTRATIVE OFFICERS HERAKLION	11/4/2019	12	75	MoEE-COIEL
6	NGOs ATHENS	11/11/2019	12	43	HSPN
7	LAWYERS ATHENS	3/12/2019	8	60	MoEE-COIEL
8	JUDGES/PROSECUTORS ATHENS	4/12/2019	8	59	MoEE-COIEL
TOTAL			78	358	

6.1.8 Action B6: Production of Technical Guides

Foreseen start date: 01/10/2016

Actual start date: 01/12/2016

Foreseen end date: 30/09/2018

Actual end date: 30/04/2019

The implementation of Action B6 started within the foreseen timetable of the project, specifically in December 2016. The HSPN's experts identified the specific information needs of the different target audiences of the guides in order to best design their content, taking into consideration results from Actions A2 and C1, and started formulating the required questionnaires.

There was a delay in the production of the three Technical Guides due to the resignation of Mr. Giorgos Politis, Lawyer and Secretary General of the HSPN's Board. After some rearrangements and changes in the assignments for the writing of the Technical Guides, HSPN's project team managed to overcome the delays and the three Technical Guides concluded in February 2019 and were uploaded to the project's website immediately. The hard copies of the respective Technical Guides were received within March 2019 and their distribution by all partners started in April 2019.

Except the dissemination of the Technical Guides in project's events the books were distributed to a wide number of local and national authorities/public services, NGOs, Management Bodies, to the Bar Associations of the country and to various judiciary's associations, police, coast guard and fire services as well as through the Exhibition Halls of the Natural History Museum of Crete and the ELOs. All remaining copies will be distributed during the After-LIFE period.

All books are also available in PDF format for free downloading in project's website (<http://www.lifethemis.eu/el/content/technicalguides>).

6.1.9 Action C1: Evaluation of the project effectiveness

Foreseen start date: 01/10/2015

Actual start date: 01/10/2015

Foreseen end date: 30/09/2020

Actual end date: 30/09/2020

Action C1 started on time according to the project schedule. The Baseline Survey was conducted during the period 01/10/2015 to 30/09/2016. The statistical/quantitative analysis of all collected questionnaires was completed and submitted to the CoB on November 11, 2016. Upon receipt of contractor's Final Report of the Baseline Survey, further processing and

synthesis of the results was carried out by the Communication Coordinator and the Communication Officer of the UoC.

The preparation for the implementation of the Midterm Environmental Awareness Survey has been initiated as envisaged and the call-for-tenders procedure for the contractor of External Assistance was concluded (January 2019). The relevant contract with the External Assistant signed in early February 2019 and the distribution of the questionnaires to stakeholders and targeted audience was on track within February 2019. The contractor delivered the quantitative and qualitative analysis on December 9, 2019.

From the evaluation of the 2nd Evaluation Survey (Action C1) and the comparative report between the two surveys presented in the Action's Deliverable, the obvious improvement of knowledge and views of the local community of Crete emerges. Positive change of attitudes and perceptions of the EU Directive on Environmental Liability implementation, the need to deal effectively with environmental crimes and the importance of protecting the environment and wildlife was observed over time. These issues were thus successfully highlighted and promoted through the LIFE NATURA Themis project.

Action C1 completed successfully within the proposed timeframe.

6.1.10 Action C2: Socio-economic impact of the project actions

Foreseen start date: 01/04/2019

Actual start date: 01/04/2019

Foreseen end date: 31/03/2021

Actual end date: 31/03/2021

Action C2 started within the 2nd trimester of 2019. HSPN started preparing the methodology for the elaboration of the indicators for the assessment of the socio-economic impact of the project actions. During the spring of 2019, HSPN experts conducted interviews with relevant stakeholders in Crete, then questionnaires were distributed and data were collected from relevant authorities (Municipalities, Courts, Protected Area Management Bodies, Chambers of Commerce, Hotel owners etc.). The contractor's final version of the study was received in early December 2020. The project team evaluated the study and the Action's Deliverable was ready within schedule (deadline: 30/03/2021 according to Amendment No3).

The report on the socio-economic impact of the project actions was twofold. Firstly, the study tried to monetarise the impact environmental crimes have on NATURA 2000 sites, as these lead to environmental degradation and consequently a loss of socio-economic benefit. Secondly, the Deliverable aimed at highlighting the importance of the LIFE Natura Themis actions and how these actions contributed to the achievement of the main goal of the project, i.e., the effective response to environmental violations in the Region of Crete.

The first aim of the survey was achieved with no special constraints or problems. Four (4) of the main environmental crimes occurring in Crete, mainly in the protected areas of NATURA 2000 Network, namely forest violations-arsons, illegal dumping of waste, illegal grazing and illegal building, as identified by Action A1 and the ELOs (Actions B1-B2) and presented in the geoinformation map of project website, were studied in the economic valuation level (study period 2013-2019). This part of the survey is considered very important by the ABs, as for the first time the cost of the damage resulting from specific environmental crimes is recorded and valued. This can be very useful, both for information/awareness purposes and for exercising influence at the political level, even locally.

The second aim of the survey encountered some obstacles to low participation in the interviews and especially in the completion of the questionnaires. For the interviews three target groups were selected to participate: lawyers (9 participants), members of NGOs (3

participants) and representatives of the municipalities, the Crete Region and the Decentralized Administration Authority of Crete (7 participants). The questionnaires were addressed to the tourism professionals and they were distributed just a few months before the outbreak of the Covid-19 pandemic. Given that the tourism sector has been hit hard from the restrictive measures due to the pandemic, it is reasonable for hoteliers to prioritize the viability of their investment, and not have time to complete questionnaires considering environmental issues less important at this time. Only 15 questionnaires were filled.

Although the survey sample is considered low and therefore not indicative, the results of processing the interviews and the completed questionnaires match, to a large percentage, the conclusions of the surveys carried out within Action C1.

6.1.11 Action D1: Notice Boards

Foreseen start date: 01/10/2016

Actual start date: 01/10/2016

Foreseen end date: 30/09/2017

Actual end date: 31/01/2018

Action D1 has been concluded. A minor delay has occurred due to a delay in the tendering procedure for the External Assistant, the specifications for their construction (special terms and characteristics for optimum harmonisation with the natural environment) and delays in the issue of required permits from the competent authorities for their placement.

The construction of the five (5) Notice Boards of the Project finalized within December 2017. All of them were erected during the last week of December 2017 and mid-January 2018 in the selected positions which are highly visited during summer, while the areas of Ierapetra and Rethymno are also visited by many people during winter time too. All of them combine the vicinity to a Cretan NATURA 2000 site and the concentration of permanent population and visitors/tourists. In addition, these places are subject to significant man-made pressures and they present high environmental delinquency according to the results of Actions A1, B1 and B2. Till today (June 2021) all Notice Boards are in the same position without being damaged or vandalized and will remain at least till the end of the After-LIFE period (May 2026).

Despite a 4-month delay in the completion of the Action, it is considered not to affect the major outcomes of the project and that the quality of the products compensated for the time loss (instead of September 2017 the Notice Boards were erected in early December 2017, period that it is out of the mass tourist period anyway).

We estimate that until the end of the project, the foreseen visibility of the project connected with this Action (5,000 people in the proposed indicators) has been exceeded the 130,000 people.

6.1.12 Action D2: Project website

Foreseen start date: 01/10/2015

Actual start date: 01/10/2015

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action D2 started in accordance with the project schedule. Its implementation continued smoothly to this day and will remain active till the end of After-LIFE period (May 2026). The website of the project, www.lifethemis.eu, was launched in late March 2016. The creation and content design of the geo-information map within the project's website is in full operation since November 2016, while updating of information has being addressed in regular basis.

All visibility requirements of the EC have been fulfilled. The website was updated in a regular basis with all the news from project's actions, while in a separate field all deliverables of the

project (e-Newsletters, proceedings, printed and electronic material, reports, articles etc.) are available.

All news, announcements etc. have been sent automatically every four (4) months as an electronic newspaper (e-Newsletter, see also Action D5) to more than 3,000 e-mail addresses.

In total the website has more than **95,000 pageviews** and more than **41,800 users** (visitors) for the reporting period (October 2015-June 2021, start counting website statistics from April 2016).

The project Facebook page (<https://www.facebook.com/lifethemis>) [LIFE Themis] was created in November 2016 and it was regularly updated with all project news and various posts relevant to the project's objectives. Until the end of the project (30/06/2021), **1,102** people liked and **1,185** followed the **385** posts of the project Facebook page while more than **23,000** people have been attracted by just **five (5) publications**.

The website and the Facebook page of the project will be in operation at least until the end of the After-LIFE period (30/06/2026).

6.1.13 Action D3: Layman's report

Foreseen start date: 01/04/2020

Actual start date: 01/04/2020

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action D3 started on time within the 2nd trimester of 2020 and concluded according to the time schedule. The Layman's Report of the LIFE Natura Themis project was edited and designed in a 32-pages book of A4 format, bilingual, and printed in 1,000 copies within June 2021. The electronic format of the book has been already posted in project's website (<http://www.lifethemis.eu/el/content/laymans-report>).

The Layman's Report presents to the general public the project, its objectives, its actions and its results. Dissemination of the printed copies to project beneficiaries, stakeholders, members of ComExp, relevant authorities & public services has been initiated in late June 2021 (in total 210 copies has been distributed so far to national NGOs, Municipalities of Crete, fire services of Crete, port authorities of Crete, Bar Associations of the country, Management Bodies of the NATURA 2000 protected areas of the country, etc.). The distribution of project's Layman's Report will be continued throughout the After-LIFE period of the project.

6.1.14 Action D4: Networking with other LIFE and non-LIFE projects

Foreseen start date: 01/10/2015

Actual start date: 01/10/2015

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action D4 was effectively implemented according to the established time schedule, no major delays had been encountered and no changes to the established time schedule were made.

The key networking contact groups, bodies, agencies and projects already provided for in the programme proposal were added to via all the partners' collaboration networks, personal contact between project team members and stakeholders, as well as partners' personal contacts with other LIFE and non-LIFE programme co-ordinators and project leaders participating in international meetings, conferences, seminars, workshops and visits. There were also direct networking invitations, collaboration agreements signed with specific programmes and research or agency networks involved in implementing the Environmental Liability Directive and environmental legislation in general. This network has been added to a

large number of contacts established via project information and promotion activities implemented within the Actions B3, B4 and D5 of the project.

In total, the LIFE Natura Themis project developed synergies with **25 LIFE projects** and **3 non-LIFE projects**, established networking contacts in **32 different events** (international and national) and with **26 various bodies**, educational and scientific institutions, professional associations and NGOs all over Europe and elsewhere.

In total **seven (7) declarations** of cooperation have been signed and **five (5) in person and one (1) online** networking visits took place during the implementation period of the LIFE Natura Themis project.

During the period January 2019 – June 2021, the LIFE Natura Themis project made more than **30 networking activities**.

Experience exchange, participation, synergy strategies, transferability and replicability of knowledge and know-how regarding the project's aims and goals were also transversally achieved across some of the other project's Actions (for example, please see Actions B1, B2, B3, B4, D2 and D5).

The whole work done during the implementation of this action is presented in the following infographic and in project's Deliverable **Replication Plan**, which is available in project's website (<http://www.lifethemis.eu/el/content/ReplicationPlanDeliverableActionD4>) and will be distributed in **435** e-mail addresses all over the country and Europe. The lists of agencies, bodies, foundations, professional networks, forums, LIFE and non-LIFE projects etc. to which the Replication Plan will be sent are non-exhaustive and will be enriched during the next five years in order to expand its distribution and consequently the experience of the project to a wider audience.

Networking activities and contacts will continue during the After-LIFE period, as is presented in the After-LIFE Communication Plan of the project.

Outcomes of Action D4 can be overviewed in the infographic that follows:

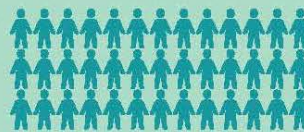
NETWORKING ACTIONS

Action D4

RESULTS OF NETWORKING ACTIVITIES WITH OTHER LIFE AND NON-LIFE PROJECTS

1,000 PEOPLE

interact with the project LIFE Natura Themis networking activities



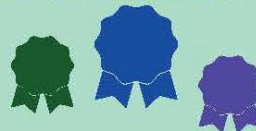
NETWORKING VISITS **6**



networking visits took place during the implementation period (5 in person and 1 online)

7 NETWORKING DECLARATIONS

declarations of cooperation have been signed between LIFE Natura Themis & other LIFE Projects



DELIVERABLE **1**



Replication Plan has been prepared and distributed to more than 400 relevant collaborators

IN TOTAL

Networking contacts have been made with 25 LIFE and 3 non-LIFE Projects, with 26 scientific or professional national and international authorities, bodies, institutions, associations, networks, fora, universities, NGOs etc. Partners participated and presented the project in 32 different events

6.1.15 Action D5: Dissemination of the project and its results

Foreseen start date: 01/10/2016

Actual start date: 01/10/2016

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action D5 started within the established timetable and concluded with no delays or obstacles by the end of June 2021. The **project's leaflet** has been produced in Greek (2 times) and English, and it was distributed to all possible occasions; **fourteen (14)** out of the twelve (12) foreseen e-Newsletters have been issued and circulated to more than **3,000** e-mail addresses; the project **banner** was produced in December 2016 and **four (4)** more banners were designed and produced for the needs of the ABs. Beneficiaries organised or presented the project and its results or participated or disseminated project's material in more than 129 events in which the attendees exceeded 12,300 people.

More specifically:

Project's **banner** production started during October 2016 and finalized in December 2016. After a request from the ABs HB, CB and HSPN three (3) more banners were produced till May 2017 while one more banner, the 5th one, was produced by YPEN-COIEL in November 2017.

The **leaflet** was finalised by the end of 2016, while the printed material (10,000 copies of the leaflet) was delivered to the UoC within April 2017. Three thousand (3,000) copies of the updated leaflet were reprinted in a smaller size by the Coordinating Beneficiary during April 2021, while the **English version** of the leaflet was produced during May 2018 (3,000 copies).

Fourteen (14) e-Newsletters has been issued and circulated during project's implementation period. The **1st e-Newsletter** was delivered to more than 2,300 recipients on January 17, 2017, and the **last (14th) issue** was delivered on April 14, 2021, to more than 3,500 recipients. An extra issue (issue 2a) was published on August 5, 2017, with special reference to the National ELD Conference of the project.

During the period October 2015 – September 2017, the project has been presented in **22 events** and were promoted through **twelve (12)** events organised/co-organised by the Beneficiaries and one (**1**) local festival organised by the Municipality of Archanes-Asterousia.

During the period October 2017 – December 2018, the project has been presented in **31 event**. For the same period, the LIFE Natura Themis project was promoted by ABs through the participation or project's material dissemination in **twenty four (24)** non-LIFE events.

Regarding the period January 2019 – June 2021 and given that in person gatherings banned for almost the whole period of March 2020 to May 2021 (excluding the periods: May – October 2020 & June 2021), project beneficiaries organised awareness events, and/or presented the project, and/or participated, and/or disseminated project's information and promotional material in **34** different occasions within LIFE project and in **8** activities out-side LIFE

For most of the events a description with all relevant material was uploaded to the project website, as well as to the Facebook page of the LIFE Natura Themis project.

Furthermore, the CoB produced and distributed **an extra Technical Guide** addressed to Investigating Agents under the title: **“Technical Guide to address the most frequently prosecuted offenses against the environment in Crete”**. This book was published in early November 2020 in 1,500 copies. All copies were distributed by mid-January 2021 to relevant authorities and bodies all over the country. A second publication of 750 more copies took place within February 2021 and half of the Technical Guides were sent in other relevant public services and authorities of Greece.

In total, more than **4,500** persons have been informed and became aware about “green crime”, the environmental liability for biodiversity damage and nature protection tasks through Action D5 during the period January 2019 – June 2021.

The implementation of the Action has not met any major constraints due the whole period of project’s implementation. The results are considered more than sufficient. Dissemination of the project and its results will continue within the After-LIFE period of the project.



6.1.16 Action E1: Project management

Foreseen start date: 01/10/2015

Actual start date: 01/10/2015

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action E1 was implemented according to the project timeline.

All beneficiaries have appointed members to their Working Groups for the LIFE Natura Themis project.

Reporting of the LIFE Natura Themis project was sent to EC/EASME according to the following **Table 6.9**:

TABLE 6.9: Reporting of the LIFE Natura Themis project to EC/EASME.

A/A	Report Type	Sending Date	Covering Period
1	1 st Progress Report (1 st PR)	27/10/2016	01/10/2015 – 31/10/2016
2	Mid-term Report (MtR)	31/10/2017	01/10/2015 – 30/09/2017
3	2 nd Progress Report (2 nd PR)	05/02/2019	01/10/2017 – 31/12/2018
4	3 rd Progress Report (3 rd PR)	08/01/2020	01/01/2019 – 31/12/2019
5	4 th Progress Report (4 th PR)	25/01/2021	01/01/2020 – 31/12/2020
6	Final Report (FR)	30/09/2021	01/10/2015 – 30/06/2021

An official letter to the Project Advisor of EC / EASME was sent by the Coordinating Beneficiary (UoC) on September 10, 2018, asking for EC's formal opinion about the impacts of the GDPR implementation in the operation of the geo-information map. The Project Advisor informed the Coordinating Beneficiary that the competent authority to reply on this issue is the Hellenic Data Protection Authority (HDP). Having made a trial to contact the HDP, the UoC found out the HDP's Decision No. 52/2018/28.06.2018 that declares that HDP has no responsibility in answering questions regarding the implementation of the GDPR and that all relevant requests that are either under investigation or those that will be asked in the future will be archived. For that reason, UoC addressed its request for the issue to the UoC's responsible contact point for the implementation of the GDPR.

The Coordinating Beneficiary (UoC) addressed a request to EC/EASME for the Amendment of the Grant Agreement (GA) Number LIFE14 GIE/GR/000026 – LIFE Natura Themis, asking the prolongation/extension of the project for a 9-month period, i.e. new end date of the project to be on 30/06/2021 (instead of 30/09/2020 as it was provided in the original project's proposal). The Amendment to the GA Number LIFE14 GIE/GR/000026 – LIFE Natura Themis was accepted and relevant Letter of Amendment No 3 was sent on September 30, 2020.

The request for non-substantial financial changes (for UoC, HSPN and HB), which was forwarded to EC/EASME on November 11, 2020, was accepted by EC/EASME and an electronic message for the issue was received on November 29, 2020.

The Quality Control Mechanism (QCM) and the creation of the Committee of 3 Experts (ComExp) started on time; however, the ComExp composition was only finalised in early January 2017. A very unpleasant event forced the Coordinating Beneficiary (UoC) to proceed with a change in the composition of the ComExp, since Ioannis Sagias, member of the Committee of Experts (ComExp), passed away on July 15, 2020. He was replaced by Mrs. Dafne Filippaki, the new Assistant of the Greek Ombudsman, on October 8, 2020. The new member of the ComExp was informed in due time about project's implementation and received copies of all project's material (printed and/or electronic).

The delay in the establishment of the ComExp is not considered to constrain implementation of the Action, as the 1st Meeting of the ComExp took place on March 3, 2017. Since then, the initial 3 members of the ComExp and the new member who replaced Dr. Ioannis Sagias were participating regularly in the implementation of various project Actions and were also informed on a permanent basis regarding the project progress and monitoring.

In conclusion, the expected outputs of the Action have been achieved. The establishment of the PSC and the ComExp have been concluded with no significant delays.

6.1.17 Action E2: Monitoring of the project progress

Foreseen start date: 01/10/2015

Actual start date: 01/10/2015

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Monitoring of the project progress was implemented smoothly and no major constraints have occurred. **Twelve (12) Meetings of the PSC and four (4) Joint Meetings of the PSC and the ComExp** were held during the reporting period (01/10/2015 – 30/06/2021), while **six (6) of the PSC's Meetings** were combined with the annual visits to the project by the LIFE EMT and one (1) project visit by the EC/EASME on May 14-15, 2018.

Regarding the PSC Meetings, the annual EMT visits to the project and the Joint Meetings of the PSC with the ComExp for the period January 2019 – June 2021, the following events were organised by the CoB:

- The 7th PSC Meeting and the 4th EMT/NEEMO Project Visit took place in Heraklion on the 13th of May 2019. The Minutes of the 7th PSC Meeting & the 4th EMT/NEEMO Project Visit was completed within June 2019.
- The 8th PSC Meeting and the 3rd Joint Meeting of PSC with the ComExp took place on February 18-19, 2020, in Heraklion.
- The 9th PSC Meeting took place online on May 27, 2020.
- The 10th PSC Meeting (combined with the 5th EMT/NEEMO project visit) took place virtually on September 29, 2020.
- The 11th PSC Meeting took place via teleconference on February 20, 2021.
- The 4th Joint Meeting of the PSC with the ComExp was organised also online on March 8, 2021.
- The last PSC Meeting (12th) along with the 6th annual project visit from EMT/NEEMO took place virtually on June 17, 2021.

In addition to the regular Meetings of the PSC, the project beneficiaries were in constant communication on a permanent basis. All the tasks and issues of the Actions under implementation were discussed between partners and all Beneficiaries were invited to express their views and assist in any way they could in planned and ongoing activities.

Action E2 was implemented successfully according to the established schedule.

6.1.18 Action E3: Compilation of information needed to complete the indicator tables based on LIFE multiannual work programme for 2014-2017

Foreseen start date: 01/10/2015

Actual start date: 01/10/2015

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action E3 started on time and a first report on a set of project indicators based on Section 7.1 of the LIFE multiannual work programme for 2014-2017 was delivered with the 1st Progress Report in October 2016.

In April 2016, the indicators applied to the project proposal were updated in accordance with the new filling forms on the online data collection tool of the EC for LIFE.

The project indicators were updated with the collaboration of the LIFE External Monitoring Team (EMT) during the period February 8-9, 2018. All indicators were inserted to the LIFE Key Project-level Indicators (KPI) database by the EMT; the first validation of KPIs provided by LIFE beneficiaries were sent by EC / EASME on October 29, 2018 [Ares(2018)5527582-29/10/2018].

At the beginning of the Project discussions between partners on the enrichment of indicators have resulted in no modification at this time. Although there were currently measurable data, the qualitative analysis of the results of Preparatory Action A1 and the Surveys in the framework of Action C1 has shown that "public opinion" is heavily influenced by policies followed and by systemic dysfunctions that require reforms, factors that did not actually changed during project's implementation.

Nevertheless, although the project had set high quantitative targets from the beginning which were not achieved finally for all actions, overall its returns seem to exceed the expectations of the Beneficiaries.

Regarding the programme indicators (after the end of the project) based on Section 7.1 of the LIFE Multiannual Work Programme for 2014-2017, it is believed that some of the project's indicators can be used, especially those that are related to specific actions that are proposed to be continued during the After-LIFE period.

Tis Action concluded on time with no obstacles or constraints.

6.1.19 Action E4: Auditing of the project's financial report by an independent body

1st Foreseen start date: 01/10/2017

1st Actual start date: 01/10/2017

1st Foreseen end date: 31/12/2017

1st Actual end date: 31/12/2017

2nd Foreseen start date: 01/04/2021

2nd Anticipated start date: 01/04/2021

2nd Foreseen end date: 30/06/2021

2nd Anticipated end date: 30/06/2021

Action E4 was set to be implemented in two phases, according to the project's timetable. Within the 4th trimester of 2017 and according to the in force (at that time) Common Provisions of LIFE projects, the Coordinating Beneficiary (UoC) had to inform about the External Auditors of the project, while within the 2nd trimester of 2021, the auditing of the project should have been taken place, with a provisional completion date of the Action within 3 months after the official deadline of the project (i.e. until 30/09/2021).

With the letter with Ref. Number easme.b.3(2018)3793288 of 16/08/2018, UoC was informed that Article II.23.2 (d) – Certificate on the financial statements had been replaced. The specific amendment was activated from 14/09/2018. In this context there is no obligation for CoB or other AB of the project to provide the Final Audit Report.

In this sense, Action E4 was not implemented and funds devoted to this Action were not used at all by any project's beneficiary (UoC and/or ABs).

6.1.20 Action E5: After-LIFE plan

Foreseen start date: 01/04/2020

Actual start date: 01/04/2020

Foreseen end date: 30/06/2021

Actual end date: 30/06/2021

Action E5 started within the foreseen schedule during the 2nd trimester of 2020 and completed with the production of the After-LIFE plan in electronic format, in Greek and English during June 2021. In completing implementation of the LIFE Natura Themis project, all beneficiaries have committed to continue some of the Actions for five (5) more years, as explicitly stipulated by the LIFE programme funding regulations and the European Commission. The After-LIFE Plan covers the period July 2021 – June 2026. Both the main Actions and the communication activities that are chosen for continuation have deemed to be successful in terms of implementation of the LIFE Natura Themis project (October 2015 – June 2021), and also were proven to be effective in attaining the objectives they were carried out for. Continuing these activities is considered necessary, as they will amplify the impact and influence of results achieved by LIFE Natura Themis project, assist in further publicising and disseminating them and support the transfer of know-how and experience gained during project's implementation. Among other things, the "After-LIFE Plan" provides the continuation of operation of the two Environmental Law Observatories of East and West Crete, continuation of operation and monitoring of the LIFE THEMIS Smart Devices Application, plus a series of activities for the publicising, promoting and communicating its results and the further distribution of the project's specially produced information materials and deliverables.

For each of the Actions, provision (overall and by beneficiary) has been made for:

- the beneficiary or beneficiaries responsible for implementation;
- the time frame for implementing each action; and
- the estimation of necessary financial resources (bearing in mind each beneficiary's capabilities and any obstacles or difficulties potentially arising over the coming five years).

At the same time, a bilingual Communication Strategy Guidebook was produced for assisting other Regions of Greece, Management Bodies of NATURA 2000 areas, regional & local authorities, NGOs and interested groups to build up a successful communication campaign, based in the experience gained from LIFE Natura Themis project implementation.

The After-LIFE Plan is available in printed and electronic format in two languages (Greek and English). The electronic format is posted in the official website of the project (under the field of "Deliverables": <http://www.lifethemis.eu/el/content/After-LIFE%20Plan>).

6.2. Main Deviations, Problems and Corrective Actions Implemented

The LIFE Natura Themis project was implemented smoothly and no significant constraints have occurred except the break out of the COVID-19 pandemic. Some Actions started earlier than the scheduled timetable, while some minor delays in Actions A1 (*A review on current situation: An update on EU and national environmental legislation about NATURA 2000 in Greece and gathering and analysis of judicial review procedures statistical data in Crete*), A2 (*Communication Strategy*), C1 (*Evaluation of the project effectiveness*), D1 (*Notice Boards*) and E1 (*Project Management*) did not pose any risks in the project's progress and outcomes. All beneficiaries collaborated continuously and any issues that have arisen have been resolved promptly and in the best possible way.

Specifically and in detail for each action:

- **Action A1** was implemented according to the foreseen time schedule, with a 3-month extension for additional collection and update of data. In the first year of implementation, the tasks of Action A1 exceeded those described in the proposal: not only a long-scale clearing has taken place, but it was the first time ever the Judicial Authorities of Crete faced the challenge of statistical analysis of their performance. The AB Coordinators had first to convince the stakeholders about the reasoning, the target and the need of the project, in order to continue later with the research itself. The 3-month extension in the duration of Action A1 benefited the implementation of Actions B1 and B2 (ELOs of East and West Crete, respectively), as well as the development of the Communication Strategy Plan (see also Action A2). Progress was achieved regarding the judicial research, the accuracy of the provided data and the uniformity of the extracted results. The 3-month prolongation of Action A1 did not affect in any way the financial provisions of the project's budget.
- **Action A2** was implemented according to the foreseen schedule, with a 3-month extension, as the action was strongly related and dependent on the implementation of Actions A1 and C1. The proposed Communication Strategy was developed in collaboration with all partners and in a way to be updated and modified according to the development of the project. It suggested a small modification in Action B3 (*Awareness Raising Activities: Workshops, Conferences and Smart Devices Application*).
- **Action B3** was scheduled to start during the 4th trimester of year 2016; however, the responsible beneficiary (HSPN) initiated the sub-action of the Smart Devices Application earlier in March 2016. Action B3 is implemented according to the established schedule and no major delays have occurred. A small modification of the planned activities was proposed (see also the Mid-term Report in the description of Action B3), concerning the organisation of 24 workshops for target audiences. No financial, technical or legal effects arose from the proposed and accepted changes of the sub-action and the sub-action completed on time. All activities were successfully concluded and their outcomes considered positive. A serious delay in the completion of the International conference proceedings (one of the 3 Deliverables of the Action) did not really affect project's progress. The Book of Proceedings of the International Conference on "International Perspectives on Preventing Wildlife Crime", Athens, 23-25 November 2018, was published in 750 copies at the early January 2020 and more than 500 copies have been already distributed by all partners.
- **Action B5** is the only Action that has not been completed properly. Eight (8) out of the nine (9) foreseen Training Seminars were successfully organized while the last Training Seminar addressed to Judges and State Prosecutors in Athens has never been concluded. After a series of postponements due to the evolution of the COVID-19 pandemic in Greece, the restrictions about traveling and the shortcoming of YPEN-COIEL to organize an online seminar due to lack of technical equipment and experienced technical staff to support such an event the 9th Training Seminar of the project did not take place in the end.
- **Action C1** started on time according to the project schedule and concluded with a 3-month delay. The problems encountered during the implementation of the research were primarily related to the sample size and the response to the invitation to participate in the baseline survey with questionnaires. The CoB recommended the continuation of the survey for two (2) more months for the collection and analysis of an additional number of questionnaires, in order to achieve 95% of the sample requested. The final sample reached 97% of the required and is considered indicative and safe to draw proper conclusions from. The delay affected the timely development of the Communication Strategy (Action A2), but it did not

influence the implementation of the related Actions (Actions of Categories B and D). No extra financial costs have arisen. The Action completed as foreseen with the conduct of the 2nd evaluation survey which carried out in 2019 and the completion of Action's Deliverable in January 2020.

- **Action C2 started and concluded within the initial time frame.** Although the 1st part of the survey did not face any constraints, the second part encountered some obstacles during its conduct due to Covid-19 pandemic which disrupted the conduct of scheduled interviews and prevented widespread participation in them. The completion of the questionnaires also fluctuated at very low levels for the same reason, as tourism professionals severely affected by the effects of the pandemic, did not have the luxury of dealing with them during that period. Even so, Action C2 conclusions are important for the project and will be used during the After-LIFE period in order to improve project's impact to the local society and to local and national environmental policy.
- **Action D1** faced a minor delay of 4 months that has occurred due to bureaucratic reasons and also significant changes to the Financial Management Regulations of the UoC. This 4-month delay in the completion of the Action did not really affect the major outcomes of the project as we consider that the relevant indicators of the Action have been already exceeded the foreseen of the initial proposal (5,000 people to be informed during the project's implementation period).
- Although the **Action E1** started on time, a 9-month delay noticed in the establishment of the Committee of Experts (ComExp), the composition of which was finalised in early January 2017 instead of the foreseen milestone (March 2016). This delay was not considered to set constraints in the implementation of the action, since the 1st Joint Meeting of the PSC with the ComExp (see also Action E2) took place on March 3, 2017 (milestone 03/2017). Since then, the 3 members of the ComExp participated regularly at the implementation of specific project's actions till mid July 2020, when one of the members of the ComExp (Ioannis Sagias) passed away. CoB took care to proceed immediately with the replacement of the deceased. The new member was directly appointed and informed about project's implementation, received copies of all project's material (printed and/or electronic) and participated to the last (4th) Joint Meeting of the PSC with the ComExp that took place online on March 8, 2021 (please see also Action E2).

Regarding the fulfilment of the YPEN-COIEL's obligations in Actions under the LIFE Nature Themis project, some changes occurred during 2019, which affected their proper implementation: The administrative structure of YPEN was modified and as an effect, delay was noted regarding (administrative) procedures. Delay for the completion of the public tenders in order to organise the Training Seminars (Action B5) was also denoted. Obstacles linked to the lack of flexibility were identified, but finally these obstacles were successfully overcome with the collaboration of the Secretary General for Natural Environment and Water of YPEN and six (6) out of the seven (7) seminars which were charged to YPEN-COIEL were completed.

Regarding other obstacles that were emerged upon the organisation of the awareness and education events: During the implementation of the project workshops, i.e. for the lay public and Investigating Agents (Action B3), low participation of specific groups of stakeholders has been observed. In order to improve the communication and participation of these groups, the possibility of holding additional workshops and meetings within 2020 was discussed among the project beneficiaries but the restricted measures because of the health crisis of COVID-19 overturned these plans.

The LIFE Natura Themis project's team faced significant obstacles in completing the last awareness and training activities of the project, i.e. three (3) workshops of Action B3, one (1) Training Seminar addressed to prosecutors/judges of Action B5, and the Final National Conference of the project (Action B3), due to mitigation measures for the Covid-19 pandemic. The project team proceeded with the online organization of these events (except the last Training Seminar which had never been organized). The last Press Conference of the project (Action B4) took place via teleconference too, on March 29, 2021.

Most of the participants of the workshops for Investigating Agents pointed out the complexity of the legislation and the consequent incorrect or incomplete drafting of the case files and expressed the wish for specific manuals with specific legal guidelines. The Coordinating Beneficiary (UoC) decided to produce a printed Technical Manual to address this issue, taking into consideration the time-line of the LIFE Natura Themis project. The Technical Guide was published in November 2020 and reprinted in February 2021 under the Action D5 and almost all its copies have been distributed.

The management of the LIFE Natura Themis project has been significantly regressed during March-May 2020 and November-April 2021, due to measures and restrictions for the inhibition of COVID-19 in Greece (and all around Europe). Access to Court records has been limited that period due to restrictions in presence in secretary court offices, therefore the collection of data from court files that was conducted manually with physical presence slowed down; however, data analysis continued smoothly.

6.3. Evaluation of Project Implementation

In general, the chosen methodology for the implementation of the project could be evaluated as successful. The Preparatory Actions (A1 and A2) and Action C1 (*Evaluation of the project effectiveness*) were planned in a way to ensure smooth implementation of all Core Actions. Despite the minor delays and dysfunctions caused due to bureaucracy and systemic weaknesses of the State and competent authorities, all aforementioned Actions were implemented successfully.

Any burdens and constraints that have arisen in the implementation of Actions B1 and B2 (ELO of East and West Crete, respectively) were resolved directly with the cooperation and involvement of all Beneficiaries. The work already done by the 2 ELOs is highlighted by the effectiveness indicators as described in the respective Actions. The methodology applied was generally effective. The personal contact between the Coordinators of ABs (i.e. CB, HB, HSPN and YPEN-COIEL) and the judicial and administrative clerks opened the LIFE Natura Themis project to the local and national community. Relations were built upon trust and cooperation. The only failure in the applied methodology was the poor feedback of some administrative clerks in supplying data to the ELOs. The outputs of Actions A1, B1 and B2 (data for the environmental crime and the implementation of the ELD in the Crete were extracted for the first time in the country) supplied with valuable material the Conferences and workshops of the Action B3, the Training Seminars of the Action B5, the documented production of the Technical Guides of the Action B6, the work done with the Media through the Action B4 and all the activities of the D Category Actions, leading to the organization of a high level of events as well as to the production of high quality information material.

The awareness and educational activities supported the general aim of the project and can be described as successful. Feedback for all the events was positive, as people from all over Greece have requested either information for the presentations or the materials of the

conferences and workshops (Action B3) as well as of the Training Seminars (Action B5) or asked for further contact with the LIFE Natura Themis project.

Action B4 (*Local media as a tool towards awareness raising and educating*) gave more than satisfying results. Beneficiaries maintain an active network of communication with local and national media, which has helped to further promotion of the project and is reflected in the outcomes of this action. The Radio and TV Spots were circulated all over the island and the country, receiving positive feedback on the quality of production and the transmission of the message. There were also international projections that added to the value of the project.

The objectives of the dissemination actions of the D Category are overachieved and no drawbacks were noted. Project's website is in full operation and will be active and updated during the forthcoming After-LIFE period; the Notice boards were erected in key accessible points and they will remain at least till the middle of year 2026; the Layman's Report has been produced and is distributed regularly with a plan of a wider dissemination in the near future; a robust Replication Plan has been produced and will be disseminated all over Europe, while the project's major outcomes and deliverables were well promoted and disseminated to a wide audience inside and outside of Greece.

The Communication and Dissemination Actions of the project (namely D1 – *Notice Boards*, D2 – *Project Website*, D4 – *Networking with other LIFE and non-LIFE projects*, and D5 – *Dissemination of the project and its results*) assisted the achievement of the project's objectives. The feedback from the D Actions is positive too. Especially the extensive network of people who came into contact with the project through networking activities recognized and appreciated on various occasions the value of the project and importance of its results. At the same time the outcomes of the conducted activities related to Action D5 show an increase of the project's impact on public awareness and sensitization which is also highlighted to the Deliverable of the Action C1.

6.4. Analysis of Benefits

6.4.1 Environmental Benefits

The Indicators' Tables submitted with the current **Final Report** reflect the final achievements of the project.

Although the project LIFE Natura Themis actions could not have any direct impact to any environmental good (biodiversity, species, habitat, water, soil, air etc.) all its actions had influenced, one way or another, citizens' and authorities behaviours and attitudes towards the improvement of environmental situation in Crete.

Regarding information about the reduction of environmental crime in Crete, formal or informal information was provided at all stages of project progress and through various channels (direct complaints in ELOs, HSPN and UoC offices, personal reports in workshops and events, e-mail messages in project's e-mail address, messages in project's website or Facebook page and use of the App). The project intervened, where possible, informally by giving legal advices or solutions or by exerting pressure to authorities/services for all cases except for the case of Application reports. In this last Action the administrator of the App forwarded to the competent authorities 167 complaints from which the issue was resolved in only 24 cases and the environmental degradation was restored/remedied. Of the unresolved cases, some are still ongoing and are expected to be resolved during the After-LIFE period.

It is obvious that even with these few cases of environmental damage remediation an environmental benefit is recorded.

Regarding the evolution of the environmental crimes prosecution during the project, the cases prosecuted from 2015 to 2019 have been sufficiently increased, especially during 2018 and 2019 as can be seen in ELOs final reports (Deliverables of Action B1 and Action B2). In this case, however, a clear indication of environmental benefit cannot be assessed in a safe way as for the same period the corresponding criminal prosecution and, consequently, a corresponding environmental remediation, have decreased. This image can be attributed mainly to the changes in environmental legislation in recent years, as analysed below in paragraph “**6.4.7 Policy Implications**”, and the economic and development orientation of the state.

However, the improvement of the effectiveness of the environmental prosecution (and consequently the environmental benefit), in the last two years (2019-2021) can safely be attributed to the contribution of the project through the organization of the conferences, the workshops and other events and the distribution of the specialized Technical Guides to the public officers and the investigating agents of all the authorities of the island.

The environmental benefits resulting from the implementation of the project are expected to be extended during the After-LIFE period.

6.4.2 Economic Benefits

At this stage of the LIFE Natura Themis project, it is quite difficult to quantify economic benefits, e.g. cost savings and/or business opportunities with new technology etc., regional development, cost reductions or revenues in other sectors. The LIFE Natura Themis project is a LIFE GIE project, so the possible economic benefits can hardly be quantified.

In any case, preventing environmental crime reduces the authorities’ burden to chase crime and thus saves public money. It also reduces the loss of habitats and species, which are important for their indirect or direct ecosystem services.

As far as the personnel of the LIFE Natura Themis project is concerned (with no calculation of the public servants that have devoted hours for the project’s implementation, either as non-additional or additional personnel) and regarding the number of **full-time equivalent (FTE) jobs created** for the period 01/10/2015 – 30/06/2021 (taking into account a 40-hours working time per week to be equal to 1 FTE, while the annual productive hours to be 1,720 hours) is **24.80 FTEs**. The **breakdown in qualified/non-qualified staff** is: 8.62 FTEs for non-qualified staff and 16.18 FTEs for qualified staff, meaning that the percentage of FTEs is 65.24% for the qualified staff and 34.76% for the non-qualified staff.

A kind of economic benefit of the project can be defined through the operation of the Smart Devices Application, in the sense of reducing time and money spent by citizens to report an environmental crime and by authorities to check the validity of the complaints initially and to perform autopsies if necessary at a later stage.

Additionally, the added value of the original research of the project, the surveys of the ELOs and their results (Actions A1 and B1-B2) will definitely save money from the state if it decides to document specific policies to tackle environmental crime.

6.4.3 Social Benefits

Apart from the personnel of the LIFE Natura Themis project that was involved in the implementation of the project’s Actions in a part- or full-time service contract, job opportunities for qualified staff have been created within Actions B1 and B2 (*ELO of East and West Crete, respectively*). Three young lawyers, specialized in Environmental Law, were cooperated on a voluntary basis with the ELO of West and East Crete, respectively. Personal

visits to the Courts, preparation of seminars and scientific involvement in lectures had been undertaken by a number of specialized personnel.

On the other hand, the Chania Bar Association created for first time a special Environmental Committee which consists of five (5) lawyers interested in environmental issues, while in the already existing Environmental Committee of the Heraklion Bar Association other members of the Association became involved.

All these activities will positively empower young legal professionals to direct their interest in environmental topics and in environmental legislation respectively.

It is also important to highlight that public services, lawyers, judges, journalists, academics and NGOs and even individuals are often contacting with the Environmental Law Observatories in order to report cases or ask for information regarding Environmental Law. The independent operation of the ELOs along with the dialogue opened with the locals through the local media, constantly and effectively filled in an existing gap in public participation and information.

The operation of the Application gave the opportunity to the public to be involved in a more active way. It is interesting to mention that mainly in remote areas of the island, for the same environmental problem there were more than 3 complaints from different users. Or the same user on the same day made 2-4 different complaints about different problem points. This confirms the significant impact that the project has had on local communities by helping citizens understand the scale of the problem, react and become more active.

The impact of the LIFE Natura Themis in the society can be also confirmed by the number of complaints or report of environmental crimes committed around the island or in other areas of the country and were notified in the project through its e-mail address or with a message in the Facebook page or by phone directly to ELOs', to UoC and HSPN offices. People from several islands, namely Paros, Spetses, Andros, Ikaria, Kalymnos, Corfu and Lefkada, as well as from areas of Tanagra (Regional Unity of Viotia), Livadia Thessalonikis and elsewhere contacted the project for clarifying if they can use the App in their areas, or for legal and/or administrative advices for dealing with an environmental degradation incident in their areas.

UoC continues the implementation of Actions regarding the illegal use of poisoned baits through the implementation of an After-LIFE project (i.e. After-LIFE Actions for the LIFE09 NAT/ES/000533 – LIFE IAP project), which cooperates continuously with LIFE Natura Themis project. Since the illegal use of poisoned baits is considered a major threat to biodiversity and human health – and since this practice is a major wildlife crime – the LIFE Natura Themis has provided information to several stakeholders about the legal procedure on the issue. This cooperation is considered to reduce the illegal use of poisoned baits with positive results for both the biodiversity and human health.

Continuous contacts of the project with local authorities and services of Crete, empowered the cooperation between Cretan beneficiaries and public officers, giving a promise of closer future synergies in the protection of island's nature and environmental crimes' reduction.

6.4.4 Replicability, Transferability, Cooperation

During the implementation of Actions A1 and B1-B2, ABs had the opportunity to meet officers in the competent authorities of all levels of the Administration. Specific cases of these contacts had highlighted serious efforts and smart solutions to tackle environmental crime, enriching the knowledge of the project team and assisting us to disseminate and transfer the experience gained to other authorities and administrative officers.

The Conservation Assistant of BirdLife Malta found the project's website and contacted the HB Coordinator for further information. The methodology implemented was sent in form of the 1st year's Report of Action A1. For the same purpose the Coordinator of the HSPN sent

BirdLife Malta more details about the technical and operational issues of the Smart Devices Application (Action B3). More cooperation is expected in due time.

The potential replication of the Application has been discussed also with the projects LIFE EcoLex- LIFE16 GIE/SI/000728 and LIFE PROWHiBIT-LIFE18 GIE/GR/000899 while the University of the Aegean expressed interest in developing a similar Smart Device Application and setting up an Environmental Law Observatory, for inclusion in a funding submission to the Internal Security Fund call for proposals 2020.

In addition, the targeted dissemination of the project has worked as a catalyst in the activation of other Bar Associations throughout the country and abroad. Some of them are already oriented towards adopting the function of an environmental observatory in the framework of their activity. For example the Bar Association of Thessaloniki, which has been twinned with CB during the reporting period, has expressed great interest for a relevant ELO in Thessaloniki. It is worth to mention that Thessaloniki faces significant environmental problems regarding heavy industrialization of the area.

It is also important to mention that the School of Journalism & Mass Communications of the Aristotle University of Thessaloniki invited the ELO of West Crete to co-organize the 7th Summer School of Environmental Journalism and to provide lectures to its students.

Also, HB and CB had collaborations and work on a permanent basis with the Bar Associations of other regions of Greece that will make this project transferable to other parts of the country. For example the Bar Association of Piraeus forwarded the survey of Action B6 (Survey for the Technical Guides) to all its members, since it has considered this Action and the whole project as of a great impact to all legal professionals.

The Technical Guides that were produced under Actions B6 and D5 have been delivered not only in Crete, but also in the whole country, so the Action is considered to have multiplying project's impact on all targeted audiences.

Through networking and awareness activities, interest about the LIFE Natura Themis project, its goals and aims, as well as the methods used for the implementation of specific Actions (e.g. the application for smart devices, the awareness raising campaign, the ELOs, etc.) emerged from other LIFE projects and NGOs operating in other countries (e.g. LIFE EcoLex Slovenia, WWF Bulgaria, WWF Germany, NGO Thalassa, LIFE PROWHiBIT, University of Aegean, the North Aegean Region, etc.).

Particularly and in regards to networking actions, one milestone in project implementation was our collaboration with the European Network of Prosecutors for the Environment (ENPE) and the LIFE ENPE project that was implemented by ENPE (LIFE14 GIE/UK/000043). This collaboration proved decisive in broadening contacts and familiarising the European and international legal and environmental world with the LIFE Natura Themis project and environmental law affairs in Greece.

Participation of LIFE Natura Themis project partners in a series of conferences and workshops held as part of the aforementioned programme (LIFE ENPE), getting to know leading Environmental Law practitioners from Europe, China, Australia, Brazil and other areas of the globe, and exchanging experience and knowhow on environmental law implementation in different countries enriched the working group's knowledge and added to the effectiveness of LIFE Natura Themis actions. At the same time, it lent impetus to further networking actions and contact with other projects or international forums and networks, such as the European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL), the International Network for Environmental Compliance and Enforcement (INECE), the European Union Agency for Criminal Justice Cooperation (EUROJUST), the

Academy of European Law (ERA), the International Union for the Conservation of Nature (IUCN) and the INTERPOL Wildlife Crime Working Group.

On the other hand, these networking actions promoted LIFE Natura Themis and its innovative activities more widely. The LIFE Natura Themis project is being considered as a project on its thematic that was carried out in Greece for the first time, highlighting issues of environmental law enforcement and the perpetration, detection, prosecution and legal response to environmental crimes in Greece. In addition, issues concerning the socioeconomic repercussions of environmental degradation in communities were emphasised further throughout the project's duration.

6.4.5 Best Practice Lessons

The feedback that was provided from competent authorities during the implementation of Action A1 was inadequate, slow and with several reservations. Only in a few cases, the authorities showed real interest to assist the LIFE Natura Themis project in data collection. In most cases, although the authorities considered the program as important, they expressed reservations about its feasibility. Apart from few exceptions, the authorities were not connected to Action A1 objectives and showed that the prosecution of environmental crime is of low priority in their duties. Experience showed that the method used by the CB Coordinator, to apply for and obtain an official authorization for direct access to criminal records as contracted researcher of the Life Natura Themis project, was effective. The authorities connected to the Action A1 objectives only when they were ordered to do so.

This situation has improved after the 2nd year of project's implementation as the frequent contact of the ELOs' Coordinators with the authorities/services helped to develop personal relationships and understanding of the object of the project as well as its importance.

The greatest burden was the lack of written complaints on environmental crime. Many officers received verbal reports of various crimes committed repeatedly in their competence areas, but either the claimants did not name the offenders, or they did not want to proceed in opening the prosecution process. The authorities failed to undertake ex officio prosecution acts in these cases. This situation also seems to have improved during the project's implementation period, with the operation of the Application for Smart Devices. Even the complaints were anonymous, were written and were accompanied by evidences such as geolocation and photos of the "green crime". A fact that helped them to carry out inspections, to identify the perpetrator in 1 case, to proceed with the prosecution of 1 person and to remedy the environmental damage in 24 cases.

6.4.6 Innovation and Demonstration Value

The cooperation between legal professionals, judges and NGOs in Greece is a very innovative action. Along with this, the project's partnership is also innovative, since we have managed to have on board two (2) Bar Associations (CB and HB) and a national level NGO (HSPN). The Bar Associations of Crete have never before involved in the implementation of any national or European project. The multiplying effect of this collaboration will be a great asset during the project's duration as well as for the After-LIFE communication plan.

With regard to the ELOs' operation (Actions B1 and B2), they are the only structures in Greece at the moment which monitor, record and analyse environmental crime (in Crete). The innovation in this Action is that, by localizing the research in the implementation of environmental law, the project created relevant data for the first time. These data is the starting point for addressing environmental crime in the country. Added to existing EU data and with the cooperation of the existing European institutions such as the Academy of European Law or the European Union Action to Fight Environmental Crime, they will

contribute to an efficient transfer of know-how and experience throughout EU members which face similar environmental problems.

Other innovative actions are the operation of the Geo-information Map of the environmental crime in Crete (Actions A1, B1, B2 and D2) and the operation of the Smart Devices Application (Action B3). The available GIS maps created during the implementation of Actions A1, B1, B2 and D2 are an innovation at the national level too. For the first time a tool like that is available for authorities and citizens. They also work in a wider context than originally targeted. Local journalists used them for writing relevant articles and public authorities already use them to target the “hotspots” of criminal activity and environmental degradation in Crete. This will enable them to direct the regional strategies against environmental offences and affect law and environmental governance.

The operation of the Smart Devices Application (sub-action B3) is also an innovative tool in the Greek reality, which increased environmental damage and/or crime reporting, while established a relevant database. Its pilot operation in the framework of the LIFE Natura Themis is evaluated as successful, and it will be a useful and efficient tool for Administration and the competent authorities in Greece and other countries of the EU as presented in the Replication Plan of the Action D4.

6.4.7 Policy Implications

During the **1st Joint Meeting of the PSC and the ComExp** (see also Action E2), three (3) representatives of the Ministry of Justice, Transparency and Human Rights (MJTHR), attended the debate, were informed of matters within their competence and received a Memorandum compiled by the PSC in order to facilitate project activities. The Memorandum included proposals for specific actions on behalf of the MJTHR, in order to help the 2 Environmental Law Observatories to conduct their work in an easier and more efficient way. This document was well accepted by the representatives of the Ministry and further actions on this issue are under way. The General Secretary of the MJTHR communicated with the UoC Coordinator and expressed his interest for the project and his will to sign a Memorandum of Understanding (MoU) between the MJTHR and the LIFE Natura Themis project, so that the Ministry provides assistance for several of the project Actions. With regards to the results of the LIFE Natura Themis project obtained up to this point, the Coordinator of the YPEN-COIEL communicated with the Ministry of Justice, Transparency and Human Rights (MJTHR), in order to establish cooperation. The MJTHR was still positive for cooperation with the LIFE Natura Themis project, but government’s priorities during that period of time were being concentrated in the pilot digitisation of the judicial archives of the Courts in the Regional Unities of Athens, Piraeus and Thessaloniki, and the creation of an environmental codification cannot be anticipated at the moment. The Government and consequently MJTHR’s superior authority changed during 2019. Contacts were made again with the new heads of services and efforts were made to communicate with the Minister himself but the Memorandum have never been signed by MJTHR.

Just from the beginning of the Project, the Coordinator of HB was invited to participate in the Special Standing Committee on the Protection of the Environment of the Greek Parliament on December 16, 2015, where he gave a speech upon a call for reforming the NATURA 2000 policy system. Seizing the opportunity he informed Committee’s member for the start of LIFE Natura Themis project and took the promise for a more analytical presentation of the project in a next meeting of the Committee. The invitation and the presentation of the project in the Special Standing Committee on the Protection of the Environment of the Greek Parliament took place during summer 2018. Coordinators of the UoC, CB, HSPN and YPEN-COIEL along with Mrs Kallia Antoniou, member of ComExp, participated at the Meeting / Session

on “Environmental Crime”, on July 11, 2018, where the presented the project, its preliminary results and conclusions reached so far as well as the potential use of project’s tools developed in the context of its implementation.

Contacts with competent local authorities in Crete continued throughout project’s implementation by all beneficiaries and two previous co-operations was proposed to be launched with the empowerment of the LIFE Natura Themis project, i.e. the possibility of the establishment of four (4) regional Environmental Police Units [the project proposed these Units to be consisted from police officers with the direct cooperation of a specialised state prosecutor in each one of the four (4) First Instance Courts of Crete], and the establishment, in a pilot basis and in local level, of an “environmental code” to be inserted in Courts of Crete during the registration of an environmental degradation case. Both proposals did not yield positive results so far but have been put on the table and rekindled the relevant discussions and fermentations after many years.

Among others the project made the following proposals to competent bodies and authorities:

- a) the creation of a spatial planning for the natural and cultural environment to delimit unauthorized- and excessive economic activity in the countryside and the corresponding sea areas;
- b) the institutionalizing of Environmental Prosecutors and Judges in each court of first instance; and
- c) the strengthening of the prosecution chain, by creating a national special body of environmental police.

All suitable means were employed to convey the international experiences thus acquired to government ministries, state agencies, local government organisations, monitoring and law enforcement authorities, education and research institutes, environmental conservation and management bodies, environmental NGOs, students and pupils on Crete, plus professional groups and local communities both on the island and in other regions in Greece.

The main means were talks and presentations by project group members at various events, articles written for the press and specialist scientific periodicals, reports and briefing letters sent to agencies and bodies, nationwide distribution of the project’s printed and electronic information material, personal contacts with state agencies, public authorities, bodies and foundations, whether targeted or making good use of various opportunities etc.

Some of the knowledge acquired, which we believe is worth promoting and adopting in Greece, too, is presented in the Replication Plan. This concerns actions, activities, planning and policies by European and international bodies and agencies in the fight to reduce environmental crimes and degradation.

At the same time, political decisions and changes in national legislation taken during the implementation of the project have led to a setback in the country's environmental law. Some of them directly opposed the goals of LIFE Natura Themis:

1. Article 8 of Law 4411/2016 provides amnesty for crimes involving imprisonment of up to two years. Judges are forced to apply the mentioned legal provision. Criminals remain *de lege* unpunished. The following crimes cannot be prosecuted (all of them have been recorded in our 2010-2015 research under Action A1): Poisoning (par. 1 art 8 of JMD 37338/1807/E.103/1-9-10); illegal logging (art. 268 of Law 86/1969); illegal grazing (par. 2, art 38 of Law 4055/2012); organized camps without a license (art 9 & 10 of Law 392/1976); illegal hunting; illegal hunting within protected areas; weapons transfer; hunting without permission; group hunting; hunting after the hunting season; hunting of protected species; exposure of dead animals to a common view (art 251, 256, 258, 259 of Law 86/1969 etc.).

2. The whole procedure of “fast track” licensing (Law 3894/2010) of private and business interests allows interventions at the expense of the NATURA 2000 protected areas. This licensing procedure bypasses all foreseen hearing, expropriation, land planning and regional development frameworks.
3. The new Forest Law (Law 4467/2017) drives NATURA 2000 protected areas to extinction, considering that almost 90% of the forest areas overlap with NATURA 2000 areas. The new law is issued in accordance to the aforementioned “fast track” Law and provides that land uses of forest areas logged or burned until 2007, may be changed for agricultural cultivation (art. 4 of Law 4467/2017). Warehouses, water facilities and electricity connections are allowed (art. 2 of Law 4467/2017). Acts of declaring a forest redeemable may be revoked (contrary to Article 117 of the Greek Constitution). The ban of legalizing land reclamation in protected areas, national parks, NATURA 2000 areas is lifted. The construction of industrial units is allowed inside forests. The establishment of processing plants for agricultural products, wineries, distilleries, beverages, bottling centres, oil mills and slaughterhouses is permitted (art. 3 of Law 4467/2017).
4. The regional land development plan of Crete serves exclusively private, non-regional interests breaching the principle of regional development. Thirty-three (33) wind parks are approved to double the energy production of the island (1,100 MW). All main and subprojects provided are located in NATURA 2000 protection areas. In addition, neither a nature and biodiversity spatial plan and a strategic impact assessment, nor special ecological assessments have been issued.
5. According to the monthly surveys carried out by the ABs Heraklion Bar Association and Chania Bar Association, more Laws that can be characterized as “environmentally harmful” have been added to Greek environmental law. In this context the partners discussed this issue with the members of ComExp in their last joint meeting (22/03/2018). They decided to send official information on the issue to all the ministries involved.
6. Project’s request for the creation of a new environmental crime code in the MJTHR did not have a positive outcome. Although the MJTHR was positive about the substantive aspect of the request, it denied the practical application of the measure at this time.
7. Historically, the Greek state does not plan on the basis of environmental data but on the basis of economic data. Local authorities (municipalities) can undertake to fill the gap of environment’s protection. They have the constitutional obligation to manage local affairs and Greek law provides them the regulatory tools for the protection of the local environment. The ELOs have already contacted most of the Municipalities of Crete, asking their environmental data for ELOs’ surveys.
8. The Criminal Code and Criminal Procedure were amended twice during the period June 2019 to November 2019. Laws 4619/2019 (Government Gazette A’ 95/11.06.2019) and 4637/2019 (Government Gazette A’ 180/18.11.2019) were adopted and changed a significant part of the Substantive Law and the procedural provisions. As far as the environmental crime is concerned, it is identified that the deregulation doctrine of the last decade is confirmed. The following provisions were annulled and withdrawn from the Greek Penal Code: a) Article 417 for penalising noise disturbance; b) Article 421 for punishing illegal activities in seashores and lakes; c) Article 423 for regulating the manufacturing and possession of poisons; d) Article 427 on cleanliness; and e) Article 428 on pollution. The abolishing of the last few environmental provisions in the Greek Penal Code inevitably leads to the consequent ineffectiveness of criminal repression. It is estimated that this way a chance for the codification of Environmental Crimes (even partly) has been lost. The need for such a codification has been repeatedly underlined by the LIFE Natura Themis project team. The partners of the LIFE Natura Themis project

have supported this need even in front of the Special Permanent Committee on Environmental Protection of the Hellenic Parliament (participation in meeting during 2020). However, the Hellenic Parliament judged that Environmental Crime Legislation calls for constant adjustments due to International and European legislation and thus no reference to the Greek Penal Code is necessary. This is against relevant research that has already been conducted in the framework of LIFE Natura Themis project.

9. Law 4512/2018 (Government Gazette A' 5/17.01.2018) has modified inspections including environmental inspections in order to harmonise national inspection services. This modification is appreciated that may result even to "softening" of environmental controls. Legislative *acquis* should not be deregulated and social accountability should be taken into account especially in this period. Instead, increased scrutiny and prosecution are required.
10. The LIFE Natura Themis project's team faced significant obstacles in recording environmental crime when the following Laws were passed and adopted: a) Law 4483/2017, which extended the operation of illegal installations within Natura protected areas; b) Law 3843/2010, which legalised illegal constructions; c) Law 4014/2011 & Law 4178/2013, which settled the posterior licensing of illegal works; and d) Law 4467/2017, which provided land use changes in forest areas. These laws overturned the previous administrative framework by infringing the administrative principles of "citizen's legitimate expectation" and "venire contra factum proprium".
11. A result of the confusion between the appropriate assessment procedure and the impact assessment study, at the level of administrative practice, is that in projects for which the national laws do not require the preparation of an Impact Assessment Study (e.g. off-plan building and/or arbitrary constructions, beach umbrellas and chairs on beaches), the procedure provided for in Article 6, paragraph 3 of the Habitats' Directive (Directive 92/43/EEC) is not followed, although it should be, when such projects involve Natura 2000 areas. This is of major importance, since according to LIFE Nature Themis' research in such categories (off-plan building and/or arbitrary constructions, beach umbrellas and chairs on beaches in NATURA 2000 areas), law violation is very often. This issue has been already communicated to the Ministry of Environment & Energy (YPEN) and we were informed that the European Union has also highlighted the specific gap and that YPEN is trying to cover it. At the same time, the aforementioned laws may be in breach with Directive 2004/35/EC on Environmental Liability and Directive 2008/99/EC for failure to take preventive measures for possible environmental damage. The recent changes to the Greek Penal Code may violate Article 83, section 2 of the Treaty on the Functioning of the EU, which obliges Member States to take all necessary measures in the field of criminal law. Since the entry of force of the Lisbon Treaty in 2009, the EU's competency to oblige Member States to take measures within the field of criminal law has an explicit legal basis in Article 83, section 2 of the Treaty on the Functioning of the EU. Member States shall provide effective proportionate and dissuasive measures according Directive 2008/99/EC.
12. In 2020, two (2) new laws were published, which raised great public awareness, since they may insult European *acquis Communautaire*: i) Law 4685/2020 regarding the modernization of environmental legislation; and ii) Law 4688/2020 regarding special forms of tourism and development. The Technical Chamber of Greece, the Greek Ombudsman, the Association of Administrative Judges, and a great number of environmental organizations have strongly criticized the aforementioned laws, while an Inter-Parliamentary Report has been addressed to the European Commission. According to Law 4685/2020 on "Modernization of environmental legislation, incorporation of Directives 2018/844 and 2019/692, etc.", industrial activities and units (mining, energy,

etc.) are allowed within sea and land areas of the NATURA 2000 Network, with the exception of zones of absolute nature protection. [It is mentioned, however, that road works are allowed even within the core of a protected area.] The provisions of Law 4685/2020 have already been challenged in a case of appeal to the Council of the State (CoS) for a wind energy project within a protected area of the NATURA 2000 Network on the island of Skyros (unpublished Decision of CoS No.1690/2020). According to this decision, the wind power units (111 wind turbines) degrade the ecosystem of the island and the specific protected area and therefore their environmental permitting should not be approved. With specific provisions of Law 4685/2020, the legislation that refers to forest mapping has been once more changed, which leads to consideration on how the target of the Forest Cadastre would be finally implemented. It should be noted that the existence of an updated Forest Cadaster is of great importance for the conservation of the forestry wealth of Greece. Furthermore and despite some positive provisions, Law 4685/2020 is generally considered insufficient for the protection, especially of marine areas, as it is inherently impossible to delineate the trans-zonal environmental effects, i.e. the effects of an activity that is typically located outside the core, but substantially affects the broader marine area. In land areas, extensive road projects, even within the core of the areas, contribute to land fragmentation and the consequent degradation of ecosystems. The new law (4685/2020) limits the time for drafting EIAs, delegates control to private evaluators, limits administrative, judicial and social control of planned projects, shrinks public and transfers important know-how and information to private databases. It is important to mention, that although this Law (4685/2020) has been initially published so that Greek Legislation would successfully comply with the obligation for setting conservation objectives and therefore confront the pending European Commission's action, the Hellenic Republic has failed to fulfil its obligations under Articles 4(4) and 6(1) of Directive 92/43/EEC and under the Treaty on the Functioning of the European Union by not adopting within the prescribed periods all the necessary measures for establishing appropriate conservation objectives and appropriate conservation measures in relation to the 239 Sites of Community Importance (SCIs), which are on Greek territory and are included in Commission Decision 2006/613/EC of 19 July 2006; CJEU in its case C-849/19 (the European Commission v Hellenic Republic) judged that the Hellenic Republic has infringed Articles 4(4) and 6(1) of Directive 92/43/EEC and the Treaty on the Functioning of the European Union. In this Decision, Law 4685/2020 was not examined at all, due to the fact that it has been regarded as issued overdue.

13. Provisions of Law 4688/2020 on “Special forms of tourism, tourist development, etc.” restricts the individual right to enjoy the environment and extends the right of commercial exploitation of the commons (seashore, beach, ports and seabed). The transfer of the management of much of the national wealth, which now contributes to public economy, to private entities and individuals may reduce the state's direct resources and probably may affect the public real estate, the national security and the civil protection.
14. The legislative changes in both aforementioned laws may affect both Directive 2004/35/EC on Environmental Liability and Directive 2008/99/EC on the Protection of Environment through Criminal Law, due to failure to take effective and proportionate preventive measures against possible environmental damage.

In order to somehow deal with this setback, the legal partners of the project intervened in the consultation of some laws or sent direct comments to the competent ministries. Both the HB Coordinator and a ComExp member using the experience gained from the project participated in the preparation of the report “Improving implementation and the evidence base for the ELD” which edited during 2020 by the EC.

7. Key Project-level Indicators

The set of project indicators based on section 7.1 of the LIFE multiannual work programme for 2014-2017 was delivered with the 1st Progress Report (1st PR, 27/10/2016).

In April 2016, the indicators applied to the project's proposal were updated in accordance with the new filling forms on the online data collection tool of EC for LIFE projects.

The initial compilation of Indicators' Tables reflects the overall progress of the program. Discussions between partners on the enrichment of indicators have resulted in no modification during project's implementation. The qualitative analysis of the results of Actions A1, C1 and C2 has shown that "public opinion" is heavily influenced by policies followed and by systemic dysfunctions that require reforms. These factors did not seem likely to change in the near future taking into account the current economic conditions, political priorities of the country and international development directions that affect Greece as well.

In any case, the monitoring of the indicators of the Actions but also of the Specific Indicators of the project show a relative improvement of the initial situation as reflected in the evaluation of 2017 (Mid-term Report) and the updated indicators' analysis in the **Final Report**, both quantitatively and qualitatively.

Monitoring of behavioural changes such as the increase of complaints about environmental crimes or reduction of delinquency, etc., would be risky if someone wanted to evaluate them in a quantitative manner. The increase of the complaints through the Application, the ELOs and the direct reports to ABs could be read in two ways: or as a real behavioral change by raising awareness and activation of citizens and services (which can be considered as a positive result of the project) or as an apparent behavioral change if we consider that citizens and services have benefited from the project and its actions in order to confirm their awareness and feel better with themselves (by making anonymous complaints) but not their dynamic participation in the object (assignment of activation to the project) which can be considered as a neutral impact.

The same can be said also for citizen's attitude changes, if we take in account their responses and feedback from the implementation of information activities (workshops, open events, lectures, TV and Radio Spots, articles and interviews in Mass Media etc.) and the operation of the website/Facebook page of the project. Thousands of people became aware about green crime but there was no spectacular reduction of it. Citizens continue to favor the economic and social improvement of their daily lives over the quality of life offered by a healthy and clean natural environment.

The above assumption does not contradict the purpose of the project. On the contrary it reaffirms its necessity. The project achieved to set the groundwork for the formation of the first representative prosecution indicators, change the readiness for cooperation between administrative bodies and promote effectiveness in developing a control mechanism for environmental protection and management.

If nothing else, the partners managed to make the project known at international level with positive feedback coming from both the academic legal and environmental community and the involved ministries and authorities, as well as from the public of the country.

8. Comments on the Financial Report

The Standard Statement of Expenditure (available in the LIFE reporting section on the LIFE website) has been used by the CoB (UoC) and all ABs (namely CB, HSPN, YPEN-COIEL and HB). Statements are presented in a separate document, as described in the guidelines on preparing the Financial Report and Annexes.

This part of the Technical Report includes the following:

- an overview of the costs incurred;
- information about the accounting system and relevant issues from the partnership agreements; and
- allocation of costs per action.

This information includes sufficient detail to establish a clear link between the technical activities on one hand and costs declared in the financial forms on the other. This section justifies and explains extraordinary cases, e.g. necessary costs not foreseen in the budget, persons changing status during the project from external consultants to employed staff (or vice versa), etc.

8.1. Summary of Costs Incurred

The total costs incurred during the reporting period of the Final Report (01/10/2015 – 30/06/2021) for the LIFE Natura Themis project cover a **percentage of 86.63%** of the total budget (1,368,892.74 € vs. 1,580,117.00 €). In the following **Table 8.1**, you may find the incurred project costs per category of expenses for the period 01/10/2015 – 30/06/2021:

TABLE 8.1: Total costs incurred for the whole reporting period (01/10/2015 – 30/06/2021) per cost category.

PROJECT COSTS INCURRED			
Cost category	Budget according to the Grant Agreement in €*	Costs incurred within the reporting period (01/10/2015–30/06/2021) in €	%**
1. Personnel	906,500.00	865,462.06	95.47%
2. Travel and subsistence	119,605.00	61,293.55	51.25%
3. External assistance	285,500.00	234,075.33	81.99%
4. Durables goods: total <u>non-depreciated</u> cost			
- <i>Infrastructure sub-tot.</i>	0.00	0.00	-
- <i>Equipment sub-tot.</i>	40,960.00	30,868.74	75.36%
- <i>Prototype sub-tot.</i>	0.00	0.00	-
5. Consumables	10,300.00	6,975.79	67.73%
6. Other costs	115,220.00	81,673.26	70.88%
7. Overheads	102,032.00	88,544.01	86.78%
TOTAL	1,580,117.00	1,368,892.74	86.63%

*) If the EASME has officially approved a budget modification through an amendment, indicate the breakdown of the revised budget. Otherwise this should be the budget in the original grant agreement.

***) Calculate the percentages by budget lines: e.g. the % of the budgeted personnel costs that were actually incurred.

The LIFE Natura Themis project has already received the 1st and 2nd Pre-financing Payments from EC/EASME, totalling to **70.00% of the EC contribution** to the project, i.e. the total amount of EC contribution received is **655.047.40 €** Since the percentage of costs incurred within the whole project duration is **86.63%**, a payment of the balance is expected from EC according to the validation of the eligibility of relevant expenses.

8.2. Accounting System

The financial administration of the LIFE14 GIE/GR/000026 – LIFE Natura Themis project was accepted by the Research Committee of the UoC under the specific Code Number 4364.

A stamp with the LIFE logo and the relevant Reference Number of the Grant Agreement was prepared and distributed to all project ABs.

All beneficiaries are using an accounting system and codes identifying the project costs in their overall system. All cost documentation is stamped with the project stamp, and, when possible the code and acronym of the project (i.e. LIFE14 GIE/GR/000026 – LIFE Natura Themis) are mentioned in invoices, contracts, receipts, travel documents, time-sheets etc. The Financial Department of each project beneficiary is responsible for checking that all appropriate documents and invoices are available and executes all relevant procedures for payments. The project's original financial documents are kept in dossiers according to the specific expense categories of LIFE projects, at the premises of each beneficiary.

The LIFE model time-sheets are used by all project beneficiaries; it is the responsibility of the beneficiaries' project coordinators that they are kept in a daily basis. All time-sheets are signed within the first 10 days of the following month and are kept in special dossiers per employee.