Administrative Law Briefing: Special Edition

Modernizing waste management in Greece: Highlighting changes in the legal framework

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A. Introduction

1. Law 4819/2021 [1] sets out the framework for waste management in Greece and includes provisions on the organization and operation of the Hellenic Recycling Agency and on the protection of the natural environment.
2. The percentage of separate collection of waste remains low in Greece, the objectives set by the European Union and by the national and regional planning for increasing recycling rates have not been achieved so far and critical financial resources are being lost.
3. Law 5151/2024 (the **New Law**) aims to modernize waste management in Greece by introducing changes to the waste management scheme set out in Law 4819/2021, while also aspiring to redress dysfunctions of the past.
4. Provisions have been introduced which:
   a. enable the Ministry of Environment and Energy to undertake initiatives to ensure proper

[1] Integrating EU Directives 2018/851 and 2018/852 into Greek National law.

waste management at a local level;

b. modify the collective deposit-return scheme in accordance with European best practices;
c. enable the National Producers' Register to interoperate with other registries; and
d. extend the possibility of marine transportation to all separately collected recyclable materials.

B. Initiatives of the Ministry of Environment and Energy: Enhancement of Recycling at a Local Level and Interventions in Emergency Situations

1. By way of the New Law, the Ministry of Environment and Energy can launch tender procedures for supplying all municipalities of the country with equipment for separate collection and transportation of biowaste and recyclable materials. It is also able to launch tender procedures for the provision of services for the implementation of separate collection and transportation of recyclable materials in mountainous and island municipalities with a permanent population of less than 10,000 inhabitants.
2. For this purpose, the Ministry concludes programme agreements with the Central Union of Municipalities of Greece (**KEDE**) as the representative of all municipalities, the Hellenic Recycling Agency (**EOAN**) and Solid Waste Management Operators (**FODSA**s).
3. The aim of the new provisions is to promote separate collection of waste in Greece by addressing equipment issues and issues related to the differentiated needs of each municipality.
4. The Minister of Environment and Energy can intervene in cases where the management of urban waste has caused or may cause an emergency situation with an immediate risk of environmental degradation or a threat to public health. If the required or sufficient measures are not taken by the competent local authorities for any reason, the Minister of Environment and Energy may assign the implementation of any required project or action to the Secretary General for Waste Management Coordination.
5. The Minister of Environment and Energy may also intervene in the same way in other cases of refusal, substantiated inability or lack of action by a municipality or a FODSA to adopt the necessary measures in the context of their legal competences and responsibilities.

C. The Single Collective Deposit-Return Scheme and Provisions on Empty Packaging of Plant Protection Products

1. As of 1 December 2025, the implementation of the deposit-return scheme for single-use plastic bottles and metal containers is to be carried out through a single nationwide Collective Deposit-Return Scheme of Alternative Waste Management (the **Collective Deposit-Return Scheme**), which is to be designed and organized by packaging producers. The alternative management of municipal packaging waste (plastic bottles and metal containers) is also

handled by the Collective Deposit-Return Scheme, but it will no longer apply to glass packaging.

2. Joint ministerial decisions of the Ministers of Development and of Environment and Energy will set quantitative objectives to be achieved through the Collective Deposit-Return Scheme upon the recommendation of EOAN. Other packaging waste to which the Collective Deposit-Return Scheme will be applied will be defined in the same way.
3. The new provisions have been brought in to reduce both the complexity of the system and the risk of consumer confusion. It is also expected that the Collective Deposit-Return Scheme will contribute to the achievement of national alternative waste management goals.
4. New provisions will be introduced by way of a joint ministerial decision issued by the Ministers of Environment and Energy and of Rural Development and Food to regulate and set quantitative objectives for more specific issues relating to alternative management of empty packaging of plant protection products. It is expected that measures aimed at the prevention of uncontrolled disposal of such products which may result in pollution of the soil, surface and groundwater and negative effects on human health will be defined.

D. Interoperability of the National Producers' Register with Other Registries

1. The interoperability of EOAN's National Producers' Register (NPR – EMPA) with other registries is introduced with a view to better monitoring waste management: a check is automatically carried out if a legal or natural person applies for registration of changes or data or the issuance of certificates or copies from the General Commercial Register (GEMI) to identify whether the person is registered in the EOAN's NPR – EMPA.
2. If the person is then found to be a producer who, contrary to legal obligations, has not signed a contract with an Alternative Management System for Packaging and Products Waste and is not registered with the NPR – EMPA, EOAN can impose administrative sanctions.
3. Food waste produced by certain entities, as well as donated food surpluses, must be registered annually on a special electronic platform, which interoperates with the electronic database for food of animal origin and animal products of the Ministry of Rural Development and Food. The deadline for these registrations coincides with the deadline for the registration of waste production in the Electronic Waste Register (HMA).
4. Sanctions are imposed on organizations and businesses which are liable to register data in the HMA and do not submit waste reports annually and fail to do so, with the aim of reducing the lack of data which makes it difficult to trace waste in Greece.

E. Maritime Transport of All Separately Collected Recyclable Materials

1. It was previously provided that when the need arose, maritime transport of waste streams falling under the provisions of Law 4819/2021 was permitted. However, not all recyclable

materials were covered by this provision.

2. Under the New Law, the loading, unloading and maritime transport of all separately collected recyclable materials is permitted, provided that the cargo is appropriately packaged.



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