

The Hague, 10 July 2014

**Mr Antonis Samaras**

Prime Minister of the Hellenic Republic  
340 Leoforos Syngrou  
17673 Athens, Greece

***Ref: Serious threats to the coastal landscapes in Greece by a proposed law currently under discussion by the Hellenic Parliament***

Dear Mr. Prime Minister,

I write to you on behalf of Europa Nostra, the pan-European federation of NGOs committed to the safeguard of Europe's cultural and natural heritage, which last year celebrated its 50<sup>th</sup> anniversary with a major Congress held in Athens (12-16 June 2013), under the auspices of H.E. the President of the Hellenic Republic, Dr. Karolos Papoulias. More recently, Europa Nostra has welcome and fully endorsed the historic conclusions adopted on 20 May by the EU Council of Ministers under the Hellenic Presidency of the EU, on "cultural heritage as a strategic resource of a sustainable Europe"<sup>1</sup>.

By the present letter, we wish to draw your personal attention to the draft law recently submitted to the Hellenic Parliament, under the title: "Boundary marking, management and protection of the coastline and shores". Europa Nostra and our Greek member organisations, led by Elliniki Etairia, our country representation in Greece, wish to convey to you and - through you - to the entire Greek government, our grave concern about some provisions of the proposed law which, if adopted and implemented, will put the invaluable coastline environment and heritage in Greece under serious threat.

Europa Nostra applauds every effort to achieve "smart, sustainable and inclusive" growth and development in Europe and more specifically in your country Greece, a European country whose people have undergone an unprecedented decline in living standards over the last four years. We however believe that economic development can be neither healthy nor sustainable in the absence of due safeguard and enhancement of our environment and our cultural heritage, a fact demonstrated so vividly by the disastrous boom-and-bust experience in Spain in the previous decade. This is even more true for Greece because the natural beauty and cultural wealth of the country are two of its principal and most valuable economic as well as environmental assets.

The failure of the Spanish development model as well as the environmental degradation of the Turkish coasts has given Greece an opportunity to avoid those errors by promoting and achieving true sustainable development, while simultaneously restoring its prosperity.

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<sup>1</sup> Council of the European Union Conclusions on cultural heritage as a strategic resource for a sustainable Europe, Brussels, 20 May 2014  
[http://www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/en/educ/142705.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/educ/142705.pdf)



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In the light of the above, we wish to express our particular concern in respect of the following provisions of the above-mentioned draft law:

- The possibility of legalisation by entrepreneurs of existing illegal constructions on the coastline and the shore.
- The abolition of all restrictions on the grant of the coastline for private commercial use.
- The exclusion from any protective measures of the banks of many large lakes and rivers, which constitute a precious ecological resource for its region.
- The evident neglect of a whole range of European and national legislation each of which insist on the protection of the coastal zone (eg Integrated Coastal Zone Management Protocol).
- The lack of reference to European regulations and national law for the protection of biodiversity and the safeguard of conservation areas.
- The encouragement of permanent constructions on the coastline by private individuals for entrepreneurial purposes.

The above provisions are the more surprising given it is now commonly accepted by climate scientists around the world that the sea level will rise over the next fifty years as a result of the gradual melting of the Antarctic ice cap, a process which is already under way and is unlikely to be reversed. This development represents a further strong argument in favour of protecting the immediate area of the coastline as free of construction as possible, thus avoiding the type of shortsighted development which destroyed alike Spain's coastal environment and national economy. This is one of the mistakes Greece did not make in the past; it will therefore be all the more deplorable if your government would chose to make them now.

We have also noted with serious concern the hasty passage on 24 June through the summer session of the Hellenic Parliament of a law which reduces the security which proper land use regulation provides both to investors and to purchasers of holiday homes. It will apparently now be possible for some land uses to be altered by simple Ministerial decision without a strategic Environmental Impact Assessment. We would respectfully point out that legal security both for an investor and for a purchaser are prime conditions of sustainable economic development; we therefore fear that this legislation will encourage speculative but discourage serious investors. We fully understand that Greece has the obligation to introduce a legal reform allowing existing procedures for permits to become more flexible than in the past. This however cannot be done to the detriment of Greece's obligation to comply with a wide range of relevant EU regulations, including the ones related to the protection of our natural environment (such as the Directive "Natura 2000").



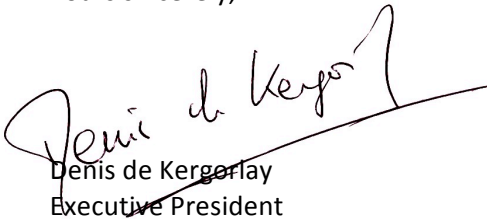
For all the reasons mentioned above, it is not surprising that many organisations and persons in Greece and beyond have already voiced their objection to this proposed legislation. At European level, Europa Nostra has written to José Manuel Barroso, President of the European Commission, drawing his personal attention to the draft law currently under consideration by the Hellenic Parliament. We have urged President Barroso and the entire European Commission to encourage the Greek government to promote a sustainable model of its economic and social development, including tourism, which cannot be done at the cost of the priceless cultural and natural heritage of your country. A copy of this letter is enclosed, for your complete information.

Your position as the Prime Minister of Greece, combined with the sensitivity to matters of cultural heritage you have shown in the course of your political life, among others during your mandate as Greek Minister of Culture, encourages us to approach you in the hope that even at this late stage you will intervene in order to introduce substantial amendments to the draft law, with particular emphasis to protecting the coastline, the Greek islands and the island communities, which will be worst affected by it. At a time when some important heritage sites, like the ancient port of Delos, are already at risk from the rising sea-level, it would seem inconceivable that any Greek government would put its coastline, and its people, at any greater risk than absolutely necessary.

We firmly believe that your possible intervention to alter the present draft law would represent a major benefit for Greece's economic, environmental and social development, and also yet another admirable illustration of your capacity for leadership as demonstrated in the past two years.

Thanking you in advance for the urgent attention which you would be prepared to give to our concerns and staying at your disposal for any additional consultation,

Yours sincerely,

  
Denis de Kergorlay  
Executive President

**Enclosure:**

Copy of the letter sent to José Manuel Barroso, President of the European Commission on 10 July 2014

