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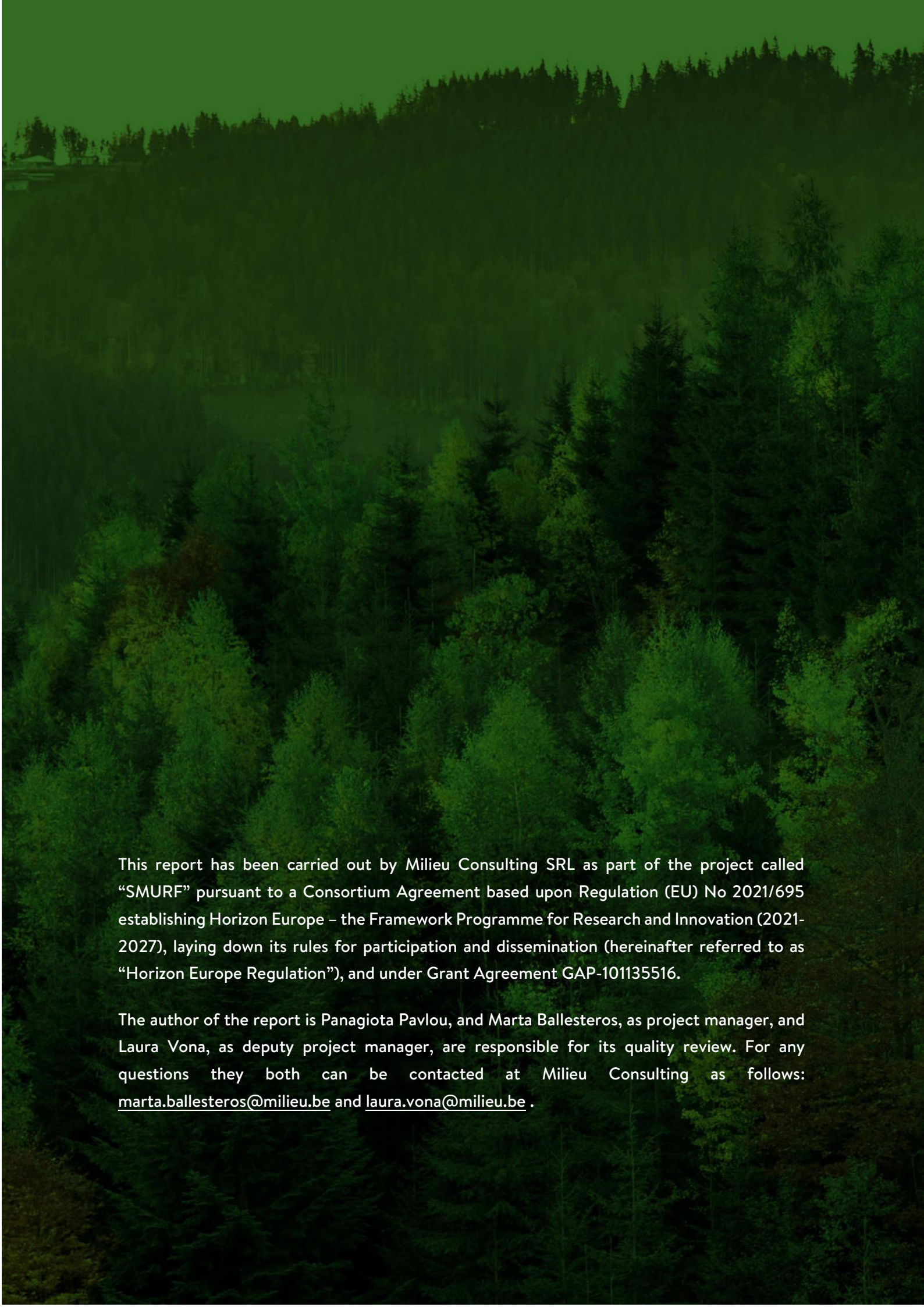
Legal and regulatory framework applicable to Small Forest Owners and Sustainable Forest Management

Country Fact Sheet
Greece

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THE FOREST OWNERS' PROJECT

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Table of Contents

Executive Summary 4
Introduction 6
1. Basic legal and regulatory framework applicable to small forest owners 8
1.1. Context to the legislation 8
1.2. Basic legal instruments 8
1.3. Basic Regulatory framework 10
2. Governance and institutional framework 12
2.1. Distribution of competences between the State and Regional authorities 12
2.2. Key representation organisations of the forest sector 16
3. Forest land ownership structure 18
3.1. Data on national forests ownership structure 18
3.2. Definitions of forest ownership in your country 19
3.3. Forest ownership types in your country 20
3.4. Proof of ownership: Land registry and Cadastre 21
4. Rights and obligations: forest owner/holder and forest contractor 23
4.1. Overview 23
4.2. Legal rights of the forest owner/holder 25
4.3. Limitations to the rights of forest owner/holder 27
4.4. Forest owner/holder obligations and requirements. 30
4.5. Forest manager/contractor obligations 33
5. Forest Management plans 34
6. Sustainable forest management. 39
6.1. Sustainable forest management definition and forestry practices 39
6.2. “Closer-to-nature” guidelines and practices 45
6.3. Climate change and Forest carbon absorption 47
7. Forest land market 48
8. Forest companies, Forest incentives and taxation. 50
Forest Companies 50
Forest incentives and taxation 51
9. Enforcement: Forest control and penalties. 53
10. Conclusions 55
10.1. Legal or regulatory barriers for SFM 55
10.2. Legal or regulatory gaps in national forest legislation 56
National experts on forest legislation and references 58

Legal and regulatory framework applicable to Small Forest Owners and Sustainable Forest Management (SMURF) - WP2

Executive Summary

The legal and regulatory framework for small forest owners in Greece integrates constitutional provisions, national laws and strategic policies aimed at protecting forest ecosystems and promoting sustainable management. Key legal instruments include Article 24 of the Greek Constitution, which prohibits changes in forest land use unless for public benefit and laws such as Law 998/1979, which emphasises environmental protection, biodiversity conservation and sustainable practices. Historical frameworks like the Royal Decree of 1836 define private forest ownership, while the Forest Code (Legislative Decree 86/1969) and Law 3208/2003 regulate forest management, resource use and protection.

Forest land ownership in Greece is predominantly public. Private forest ownership is limited, with individual holdings accounting for only 8% of the forest area and small holdings of 2-50 hectares comprising just 3.2% of total forest land. Ownership proof relies on legal documents and registration in the Hellenic Cadastre, which covers 85.7% of the territory as of 2022. The Cadastre recognises as private land only those areas previously acknowledged by the Forest Councils, with any land not recognised by the councils not classified as private. While there is no dedicated forest ownership registry, forest lands are included in the general property register. Registration is mandatory, with fees applied, but updates remain incomplete in rural and forested areas, complicating ownership clarity.

Under the current legal framework, forest owners are entitled to financial support for forest management, reforestation and conservation, funded through national and public investment budgets. They also benefit from potential tax exemptions and retain decision-making authority over forest management practices, adhering to sustainable and equitable principles. Harvesting is permitted within forestry management plans, while land use conversion and deforestation are generally restricted. Obligations include sustainable management, fire prevention, maintaining forest roads and adhering to environmental permits. Citizens have access to forests for recreational use and owners must allow third-party access for public interest purposes. Greek legislation does not explicitly guarantee the right to walk in forests, but access is generally allowed unless restricted for environmental or property reasons. While the Civil Code grants forest products to the landowner, such regulations are often not strictly enforced and visitors commonly collect them. Forest ownership is documented in the Hellenic Cadastre and land is subject to property taxation.

Sustainable Forest Management (SFM) in Greece is defined by the National Forest Strategy 2018-2038 as the sustainable use of forest ecosystems to conserve biodiversity, maintain vitality and ensure forests' ability to provide ecological, economic and social services for current and

future generations. Key objectives include biodiversity preservation, forest regeneration and the promotion of multifunctional Mediterranean forestry. Although specific legal obligations for forest owners and managers regarding restoration and conservation were not identified, legislation promotes reforestation and selective logging. The strategy also integrates climate change resilience and biodiversity conservation, with a focus on mitigating habitat fragmentation and maintaining ecosystem integrity.

In Greece, forest industries and contractors are not specifically registered, though forest management is addressed under the Hellenic Cadastre. Forest cooperatives, governed by Law 4423/2016, operate under specialised legislation, distinct from general company laws. Small forest owners can attain the status of forest companies. Incentives for forest management include honorary rewards for firefighting and EU-funded Rural Development Programmes for SFM. LIFE projects also support biodiversity conservation and forest protection. Taxation includes the ENFIA property tax and taxes on forestry income for both primary and secondary forestry products.

The forest land market in Greece is regulated by a legal framework emphasising conservation and sustainable use. Transactions involving forest land must adhere to constitutional protections (Article 24) and laws like the Forest Code (Legislative Decree 86/1969) and Law 998/1979, which restrict land use changes and require approvals for development. The Hellenic Cadastre and its National Forest Map Programme provide essential information on land classification and ownership. Limitations exist on dividing forest land, as prior authorisation from the Ministry of Agriculture is mandatory, while the State retains the right of preference for private forests exceeding 50 acres. Leasing and inheritance of forest land are minimally regulated, with interventions requiring stringent approvals. Financial credits for forestry activities are partially subsidised, though unclear land ownership complicates access to loans or mortgages.

Key recommendations include simplifying complex ownership and tenure laws by completing the national cadastre and streamlining regulations to reduce legal uncertainties. Explicitly incorporating closer-to-nature forestry principles into the National Forest Strategy and related laws is essential to provide clear guidance and promote ecosystem-based practices. Strengthening financial support for small forest owners, enhancing enforcement and monitoring mechanisms and developing structured incentives will encourage the adoption of sustainable forest management and biodiversity conservation practices across ownership types.

Introduction

This is a Horizon project with a strong research approach. The name of the project is 'Sustainable Management models and value chains for small Forests' known as SMURF with the reference HORIZON-CL6-2023-CIRCBIO-01.

The general objective is to provide an analysis of the legal and regulatory framework in EU Member States applicable to small forest owners (SFO) in their practices aiming to Sustainable Forest Management.

The specific project objectives are:

1. Prepare a report on the legal framework on SFO for most EU Member State.
2. Identify the basic legislation regulating SFO and the specific articles setting rights and obligations and *provide the links* to those basic and articles.
3. Define the rights and obligations for SFO in EU Member States.
4. Define the legal framework for the economic activity of SFO in EU Member States.
5. Identify the **main legal limitations or barriers** for SFO in EU Member States.
6. Identify **needs for legal reforms and propose specific legal improvements**, when considered necessary.
7. Prepare a comparative analysis of the legal framework SFO in the EU Member States.

These guidelines provide the basic information for the elaboration of the report on legal framework applicable to Small Forest owners/holders. It is complemented by a pilot report showing as a model to show the level of depth of the analysis.

When using the term "legal framework" we consider:

- The organizational model of forestry and the forest value chain.
- The institutional framework, identifying the distribution of competences among the different administration levels (European, national, regional and local) and administration sectors (agriculture and rural development, environment, industry, interior, economics and others).
- The regulatory framework, identifying laws and regulations that affect forestry and the forest value chain. The key articles that set basic rules for forestry will be explicitly referred and translated into English.

The analysis will be focused on factors that affect the participation of forest holdings in the market. There is a particular interest in identifying barriers, obstacles and measures or instruments that have had a significant positive impact in the present functioning of the forest markets.

The analysis will describe the nowadays situation of the framework, although a contextual and short reference of the origin and evolution of the framework when needed for a good understanding will be included.

The analysis will consider the national legislation and will only refer to the regional legislation as a way of example to confirm the national legal framework or to show that in some regions the situation may be rather different.

The analysis will take into consideration the forest sector legislation, but not only, because the main barriers and legal limitations might be derived from the inadequacy of other sectoral laws (societal, fiscal, real state and ownership, cadastral, insurances) or requirements in some pieces of national environmental legislation. It will refer to Nature or Biodiversity Conservation law and to the Environmental Impact Assessment legislation while it might also refer to relevant agriculture legislation.

1. Basic legal and regulatory framework applicable to small forest owners

1.1. Context to the legislation

The legal and regulatory framework for small forest owners in Greece is governed by a combination of national laws, constitutional provisions and forestry regulations designed to protect forest resources and ensure sustainable management.

1.2. Basic legal instruments

Constitutional Framework

Article 24 of the Greek Constitution (1975)[1] (as amended in 2001) provides the foundational legal protection for forests in Greece. It prohibits changes in forest land use unless necessary for public benefit, such as national economic needs or agricultural purposes in a way that benefits the public. Small forest owners are subject to these restrictions, meaning they cannot easily convert forest land to other uses. The constitution ensures that private property rights are respected but subject to restrictions that serve the broader public interest, especially in matters of environmental protection. Before the 2001 revision, the prohibition on changing the purpose of forests and woodlands referred only to public forests and woodlands; after the revision, the prohibition explicitly applies to both public and private forests and woodlands, with no distinction between the two categories.

Additionally, Article 17 of the Constitution protects property rights but allows restrictions to maintain the social function of ownership. These restrictions must not eliminate ownership, but they can reduce its value if necessary for public interest, security, or environmental protection.

Law 1650/1986 on the protection of the environment

Law 1650/1986[2], focuses on the protection and enhancement of the environment, establishing a comprehensive legal framework for environmental conservation. It addresses various aspects of environmental management, including air, water, soil and ecosystems, with specific provisions for the protection of forests.

In terms of forest protection, Law 1650/1986 categorises forests and forested areas as protected zones, where specific activities and land use changes are restricted to prevent deforestation and degradation. It outlines regulations to conserve biodiversity, manage forest resources sustainably and safeguard these areas against illegal activities, such as unauthorised logging or land clearing for agricultural expansion or urban development. This law also emphasises the restoration of

[1] Greek Constitution, Official Government Gazette, A' 111/09.06.1975.

[2] Law 1650/1986, Official Government Gazette, A,' 160/16.10.1986.

damaged forest ecosystems and the need for environmental impact assessments[3] before any project that could affect forested lands is approved.

Royal Decree 17-29 November 1836

According to Royal Decree of 17-29 November 1836[4], **private forests** are only those that were transferred according to the legal Ottoman formulas[5] and it is proven that they existed as private property before the beginning of the pro-independence war. Also, private forests are those located within large private estates - villages (*chiflíkia*[6]), even if they are not explicitly mentioned in the title of ownership of the properties, if it can be shown that they are contained within their boundaries.

Thus, regarding private forest property, this consists of forest properties that have been acquired by private individuals, natural or legal persons, either under the legal status of the Ottoman State (as explained above) or through legislative acts, concessions and transfers that have occurred since the establishment of the Greek State until today (see Section 3 for more information on ownership).

Law 998/1979 on forest protection

Law 998/1979[7] is central to regulating forest ownership and use in Greece. It outlines the legal framework for the management and protection of forests, including small privately-owned forests. The law prohibits deforestation and limits interventions in forests unless specifically authorised by the government.

Small forest owners are subject to strict prohibitions on activities that might endanger the forest, such as burning, clear-cutting or using inflammable materials. Violations can lead to criminal prosecution.

If small forest owners wish to undertake activities such as building or changing land use, they must apply for permission. Such interventions are allowed only if they do not harm the forest ecosystem or violate national forestry policies.

Forest Code (Legislative Decree 86/1969)

The Forest Code (Legislative Decree 86/1969)[8] establishes the legal framework for the protection, management, use and expropriation of forests and forestland. It outlines principles for sustainable forest management, defines forest areas and regulates activities like logging, grazing and land conversion. The decree also includes provisions for reforestation, fire prevention

[3] Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (codification) is transposed in the Greek legal system through Law 4014/2011, Official Government Gazette, A' 209/21.09.2011. This legislation also introduced amendments to Law 1650/1986.

[4] Royal Decree, Official Government Gazette, A' 69/01.12.1836.

[5] Referring to the legal documents that were issued by the competent Turkish authorities serving as proof of ownership.

[6] Chiflik, or chiftlik is a Turkish term for a system of land management in the Ottoman Empire.

[7] Law 998/1979, Official Government Gazette, A' 289/29.12.1979.

[8] Legislative Decree No 86 (Forest Code), Official Government Gazette, A' 7/18.01.1969.

and enforcement mechanisms to combat illegal activities, aiming to safeguard forest ecosystems and their environmental, economic and social functions.

Law 3208/2003

Law 3208/2003[9] introduced measures on the protection of forest ecosystems, the establishment of a forest inventory, as well as the property rights over forests and forest land in general.

1.3. Basic Regulatory framework

The National Forest Strategy 2018-2038[10] emphasises adopting and advancing the Mediterranean forestry model while promoting sustainability. It aims to enhance the contribution of forest ecosystems to the national economy by fostering multifunctionality, adaptability and their socio-economic role, particularly in the context of climate change.

According to the Strategy, the Mediterranean Forestry Model emphasises tailored planning tools and methods specific to various forest ecosystems, depending on their bioclimatic zones. It adapts to the unique characteristics of Greek forest ecosystems and the Mediterranean landscape, respecting its historic significance and local knowledge to preserve land-use diversity. Collaboration with local communities is central, promoting both traditional and innovative practices through interdisciplinary approaches and scientific research. The model contributes significantly to local development and employment, adding value to the Gross Domestic Product (GDP). It recognises the importance of non-public forest ecosystems, the role of grazing as a management tool and the contribution of hunting to environmental management. Biodiversity preservation is a priority, safeguarding genetic resources, species, ecosystems and landscapes while exploring sustainable exploitation in partnership with communities. Wetland functions and forest-meadow systems are protected and utilised, while forest ecosystems are shielded from illegal activities, biotic threats like diseases and abiotic factors such as fires and climate change through preventive and restorative management. Lastly, it employs tools and data to evaluate the economic and societal contributions of forest ecosystems, highlighting their significance and the work of managing organisations.

Furthermore, the National Forest Strategy outlines **priorities** such as restructuring the Forestry Service for optimised ecosystem management and sustainable forest product use, alongside developing comprehensive roadmaps for enhanced fire prevention and response. It emphasises systematic forest ecosystem management to reduce fire risks and the creation of fire-resilient settlements through collaboration between public services, local governments and citizens. A permanent mechanism for inventorying and monitoring forest ecosystems is planned, with a focus on innovation, continuous training and integrating research outcomes into practice.

[9] Law 3208/2008, Official Government Gazette, A' 303/24.12.2003.

[10] Ministerial Decision 170195/758/2018, Official Government Gazette, B' 5351/28.11.2018.

The strategy aims to increase the forestry sector's GDP contribution by improving forest product recording methods and enhancing the socio-economic role of forests, while also aligning forest ecosystems with the bioeconomy and circular economy. Adaptation and mitigation of climate change, including increased carbon sequestration, are central goals. Additionally, conserving biodiversity, restoring ecosystems and improving ecosystem services are prioritised, supported by better legal tools like forest maps and registers.

Networking among stakeholders and aligning national policies with international objectives strengthen public participation and efficiency. Lastly, the strategy highlights the need for active international political initiatives, particularly in the Balkan and Mediterranean regions, to address global forest-related challenges.

2. Governance and institutional framework

2.1. Distribution of competences between the State and Regional authorities

- **According to the legal framework, what are the relevant competences and responsibilities regarding decisions on forest management and forest management practices at the different State level (national, regional, municipal) in your country?** Please describe the situation stating the legislation and relevant provisions.

Legal background

The protection and management of forests in Greece are governed by Law 998/1979, which assigns primary responsibility to the Forestry Service, now under the General Secretariat of Forests established in 2022 within the Ministry of Environment and Energy. This reform centralised forest policy and operations, integrating regional Forestry Services and transferring their responsibilities, personnel, and resources to the Ministry. Locally, municipalities retain competences for parks, groves, and urban green areas, working in coordination with forestry authorities and the Ministry of Culture when necessary, ensuring comprehensive forest protection under constitutional safeguards.

National competences

According to Article 5(1) of Law 998/1979, the protection of forests and forest areas, as well as the adoption of the more specific measures provided for by this law, falls within the competence of the Forestry Service, acting in accordance with the relevant provisions or the specific provisions of this law. The General Secretariat of Forests and the corresponding position of Secretary General at the Ministry of Environment and Energy were introduced in 2022[11].

The Forestry Service now operates under the Ministry of Environment and includes the General Secretariat of Forests and the General Directorate of Forests, both overseen by the Deputy Minister. The General Secretary holds a higher position than the head of the General Directorate. Regional directorates, corresponding to the administrative regions of the country, fall under the General Directorate, while forest directorates operate at the prefectural level, with every prefecture having its own forest directorate. Previously, the system was more centralised and hierarchical, with the General Directorate issuing binding directives. Today, regional directorates enjoy greater autonomy. Forest management, including oversight of private forests, remains under the supervision of the Forest Service[12].

As explained on the webpage of the General Secretariat of Forests, the objective of the Secretariat is the protection, promotion and development of the forest ecosystems, so that Greek forests become “smart” and truly sustainable, by applying modern scientific knowledge and technological achievements for their protection and certified sustainable management, as well as their exploitation as sources of national wealth. The approximately 3000 Forestry Services executives, who were subordinate to the relevant Decentralised Administrations, were

[11] Presidential Decree No. 6 – Government Gazette 17/Α΄/04.02.2022.

[12] Interview with Forest Owner Association of Greece, 22.01.2025.

integrated into the General Secretariat, and thus the competence was transferred to the Ministry of Environment and Energy. The General Secretariat of Forests[13] includes:

- The General Directorate of Forests and Forest Environment,
- Forest Policy Implementation Inspections.

Regional competences

Pursuant to Article 3(1) of the Emergency Legislative Act[14] 13-8-2021/2021, the Forestry Services of the Decentralised Administrations of the Country are transferred to the Ministry of Environment and Energy, as a set of responsibilities, personnel, organisational positions and logistical infrastructure, and henceforth operate as its regional services.

Specifically, the following services of the Decentralised Administrations, with all the responsibilities exercised by them, are directly subordinate to the Secretary General of Natural Environment and Waters: a) General Directorates of Forests and Rural Affairs, with regard to the exercised responsibilities in the forest sector, renamed General Directorates of Forests, b) Directorates of Forest Coordination and Inspection, c) Forest Directorates, d) Reforestation Directorates and e) Forestry Offices. The Secretary General of Natural Environment and Waters undertakes the coordination and control of the projects and works the Decentralised Administrations carry out, with regard to the unified, timely and effective implementation of the exercised forest policy and the National Forest Strategy.

Local/municipal competences:

Parks and groves (under local/municipal competences) are afforded the full range of increased, constitutional protection provided for forests and woodlands. In particular, under relevant case law from the Council of State[15], parks and groves are afforded the same level of protection as the country's forests and woodlands. Their designated use is strictly prohibited unless explicitly provided for in the relevant urban plan. Moreover, the principle prohibiting the inclusion of forests or woodlands in urban plans is upheld.

Pursuant to Article 5(2) of Law 998/1979, the development, improvement, reforestation and protection of parks, groves and the tree-lined areas within towns or residential areas shall be the responsibility of the local authorities concerned or of the housing corporations which have undertaken to create them on the basis of a relevant urban planning study or of their own legal entities on the basis of specific provisions. In addition, the aforementioned care of forests or

[13] Ministry of Environment and Energy, General Secretariat of Forests, https://ypen.gov.gr/perivallon/dasi/geniki-grammateia-dason/.

[14] Pursuant to Article 44(1) of the Greek Constitution, under extraordinary circumstances of an urgent and unforeseeable need, the President of the Republic may, upon the proposal of the Cabinet, issue acts of legislative content. Such acts shall be submitted to Parliament for ratification, as specified in the provisions of article 72 paragraph 1, within forty days of their issuance or within forty days from the convocation of a parliamentary session. Should such acts not be submitted to Parliament within the above time-limits or if they should not be ratified by Parliament within three months of their submission, they will henceforth cease to be in force.

[15] For instance, Decision of the Council of State Nr 2301/2017 (E'), Nr 1261/2018, Nr 974/2005 and Nr 677/2010 and 3144/2004 (plenary session). Source: The legal protection of parks and groves, 2019, https://dasarxeio.com/2019/04/12/66683/#_ftn2.

woodlands or parks, groves and tree-lined areas located within archaeological sites shall be the responsibility of the competent departments of the Ministry of Culture. The above-mentioned services and organisations may, however, request the assistance of the Forestry Department, if the case arises. The Forestry Services shall cooperate with the other public services and local authorities or other legal persons under public law in the adoption of protection measures, the implementation of which is also within the competence of the services or legal persons concerned. The execution of all types of works in parks and groves shall be carried out following a study approved by and under the supervision of the competent forestry authority. This approval shall be preceded by a positive opinion of the competent department of the Ministry of Culture, where this is required for the protection of antiquities. The webpage of the Ministry of environment and Energy still includes a separate section on Decentralised Administrations and in particular Forestry Services; however, as explained further above, the Forestry Services of the Decentralised Administrations of the Country are transferred to the Ministry of Environment and Energy.

Forest coordination and advisory bodies:

Pursuant to Article 7 of Law 998/1979, a Forest Policy Council shall be established under the Ministry of Agriculture as an advisory and consultative body on matters relating to the protection and development of forests and forest areas and the exercise of the State's forest policy. In particular, the Forest Policy Council shall give its opinion: (a) on all kinds of draft laws and decrees, which have as their object the protection, exploitation or development of forests and forest areas and the implementation of the Government's forest policy; (b) on the declaration of an area as an aesthetic forest or national park or natural monument and on the measures to be taken in this regard; (c) on the adoption of multiannual national or regional forest development programmes; (d) on the adoption of measures for the protection of game and wild fauna or the adoption of measures against harmful game; (e) on any other matter expressly referred to it under the provisions of this Act, or which may be referred to it at the discretion of the Minister of Agriculture. In addition, this Council shall study the situation of forests and woodlands and recommend the adoption of the appropriate measures.

Pursuant to Article 8 of Law 998/1979, for the administrative recognition by the State of the ownership or other rights in real property of individuals or legal persons under public or private law over forests or forest areas, four Forest Property Councils shall be established, with their respective headquarters in Athens, Piraeus, Thessaloniki and Patras. The Forest Ownership Councils shall proceed with the recognition of the ownership or other property right at the request of the private individual or legal entity concerned, and shall decide on the basis of the information submitted by the latter and the data kept by the Forestry Service, they may also request other public authorities to send any useful document or other evidence or order a special investigation or expert opinion to form a definite opinion on the private rights claimed. Multiple applications relating to the same forest or forest area or contiguous sections shall be examined jointly. The aforementioned Councils shall, after reading the report of the designated rapporteur,

give a reasoned opinion on each case. The judgment of the Councils shall be based on a free assessment of the evidence referred to above. The opinion rejecting the application of a private individual or legal person shall be binding on the Minister, who may not, by its decision, recognise any right of the applicant. Where the Council has ruled in favour of recognising private rights in a forest or woodland, the Minister may either accept the opinion or reject the application of the person concerned by means of a specially reasoned decision or appeal to the Forest Property Review Board.

Pursuant to Article 8A of Law 998/1979, for the administrative recognition by the State of the ownership or other rights in property of private persons or legal entities under public or private law over forests and forest areas, at least four (4) Property Councils shall be established, with their respective headquarters in Corfu, Heraklion, Crete, Mytilene and Piraeus. The Property Councils shall proceed with the recognition of ownership or other rights in the property, at the request of the individual or legal person concerned. The Councils may also request other public authorities to send any useful document or other evidence or order a special investigation or expert opinion to be carried out in order to reach a definite judgement on the private rights claimed. Further applications relating to the same area or to consecutive sections shall be examined jointly. The abovementioned Councils, after reading the report of the designated rapporteur, shall give a reasoned opinion on each case. The judgment of the Councils shall be formed on the basis of a free assessment of the above evidence and shall be subject to the approval of the Minister for the Environment and Energy, who may accept or reject it, in whole or in part, but to the benefit of the State, but may not modify it to the detriment of the State.

Pursuant to Article 9 of Law 998/1979, the Ministry of Agriculture has a Technical Forestry Council as an advisory body on matters of forest management and the execution of forestry projects as well as the hunting economy. In particular, the Technical Forestry Council shall give its opinion on the approval or modification of (a) forestry studies relating to the management of forests and the execution of all kinds of works and projects, subject to the approval of the Ministry of Agriculture, (b) general programmes of all types of forestry works and projects relating to areas larger than the prefecture, as well as national annual or multiannual general programmes, (c) on the approval of the schedule of prices for forest products and the schedule of fees for harmful game, as well as on the timing of the practice or restriction of hunting, (d) on the reduction of the tax on forest products in cases where forest roads are opened in private forests or woodland; and (e) on any other matter which is referred to it by special provision of this or any other law, or on which it is consulted by the Ministry of Agriculture.

Also, a) advises: aa) on issues of regulations, technical specifications and diagrams of all forestry studies and forestry engineering studies and for the approval of studies of a general nature, b) on issues of procedures for the execution of projects, such as price analysis plans, general and specifications, and c) on general issues of planning in forestry and the approval of annual and multiannual programmes, (b) give an opinion on questions submitted by the Objections Committees for the resolution of technical issues of major importance in the procedure for the

validation of forest maps; and c) decides: aa) in cases of referral of a case following an annulment of a court decision concerning the validation of a forest map and bb) on the special character of the areas shown on a forest map until the establishment and maintenance of a Forest Inventory.

2.2. Key representation organisations of the forest sector

1. **Forest owners**:

Since 1926, the forest owner association of Greece represents the small private forestry sector in Greece. Its main areas of focus include the defence of forest property rights, the orientation of production to the market, the promotion of domestic tree species and the encouragement of traditional cultivation methods, with due regard to sustainability.

2. **Forest municipalities**:

The Union of Municipalities and Communities of Greece (KEDE), which includes forested areas, often collaborates with the Ministry of Environment and Energy on policy and forest conservation programmes.

3. **Forest industry**:

Union of Greek paper mills (EVICHE) represents companies involved in paper production, emphasising sustainable sourcing and production standards.

The Panhellenic Timber Association was established in 1960. The association's main concern is to make wood a sustainable choice, to emphasise its ecological character, to support international initiatives concerning forests worldwide, governance and climate change, as well as the implementation of a code of ethics. The association is an active member of the ETTF (European Timber Association) and the Federation of Industries of Greece, as well as its close collaboration with the AHEC (American Hardwood Export Council).

4. **Forest clusters**:

No relevant clusters were identified.

5. **Forest contractors**:

No relevant contractors were identified.

6. **Forest Professionals**:

Panhellenic Union of civil servant foresters (PEDDY) is a professional association in Greece that represents foresters who work as civil servants.

Directory of forestry offices & forestry directorates is the main agency for the development, protection and management of the country's public forests, the forestry policy and forestry supervision and surveillance of non-public forests is the Forestry Service.

Online community of forestry professionals is a digital platform that connects forestry professionals across Greece.

7. **Forest Agents or rangers**:

Panhellenic federation of civil servant forest guards represents forest guards who work as civil servants across Greece.

Register of voluntary civil protection organisations includes non-profit voluntary organisations, whose purposes include the pursuit of civil protection actions and have at least twelve (12) members with the status of Civil Protection Volunteer.

8. **Forest Sciences**:

Hellenic forestry society is a scientific society promoting research, education and the advancement of forestry science in Greece.

Universities with forestry departments: Key institutions include the Aristotle University of Thessaloniki (Department of Forestry and Natural Environment), the Democritus University of Thrace (Department of Forestry and Environmental Management and Natural Resources) and the University of Thessaly (Department of Forestry, Wood Science & Design), which contribute to forest science education and research.

9. **Forest certification:**

No relevant forest certification bodies were identified.

10. **Public enterprises**

No relevant public enterprises were identified.

11. **Forest cooperatives**

Register of forestry cooperatives (MIDASO) is a centralised system for the registration and management of forestry cooperatives. Forestry Cooperatives are an autonomous association of persons, which is formed voluntarily and seeks the economic, social and cultural development of its members through a common enterprise with equal cooperation and mutual assistance.

12. **Other Forest organisations**

WWF Greece is actively engaged in forest conservation, with significant efforts in protecting natural forest ecosystems and promoting sustainable forest policies.

Hellenic society for the protection of nature is an NGO focusing on forest protection and environmental education, working on reforestation and preservation of native forests.

Hellenic Ornithological Society is a Greek non-governmental body dedicated solely to the conservation of wild birds and their habitats in Greece.

ARCTUROS is a non-profit, non-governmental, environmental organisation founded in 1992, focusing on the protection of wildlife fauna and natural habitat.

3. Forest land ownership structure

- **According to State statistics, what is the ownership structure of the forest in your country (at State level)?** Please include relative and absolute data of forest ownership types, including average size of public and private forests and the number of area of forests in each size category)

3.1. Data on national forests ownership structure

According to the data gathered by the European Forest Institute, the state forest lands cover a high percentage (65.5%) of the total area. The remaining 34.5% belongs to private entities, local authorities, monasteries and other wildlife institutions. Municipalities are the second larger owner with 12% of the forest cover. Forest cooperatives own 9.7% while the forestland owned by private individuals accounts for only 8% of forestry land[16].

The 1992 National Forest Inventory in Greece did not classify forests by ownership size, although the areas in the Inventory are now categorised this way. The size of forest holdings is crucial, as small holdings are not viable for competitive exploitation. The Forest Law's prohibition against fragmentation has helped maintain relatively large forest holdings, **resulting in few small-sized state and private properties**.

As a side note, it has to be considered that, alongside public and private forests, there is a category of forests known as "occupied forests". These are forests whose ownership status remains unresolved with the State, which claims ownership, while third parties also assert ownership. Occupied forests are estimated to make up 5%-10% of all forest areas. The term "occupied" does not have a formal legal definition. The issue dates back to 1836, when an attempt was made to resolve disputes over these forests through a special committee, but it was unsuccessful. Since 1900, these forests have been referred to as "occupied", and their alleged owners do not have recognised titles. There are various sub-categories of occupied properties, such as those where court decisions recognised private ownership, yet the State retained ownership, or cases where properties were bought and sold with invalid titles or transfer contracts, often without court rulings or proper property settlements[17].

In Greece, private forest holdings of 2-50 hectares make up only 3.2% of the total forest land, one of the smallest percentages in Europe[18].

[16] Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report.

[17] GKLS Consultants Engineering; https://gkls.gr/our-services/dasikoi-xartes/dasikoi-xarakthrismoi-ektaseon/#1553417665565-ffebcaf4-06bf.

[18] Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report.

3.2. Definitions of forest ownership in your country

Please provide the definitions identified in the legislation applicable in your country following the guidelines shared with you.

- **Forest owner**

A significant part of the property registered with the State as the beneficiary comprises forest areas. Under the presumption of ownership established by the Royal Decree of 1836, and reaffirmed by Article 62(1) of Law 998/1979, these areas are considered public until officially recognised as private.

Regarding private forest property, this consists of forest properties that have been acquired by private individuals, natural or legal persons, either under the legal status of the Ottoman State (as explained in the next paragraph) or through legislative acts, concessions and transfers that have occurred since the establishment of the Greek State until today.

According to Article 1(1) of the Royal Decree of 1836, private forests are only those that were transferred according to the legal Ottoman formulas and it is proven that they existed as private forests before the beginning of the war for independence. Article 1(2) stipulates that those forests lying within large private estates - villages (*chiflikia*), even if they are not explicitly mentioned in the title of ownership of the properties, shall also be considered as private, provided that it is clear that they are contained within their boundaries. Subsequently, Article 3 of the Decree of 1836 requires the owners of forests referred to in Article 1 to produce the title of ownership before the Secretariat for Finance within a period of one year from the publication of the Decree, after which the forests are considered to be undisputed national forests.

Apart from the above provisions, there is no explicit definition of forest owner.

- **Forest holder**

Although the term is used in the context of the national legislation, no explicit definition could be identified. It should be noted that the term 'holder' in the Greek legislation is a legal term used in property law, referring to the physical possession of an item and not to any associated right (in contrast, the owner holds the property right). As regards some uses of the term 'holder', Article 46a (1) of Law 998/1979 provides that for reasons of public interest, forest land that was cleared for agricultural use before the entry into force of the 1975 Constitution and which has maintained this use until today, is not subject to the provisions of the forestry legislation, prohibiting any other use by its holder. Moreover, pursuant to Article 73(5) of Law 998/1979, land which was granted as forest to communities before the year 1940, shall belong by ownership to the holders of the land up to thirty (30) acres per holder.

No link was identified between the concept of a 'forest holder' and that of economic forest activity.

- **Forest manager**

No definition could be identified in the national legislation.

- **Forest contractor**

No explicit definition could be identified.

- **Forest**

Pursuant to Article 3 (1) of Law 998/1979, Forest or forest ecosystem (δάσος ή δασικό οικοσύστημα) means the organic whole of wild plants with a woody trunk on the necessary surface of the soil, which, together with the coexisting flora and fauna, constitute, through their mutual interdependence and interaction, a special bio-community (forest bio-community) and a special natural environment (forest).

In addition, pursuant to Article 3(2) of the same Law, a forest area exists when wild woody vegetation, tall or bushy, is sparse in the above-mentioned aggregate.

3.3. Forest ownership types in your country

☐ Please provide a **description of the types of forest ownership** (e.g. public forest, private forest) identified in the legislation applicable in your country. **Are there specific laws** for certain types of collective, communal, vicinal or neighbourhood forests?
Pursuant to Article 9(1) of Law 3208/2008, forests and forest lands in Greece are divided into public and private ownership. Article 9(2) further stipulates that changes to the purpose of these lands are generally prohibited for both public and private forests, except when prioritising national economic interests, such as agricultural use or other public interests in accordance with specific forestry legislation[19].

Forest ownership in Greece is governed by both private and public law. Private law includes provisions such as those in the Civil Code's "Law of Neighbours". For instance, pursuant to Article 1009 of the Civil Code, fruits that fall on the neighbouring property from a tree are counted as fruits of the property on which they fall. The provision does not apply if that property is in common use. Moreover, pursuant to Article 1012 of the Civil Code, if a property lacks the necessary access to the road, the owner has the right to demand access from the neighbours for a corresponding compensation. Public law addresses broader regulatory and environmental protections. A significant portion of forest land is presumed to be public property under the Royal Decree of 1836, a presumption upheld in Article 62(1) of Law 998/1979, which states that forests are considered public until proven otherwise.

An exception to this presumption applies under Article 62(2) of Law 998/1979 for specific regions, including the Ionian Islands, Crete, Lesvos, Samos, Chios, the Cyclades and the areas of Kythera, Antikythera and Mani (Eastern and Western), where these ownership presumptions do not apply.

The Royal Decree of 1836 further defines private forest ownership. Article 1(1) establishes that private forests include only those documented as private under Ottoman legal provisions, provided they existed as private lands before the Greek War of Independence. Article 1(2)

[19] Law 3208/2008, Official Government Gazette, A' 303/24.12.2003.

includes forests within large private estates (*chiflikia*) within private ownership boundaries, even if not explicitly mentioned in ownership titles. Article 3 of the Decree requires owners of forests identified in Article 1 to submit ownership titles to the Secretariat for Finance within one year of the Decree's publication. Failing this, such lands are considered undisputed national forests.

Apart from the forest properties that have been acquired by private individuals, natural or legal persons under the legal status of the Ottoman State, forest properties may also be acquired through legislative acts, concessions and transfers that have occurred since the establishment of the Greek State until today.

☐ Are there well-established programs for forest land consolidation? Are there public bodies promoting or responsible for these programs?
No relevant well-established programmes were identified.

3.4. Proof of ownership: Land registry and Cadastre

- How is ownership proved?

Proof of ownership in Greece is typically established through a combination of title of the ownership (legal documents proving ownership), property contracts and registration in the Hellenic Cadastre. The Cadastre was established in 2003. By the beginning of 2022, 85.7% of the territory had been registered.

Historically, property rights were proven through various private documents and sometimes through local or informal declarations, but the Cadastre promotes a move towards a centralised and standardised registry for all types of land. The Cadastre aims to resolve ambiguities by recording clear titles for all types of land, including forested areas[20]. In Greece, there is no specific register solely dedicated to forest owners. Instead, forest management and land registration fall under the broader framework of the Hellenic Cadastre, which encompasses all land properties, including forests[21].

Regarding the National Forest Inventory, in Greece there has been only one Forest Inventory, during which not the whole country was inventoried, but only 86.2%. The first inventory was carried out by the Forestry Service and was completed in 1992[22]. It does not prove ownership.

The National Forest Map Programme, initiated in 1998, serves as a significant tool for mapping forest areas, but it does not constitute a traditional registry for forest industries or contractors[23]. By 2023, forest maps had been published for 95% of the territory, the remaining 5% are for areas within the boundaries of settlements and town plans. 90% of the forest maps have been ratified. The difference is due to the fact that no validation has been carried out on areas where objections and requests for correction of manifest errors have been submitted[24].

[20] Ministry of Digital Governance, National Cadastre.
[21] Ministry of Digital Governance, National Cadastre.
[22] Results of the first National Forest Inventory, 2020.
[23] Ministry of Digital Governance, National Cadastre: forest maps.
[24] Forest maps: 22 questions and answers, 2023.

With respect to the connection between the Cadastre and the Forest Councils, as outlined in section 2.1 (Articles 8 and 8A of Law 998/1979), the Cadastre acknowledges as private land only those areas that have already been recognised as such by the Forest Councils. Any land not previously recognised by the councils is not classified as private by the Cadastre[25].

- Is there a legal obligation to register **ownership/property**?

Yes, there is a legal obligation to register ownership/property within the Cadastre established in Article 2(3) of Law 2308/1995 in conjunction with Articles 4 and 12 of Law 2664/1998. Owners must register their property, including forest lands, with the Cadastre, which serves as the official property registry. For forest land, registration is mandatory and failure to register can result in penalties or even the property being designated as "unknown owner", which may later transfer to state ownership if not claimed and registered within a certain timeframe.

- Is there a registration fee?

Yes, there is a registration fee to record property in the Hellenic Cadastre. The fixed fee is EUR 35 per right. The fixed fee you have to pay is calculated automatically when the declaration is submitted and depends on the location, type and number of properties[26].

- **Is there an official register of forest owners and of forest holdings? Is it shared with agricultural registers? Is it harmonized with the general property/ownership register?**

Currently, there is no separate, dedicated official register specifically for forest owners and forest holdings. Instead, forest land ownership is recorded in the general property registry under the Hellenic Cadastre, which includes all land types (forests, agricultural lands, residential, etc.).

- Is the **Cadastre/register** well updated and reflecting real forest owners/holders?

The Hellenic Cadastre is an ongoing project and while it has progressed significantly, not all areas of Greece are fully updated. Urban areas tend to have more up-to-date records than rural or forested regions, where registration is still ongoing. This is particularly true in forested areas where traditional and unclear ownership can make accurate updates challenging.

[25] Interview with Forest Owner Association of Greece, 22.01.2025.

[26] Ministry of Digital Governance, Land registration, Payment of land registration fee. The use of "calculated" refers to summing up the fixed fees for the applicable properties or rights rather than implying a dynamic or variable fee structure. The fee remains fixed.

4. Rights and obligations: forest owner/holder and forest contractor

4.1. Overview

- **According to the legal and regulatory framework what are the rights and obligations of forest owners/holders and forest managers in your country?**

Forest owners

Rights

Financial support and Subsidies

Forest owners are eligible for financial support for forest development and protection, funded by the national budget and public investment budget.

Funds are used exclusively for forest management, reforestation, erosion control and conservation projects.

Approval of funding requires a proposal aligned with the Ministry of Agriculture's development policy.

Tax exemptions

While specific tax exemptions are not outlined, there are provisions allowing for the reduction of taxes on forest products under certain conditions.

Forest management decisions

Forest owners can decide on forest management practices following national forest policy, emphasising sustainable and equitable benefits. Restrictions apply for forests intended for specific purposes (e.g., historic, artistic, or protective uses).

Harvesting rights

Harvesting is generally allowed under forestry management plans and has to respect some requirements. Exceptions exist for limited agricultural cultivation, with specific limitations on deforestation and land clearing.

Citizens' rights to access and use

Greek law does not explicitly guarantee free access to forests, but it is generally allowed unless restricted for conservation or property reasons. Forest products belong to landowners under Article 1064 of the Civil Code, though in practice, visitors often collect them without strict enforcement.

Limitations on rights

Land use conversion

Changing forest land to agricultural or urban use is restricted unless justified for public benefit (e.g., economic development).

Harvesting and non-forest activities

Clear-cutting and extensive deforestation for agriculture are generally prohibited, with limited exceptions.

Non-forest activities like construction, mining and infrastructure are allowed under strict legal conditions.

Third-party access

Forest owners must allow access for specific purposes (e.g., roads, tourist facilities) if deemed necessary for public interest.

Obligations

Forest Management Requirements

Forest owners must conduct sustainable management practices, including regeneration, reduction felling and reforestation.

Owners must allocate a portion of their net income from forest exploitation for forestry improvements.

Fire prevention and protection

Owners are required to protect forests against fire and other risks, including reforesting damaged areas.

Permits for activities

Forest management requires a plan, which includes permits for large-scale projects that may impact the environment.

Forest road maintenance and fencing

Owners must open and maintain forest roads and protective works in line with conservation needs.

Land tax and registration

Forest land is subject to Uniform Real Estate Property Tax (ENFIA) property tax and additional taxes may apply based on forestry income.

While there is no specific forest registry, forest ownership is recorded in the Hellenic Cadastre.

Forest managers

N/A – See section 4.5.

4.2. Legal rights of the forest owner/holder

- **Right to financial support/tax exemptions/subsidies? What are the requirements?**

Financial support

Pursuant to Article 8 of Law 3208/2003, the development, exploitation and protection of the country's forest areas are **financed** from the regular budget and public investment budget, without excluding other forms of financing.

All funds collected for forestry purposes are allocated exclusively to forest management, reforestation, erosion control, infrastructure development, conservation projects, research and other forest-specific purposes. The resources are dedicated to the protection and sustainable development of Greece's forest and wildlife resources, including maintenance of forest roads, creation of recreational areas and conservation of protected areas.

A formal programme proposal, required by Law 2503/1997, must be submitted to the regional forestry department, approved by the General Secretary and finally approved by the Ministry of Agriculture. This proposal outlines the priority and urgency of various forestry projects, aligning them with the Ministry's general development policy.

Following approval, the Central Fund for Agriculture, Livestock and Forests Board allocates funds to the Regional Development Funds for forestry projects. These grants are deposited in a designated "Special Forest Fund" bank account.

Law 3889/2010 transferred the 'Special Forest Fund' of the 'Central Fund for Agriculture, Livestock and Forestry' to the 'Green Fund' and further renamed the 'Central Fund for Agriculture, Livestock and Forestry' to 'Agriculture and Livestock Fund', whose resources consist solely of revenue from agricultural and livestock activities[27].

The 'Green Fund' is a legal entity, established by the aforementioned law, which finances programmes, including for the protection and upgrade of forests[28], drawn up by the Ministry of Environment and Energy or other Ministries and their supervised organisations, decentralised general administrations, local authorities, legal entities of the wider public sector, and associations or other forms of associations of legal and natural persons, which, in accordance with their statutory objectives, aim to protect, upgrade and restore the environment.

Tax exemptions

No particular provisions on tax exemptions could be identified. However, pursuant to Article 9 of Law 998/1979, the Ministry of Agriculture has a Technical Forestry Council as an advisory body, inter alia, on matters of forest management and the execution of forestry projects. In particular, the Technical Forestry Council gives its opinion on the approval or amendment of, inter alia, the **reduction of the tax on forest products** in cases where forest roads are opened in private forests or forest areas.

[27] See article 12 of Law 3889/2010 (Government Gazette A' 182/14-10-2010).

[28] Προστασία & Αναβάθμιση Δασών - Πράσινο Ταμείο - Ψηφιακή Πλατφόρμα Ενημέρωσης.

- **Is there a right to decide about the forest management practices in their forest land?**

Pursuant to Article 62 of the Forest Code (Legislative Decree 86/1969), forestry and soil cultivation in public or non-public forests shall be carried out in accordance with the provisions of this Code, in order to achieve the forestry and soil cultivation objectives in the best interests of the forest owner, in conjunction with the forest policy demands serving the national interest, both in terms of increasing forest production and the national benefits from forests and in terms of the fair distribution of the forestry economic goods and benefits derived from forests among all classes of the nation, forest producers and consumers.

Additionally, in forests intended for the landscaping of sacred, historical, artistic places or in protective ones, the forest management and the general exploitation thereof shall be carried out in a way that does not interfere with the main purpose for which they are intended.

In the exercise of both forestry on public forests and the State's forest policy supervision of private forests, an effort shall be made to apply the seedling form on an area of land through regeneration and reduction logging or afforestation.

Pursuant to Article 151(1) of the Forest Code (Legislative Decree 86/1969), the commercial exploitation of forests owned by a forest owners' cooperative shall be conducted based on a forestry plan, report, or logging plan. This may occur either through an auction or directly without an auction. In such cases, the work must be carried out by a contractor primarily employing members of the forest owners' cooperative.

If conducted without an auction, the work may be done by a group of forestry workers or a forestry workers' cooperative. In this arrangement, if the group or cooperative takes ownership of the forestry products, they will pay rent to the forest owners' cooperative. Additionally, if the forestry cooperative receives the products from the workers' group or cooperative after felling, shaping and transporting, the rates for these services will be set by a designated committee or, in case of disagreement, by the Panhellenic Confederation of Agricultural Cooperatives.

- **Is there a right to harvest?**

There is a right to harvest, but it is subject to strict legal limitations under Article 47(1) of Law 998/1979. While the deforestation of forests for agricultural cultivation is generally prohibited, exceptions allow the clearing of forest land for specific purposes. These include agricultural or horticultural cultivation, planting mixed wild and fruit-bearing trees, cultivating forest species for products like chestnuts, walnuts and truffles, or establishing vineyards and aromatic plant plantations. Such activities are limited to up to 30 acres for individuals and must comply with relevant regulations[29].

[29] Law 998/1979, Official Government Gazette, A' 289/29.12.1979.

4.3. Limitations to the rights of forest owner/holder

- **Is there a limitation to change the land use of the land (from forestry to agriculture and/or urbanization)?**

As mentioned further above, Article 24 of the Greek Constitution (1975) provides the foundational legal protection for forests in Greece. It prohibits changes in forest land use unless necessary for public benefit, such as national economic needs or agricultural purposes in a way that benefits the public. Small forest owners are subject to these restrictions, meaning they cannot easily convert forest land to other uses. The constitution ensures that private property rights are respected but subject to restrictions that serve the broader public interest, especially in matters of environmental protection[30].

Pursuant to Article 9(2) of Law 3208/2008, changes to the purpose of these lands are generally prohibited for both public and private forests, except when prioritising national economic interests, such as agricultural use or other public interests in accordance with specific forestry legislation.

The prohibition to change the use of the forest implies for the private owner not a loss of ownership but strict restrictions on the owner's right to use, harvest and dispose of the forest.

- **Is there a legal limitation to the right to harvest? Is there a ban on clear cutting?**

Pursuant to Article 47 (1) of Law 998/1979, the deforestation of forests to be used for agricultural cultivation of any kind is prohibited. However, exceptions allow for limited clearing of forest land by agricultural cooperatives, producer groups or individuals for specific uses, such as agricultural or horticultural cultivation, planting mixed forest and fruit-bearing trees or establishing vineyards and plantations for aromatic plants. These activities are permitted within designated limits (up to 30 acres for individuals) and are subject to additional regulations[31].

- **Are there limitations to carry out non-forest activities in forest land (like mining, energy plants, etc.)?**

Article 67A of Law 998/1979 introduces an explicit prohibition of construction within a forest area, regardless of its ownership status, in order not to change its purpose and the relevant right to use private forest land is limited only to the exceptions of permissible interventions allowed by the Articles 45 et seq. of Law 998/1979, as currently in force. However, these exceptions have become particularly numerous in order to enable the maximum permissible use of the land for reasons of public interest. Notably, interventions are permitted under the legal conditions set out in the law and, in the case of third-party intervention on privately owned land, require the written consent of the owner. These interventions include, among other provisions (para. 2 Article 45 of Law 998/1979):

[30] Greek Constitution, Official Government Gazette, A' 111/09.06.1975.

[31] Law 998/1979, Official Government Gazette, A' 289/29.12.1979.

- Opening of roads (Article 48)
- Tourist facilities (Article 49)
- Campsites (Article 50)
- Industrial installations (Article 51)
- Mining - quarries (Article 52)
- Infrastructure projects (Article 53)
- Cultural projects (Article 54)
- Military projects (Article 55)
- Trekking shelters (Article 56).
- Sports facilities, educational buildings with their associated facilities, hospitals, sanatoria and facilities of the Regional Health and Welfare Systems, sacred churches and all kinds of monasteries, their monasteries or hermitages, prisons, Security Corps facilities, solid and liquid waste storage and treatment facilities, traditional-type water mills, botanical gardens (Article 57).

- **Are there specific limitations to carry out agricultural activities, like extensive grazing or temporary cultivation, on forest land?**

Article 47(1) of Law 998/1979 prohibits the deforestation of forests for agricultural cultivation. However, certain exceptions are allowed under strict conditions. These include the limited clearing of forest land by agricultural cooperatives, producer groups, or individuals (up to 30 acres for individuals) for specific purposes, such as agricultural or horticultural cultivation, planting mixed wild and fruit-bearing trees, or establishing vineyards and plantations of aromatic plants. Activities like the grafting of wild fruit trees are also permitted.

Moreover, pursuant to Article 47A of Law 998/1979, by way of derogation, the establishment of livestock farms, beehives, hunting farms, fur-bearing farms and farms for the breeding of endangered and endangered indigenous breeds of farm animals, for the purpose of the preservation, dissemination, promotion and traditional management of the abovementioned livestock and their products is permitted in forest areas and public grassland and rocky areas and, if none exist in the area of interest, within forests[32].

- **Is hunting right linked to ownership right? Is it considered a forest activity or does it have specific regulations?**

Hunting is not linked to ownership right. Hunting is in principle allowed to be practiced as a sport throughout the territory (Article 251(1) of Forest Code (Legislative Decree 86/1969)), but it is subject to strict legislation, because it is a form of management of wildlife protected under Article 24 of the Constitution and is subject to conditions to ensure the full conservation of fully protected and huntable species, with special care for the protection of migratory species. Hunting is provided for by the Forest Code in a specific section.

[32] Law 998/1979, Official Government Gazette, A' 289/29.12.1979.

Furthermore, according to Article 253 of the Forest Code (Legislative Decree 86/1969), the Minister of Agriculture may issue decisions, published in the Government Gazette, to establish Controlled Hunting Areas. These areas, clearly delineated in the decision, are designated for the protection and preservation of the natural environment and the conservation, development and sustainable use of game resources and wildlife. Within these zones, hunting may be either strictly prohibited or permitted under specific conditions. Following, pursuant to Article 254(11) and (12) of Forest Code (Legislative Decree 86/1969), all revenues of any kind derived from the game management of the controlled hunting areas shall be paid into the Central Fund for Agriculture, Livestock and Forests. The owners of the land within the controlled hunting area shall be entitled to a share of the net income of the hunting area, the determination, procedure and method of payment of which shall be determined by a decision of the Minister of Agriculture.

- **Are there citizens' rights to collect wild products in forest land? Are they linked to the ownership right or not?**

Ownership of forests may be limited by certain rights of third parties, including citizens, related to the enjoyment of certain benefits of the forest. Such rights are in the nature of personal or de facto servitude and may have a variety of content, as long as it is in harmony with the nature and economic function of the forest. These rights may be established over both private and public forests and are provided for in Articles 56 and 57 of the Forestry Code (Law 86/1969). There are no specific legal provisions regulating the collection of forest products by individuals other than the owner. According to Article 1064 of the Civil Code, the products of the land typically belong to the landowner. However, in practice, individuals walking in the forest often collect forest products, as this provision is not strictly enforced[33].

Pursuant to Article 56 of the Forestry Code (Law 86/1969), traditional rights such as resin collection, oak berry gathering, grazing, and timber cutting, acquired through long-standing customary practice on public forests or forested areas, are recognised and respected. However, these rights must not obstruct the State's ability to manage and exploit these forests or implement necessary protective measures for forest regeneration after logging. In regions where harvesting rights are traditionally exercised by local residents, even if such rights are leased by the State, the residents are entitled to exercise these rights without paying rent. Additionally, traditional rights to resin collection, oak berry gathering, grazing, and timber cutting that existed prior to the State granting public forests to individuals after 1922 remain intact, allowing residents to freely exercise these rights.

Pursuant to Article 57 of the Forestry Code (Law 86/1969), limited harvesting rights in public or private forests may be subject to adjustments upon request by the forestry authority, the beneficiary or the forest owner. These adjustments may include: (a) temporary restrictions, imposed within the limits of the forest's capacity and productivity; (b) permanent clarification

[33] Interview with Forest Owner Association of Greece, 22.01.2025.

and definition of the rights' scope and boundaries; or (c) the termination of such rights through financial compensation, provided there are no significant social objections to their compensation.

These rights are not linked to ownership rights.

- **Are there rights to access (walking) on forest land? Are there specific regulations for public use of forest land, hiking, riding, biking, etc.?**

Pursuant to Article 24(1) of the Greek Constitution, the protection of the natural and cultural environment is an obligation of the State and a right of everyone.

Ministerial Decision No 151344/165/2017, as currently in place, provides for the definition of technical specifications for the establishment, marking, opening and maintenance of hiking trails. This decision provides also rules on biking trails[34].

Greek legislation does not explicitly provide for the right to walk freely in forests, but it is generally not restricted[35]. Although no specific article guarantees this right, it can be inferred from broader provisions concerning the use and protection of forests. For instance, Article 45 of Law 998/1979 regulates permissible interventions in forests and reinforces their protection. While this article does not prohibit public access, access may be restricted in certain cases, such as for environmental conservation or due to property ownership limitations.

4.4. Forest owner/holder obligations and requirements.

- **Which requirements or obligations regarding forest management are imposed on owners?**

The forestry legislation provides that the forest owner must tolerate the interference of the competent state authorities in their forest area on the one hand and on the other hand, they must take the actions required by law for the conservation of forest wealth, in particular the carrying out of regeneration and reduction felling or reforestation (a. 62(4) of the Forest Code), the opening of forest roads (Article 15(2) of Law No 998/1979) and the carrying out of the necessary protective technical works (Article 16(4) of Law No 998/1979). 998/1979), the allocation of up to 30% of the net income from the exploitation or leasing of the forest property for the execution of forestry works, opening roads, planting or cultivation of fast-growing species, carrying out reforestation, improvement or extension of forest vegetation on the property (Art. 17 par. 4 a' and b' of Law 998/1979), the guarding and protection of private forest in case of fire (Article 18 par. 1 and 33 of Law 998/1979, Article 183 of the Forest Code) and the reforestation of destroyed private or forest property (Article 42 par. 2 of Law 998/1979).

- **Is there a tax** imposed on forest ownership?

Landowners, including forest landowners, pay the ENFIA tax, a property tax based on the property's assessed value. This tax includes a main tax and an additional tax on high-value

[34] Ministerial Decision No 151344/165/2017, Official Government Gazette, A' 2016/30.01.2017.

[35] Interview with Forest Owner Association of Greece, 22.01.2025.

properties. Property owners who hold land that is used for non-residential purposes, like forestry or business, may also incur other specific property-related taxes.

Moreover, pursuant to Articles 71 and 72 of Presidential Decree 30-11-1928/1928, the gross forestry income of sustainably or periodically managed non-public forests (private, communal, monastic, inter-family, etc.) is considered taxable if it results from the logging of all or part of the annual or periodic harvest of the amount determined for these forests by the logging tables, the temporary management reports, the permanent or temporary management plans, management programmes, etc. Taxable is also the gross profit. Also taxable is also the gross profit derived from the sale or withdrawal of forest products of private forests, resulting from accidental events (such as the destruction and uprooting of trees by snow, wind and other external causes and effects), from forest products from the burning of private forests and woodland, from the clearing of private forests and woodland and, in general, from all forest products logged, harvested and constructed from private forest land. The tax rate is set at 10% for gross forestry income derived from primary forestry products and 8% for gross forestry income derived from secondary forestry products[36].

- **What type of permits the forest owner needs** to manage their land?

The forest owner needs to have a forest management plan which is mainly a technical report focusing on sustainable timber yield without taking into account consideration the non-timber products and services of the forest resource[37].

Pursuant to Article 141(4) of the Forest Code (Legislative Decree 86/1969), the management of non-public forests included in forest complexes for which forestry plans or reports are prepared by forestry teams of the public service may be carried out on the basis of reports prepared by such teams. Each forest owner shall bear the part of the costs paid for the preparation of the entire study which is proportionate to the size of their forests and which, in the event of refusal, shall be collected administratively in accordance with the provisions on the collection of public revenue, after the Ministry of Agriculture has settled the costs incurred by each forest owner.

Moreover, for large scale projects or activities whose construction or operation may have an impact on the environment, the forest owner should conduct an environmental impact assessment, as provided in Law 4014/2011[38].

- **How is the control of forest harvest determined? Is there an obligation to mark every tree to be cut or retained?**

Regarding the harvest put in place by the owner, no specific obligations and controls on owners could be found, apart from the legal limitations to the right to harvest (see 4.3. Limitations to

[36] Presidential Decree 30-11-1928/1928, Official Government Gazette, A' 252/30.11.1928.

[37] Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report; Article 63 of the Forest Code (legislative Decree 86/1969).

[38] Law 4014/2011, Official Government Gazette, A' 209/21.09.2011.

the rights of forest owner/holder). No information was found on a potential obligation to mark every tree.

Regarding the harvest put in place by third parties, there is control on logging activities. Logging is the right to take timber from public or non-public forests for individual needs or for the needs of the inhabitants of neighbouring towns and villages or the needs of cooperatives, small-scale enterprises, lignite mines or for marketing or other purposes. Logging is considered a servitude. It is carried out after obtaining a licence, which, however, is issued for public forests on payment of a rent and for non-public forests on payment of a public forest tax. In addition, the logging operation in non-public forests requires written permission from the forest owner or forest holder (if the forest owner is not in possession of the forest).

- **Are there technical, administrative or economic specifications on the forest products market? Are forest harvest contracts legally defined for public or private forests or for some specific types?**

N/A.

- **Is there an obligation to prevent forest fires or other risks?**

The forestry legislation provides that the forest owner must tolerate the interference of the competent state authorities in their forest area on the one hand and on the other hand, they must take the actions required by law for the conservation of forest wealth, inter alia, the guarding and protection of private forest in case of fire (Article 18(1) and 33 of Law 998/1979, Article 183 of the Forest Code) and the reforestation of destroyed private or forest property (Article 42 par. 2 of Law 998/1979).

Additionally, the fire service is usually publishing guidelines for the protection of public and non-public forest areas. The national legislation is focusing more on the protection of reforested areas. For instance, pursuant to Article 34 of Law 998/1979, for forest fires it is provided that after the suppression of the fire, the area must be kept in order to prevent any risk of rekindling, while the forester takes the necessary administrative actions for the area to be defined (aerial photography, mapping) and reforested (Art. 34 Law 998/79).

- **Is fencing or the use of forest roads regulated?**

The forestry legislation provides that the forest owner must tolerate the interference of the competent state authorities in their forest area on the one hand and on the other hand, they must take the actions required by law for the conservation of forest wealth, including the opening of forest roads (Article 15(2) of Law No 998/1979) and the carrying out of the necessary protective technical works (Article 16(4) of Law No 998/1979), the allocation of up to 30% of the net income from the exploitation or leasing of the forest property for, inter alia, the opening roads (Article 17(4)(a) and (b) of Law 998/1979).

- **Is there an obligation for forest owners and/or forest managers to be associated?**

No particular rules could be identified in the national legislation.

4.5. Forest manager/contractor obligations

No specific rules regarding forest managers or contractors could be identified in the national legislation. This role is not formally recognised under Greek law.

- **Which requirements or obligations on forest management are legally imposed on forest managers/contractors**?

Pursuant to Article 19(1) of Law 3208/2003, private forests as well as forests co-owned with the State, whose management and exploitation has been abandoned for more than twenty years, are put under management by the competent forestry authority, for reasons of environmental protection and promotion of the national economy. A prerequisite for the above action of the forestry authority is its determination, by a specially reasoned relevant act, that the owners of these forests are objectively unable to manage or exploit them. The revenues from the exploitation of the above forests, after deduction of all kinds of costs and rights in favour of the State, shall be legally assigned by the State to the beneficiaries. When they are paid out, an additional ten per cent (10%) shall be withheld, which shall be deposited in favour of the Green Fund under the special code "Special Forestry Agency" and shall be used exclusively for forest management, development and protection projects[39].

- **What legal rights does the forest manager/contractor have in your country**?

No particular rules referring to forest managers/contractors have been identified in the national legislation.

- Is **there a requirement of a forest management plan**? Are there detailed prescriptions on that?

No particular rules referring to forest managers/contractors have been identified in the national legislation.

- Is there an **obligation to register the responsibility** of forest manager/contractor?
    i. Is registration based on product income?
    ii. Is there a registration fee?

No particular rules referring to forest managers/contractors have been identified in the national legislation.

- Is there a **tax imposed on the forest manager**? Is it based on income or hectares?

No particular rules referring to forest managers/contractors have been identified in the national legislation.

[39] Law 3208/2008, Official Government Gazette, A' 303/24.12.2003.

5. Forest Management plans

- Are forest management plans required in the legislation of your country?

  ☒ Yes

  ☐ No

  Specify where and the conditions as well as the amount of forest land with plans

Articles 63 and 64 of the Forest Code (Legislative Decree 86/1969):

- Article 63 provides that the management of public and private forests in Greece aims to preserve and conserve forests while ensuring sustainable benefits. It is based on forestry or forest management plans (permanent or temporary), management reports, logging tables and forest police provisions. Harvesting rights for livestock farmers in allocated forest areas, as governed by agricultural legislation, remain valid only until the expiration of the relevant management studies or logging tables.
- Article 64 provides that forest management plans and reports in Greece are approved, revised or amended by the Ministry of Agriculture, based on the opinion of the Technical Forestry Council. Permanent forestry plans are valid for ten years, while temporary plans and reports are valid for five to ten years. Permanent plans can only be revised during their validity if exceptional events like natural disasters or fires occur, as confirmed by a report from the regional forest director. Temporary plans and reports can be amended if their implementation proves harmful to the forest, or if errors are found, with confirmation from the regional forest director. They can also be revised into permanent plans after five years or for other reasons specified by decree.

No information regarding the amount of forest land with plans was identified.

- Are there other type of plans required such as:

  ☐ Technical Plan

  ☐ Financial Plan

  ☐ Exploitation Plan

  ☐ Fire prevention Plan

  ☐ Hunting Plan

No other type of plans were identified.

- Please indicate the **minimum size of forest requiring a forest management plan**?

The minimum size requirement for a forest to require a forest management plan is not explicitly stated in Greek forestry laws. However, generally, all public and private forests, regardless of size, may fall under management requirements to achieve conservation objectives as per Article 63 of the Forest Code (Legislative Decree 86/1969)[40] and Law 3208/2003[41].

[40] Legislative Decree No 86 (Forest Code), Official Government Gazette, A' 7/18.01.1969.

[41] Law 3208/2008, Official Government Gazette, A' 303/24.12.2003.

- On **which legal basis are they required? Are they legally binding or only guidelines**?

According to Article 63 of the Forest Code (Legislative Decree 86/1969), the management of public or non-public forests, in order to achieve forestry objectives and to ensure the conservation and maintenance of forests is based on (a) forestry or management plans (permanent or temporary), (b) forestry or management reports, (c) logging schedules and (d) forest police regulations[42].

Pursuant to Article 2(1) of Law 3208/2003, when planning the management and exploitation of forest ecosystems, by preparing the forestry plans provided for in Article 63 of the Forest Code (Legislative Decree 86/1969), special measures are taken to ensure, as far as possible, the protection of the landscape and the preservation of biodiversity. Forestry actions and practices, such as the selection of forest species in any afforestation or reforestation, methods of management, silvicultural handling and harvesting of wood and general interventions in forest ecosystems, shall be designed in such a way as to ensure the protection of habitats for flora and fauna species and the conservation of biodiversity[43].

The forest management plan is mainly a technical report (thus not legally binding) focusing on sustainable timber yield without taking into account consideration the non-timber products and services of the forest resource[44].

- **Who has the responsibility for the implementation of forest management plans**? Please include national, regional, and local levels as appropriate. Please distinguish between state and private ownership. Please distinguish between different protection status.

The forest management plans are drawn up by the Forestry Service for most state forests or by freelance foresters for private, communal and, in some cases, state forests and approved by the regional Forest Directorates. The Forestry Service has the entire responsibility for the management of forests and forested lands under its ownership, plus the responsibility of examining and approving the management plans for private owner forests. It is imperative that those management plans incorporate all environmental, ecological, socio-economic and productive conditions for the forest under consideration[45]. For private forests, the responsibility for the implementation of forest management plans lies with the forest owners, who are required to manage their forests according to the approved plans.

- Are forest **management plans being enforced**?

No particular information on the enforcement of forest management plans were identified.

[42] Legislative Decree No 86 (Forest Code), Official Government Gazette, A' 7/18.01.1969.
[43] Law 3208/2008, Official Government Gazette, A' 303/24.12.2003.
[44] Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report.
[45] Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report.

- Is there an obligation to maintain a **Forest Book** (linked or related to the Farm Book of the Common Agricultural Policy (CAP)?

There is a Forest Book in Greece but it does not seem linked or related to the Farm Book of the CAP, since its main data are not related to the insights on the economic aspects of forests. For the sake of completeness, it is described below.

> Pursuant to Article 3 of Law 3208/2003, the Forestry Book or Registry outlines the process for establishing a Forestry Registry in Greece. Within five months of the ratification of the forestry map for a Regional Unit, the Forestry Registry will be drafted and maintained by the Forest Mapping Department of the relevant Forestry Directorate, both in a physical book and electronic format. The drafting tasks can be delegated to private forestry study offices under the supervision of the Forestry Directorate, while the General Directorate for Development and Protection of Forests and Agricultural Environment oversees the registry's preparation, maintenance and technical specifications.
>
> Each entry in the registry will include details such as the forest code, name, approval decision number, area size, boundary descriptions, vegetation characteristics and other identifying elements, along with a special folder containing copies of relevant documents. For forests under exploitation, additional information regarding forest type, main species, total area and ownership status will be recorded. Areas not under management will be categorised by geographical unit, detailing vegetation type, density, area and use.
>
> A copy of the registry and any modifications must be sent to the Directorate of Forest Works and Infrastructure for registration in the Forest Land Information Database, with guidelines set by the Ministry of Environment and Energy. The Ministry of Agriculture will also establish procedures for the registry's creation and maintenance within two months.
>
> Until the registry is operational, a local Forestry Committee will classify areas on the forestry map, consisting of the head of the relevant Forestry Directorate and other forestry professionals. Additionally, seven Technical Forestry Committees will address appeals against local Forestry Committee decisions, composed of relevant department heads and managed by the Secretary-General of Forests. Decisions made by these committees will be used as evidence for preparing the Forestry Registry[46].

- **How often do forest management plans need to be updated**? Who is responsible for the update?

Pursuant to Article 64(1) of the Forest Code (Legislative Decree 86/1969), forestry plans and reports shall be approved, revised or amended by the Ministry of Agriculture after obtaining the opinion of the Technical Forestry Council and shall be valid for a period of ten years in the case of permanent forestry plans and for a period of five to ten years in the case of temporary forestry plans and reports[47].

[46] Law 3208/2008, Official Government Gazette, A' 303/24.12.2003.

[47] Legislative Decree No 86 (Forest Code), Official Government Gazette, A' 7/18.01.1969.

- Are specific mechanisms put in place to guarantee that national legislation is in line with European guidelines and **criteria on forest management plans** (i.e. Natura 2000 Forest Management Plans?

Pursuant to Article 45(15) of Law 998/1979, the provisions of the law concerning interventions in:

- forests,
- forest areas,
- grassland located on semi-mountainous, mountainous and rough terrain and constituting natural ecosystems consisting of woody, herbaceous or other native vegetation or of forest vegetation that does not constitute a forest community and
- rocky or stony areas of semi-mountainous, mountainous and rough terrain

located within the protection areas of Law No. 1650/1986 and Law 3028/2002, shall be carried out if provided for by the special protection regime of the aforementioned areas and subject to compliance with the more specific terms and conditions thereof. In particular, the implementation of the above interventions in the protected areas of the Natura network is permitted if they are in accordance with the relevant provisions of the specific presidential decrees and ministerial decisions on protection. In the absence of the aforementioned regulatory acts, the procedure of Article 10 of Law 4014/2012 shall apply[48]. Also, the tourist facilities, business parks, oil storage tanks with the necessary pipelines, educational institutions with their accompanying facilities and hospitals, treatment centres and facilities of the Regional Health and Welfare Systems, provided for in the provisions of this Chapter, are carried out in the above areas in accordance with the directions of the above-mentioned legislation.

- Are there any specific requirements for the **forest management plans** in terms of content, structure or criteria? If yes, please elaborate.

No particular requirements are introduced in the national legislation for the forest management plans.

In practice, the basic rules that apply to every management plan are based on the six criteria and indicators for the sustainable forest management[49]:

- Criterion 1: maintenance and appropriate enhancement of forest resources and their contribution to global carbon cycles.
- Criterion 2: maintenance of forest ecosystem health and vitality.
- Criterion 3: maintenance and encouragement of productive functions of forests.
- Criterion 4: maintenance, conservation and appropriate enhancement of biological diversity of forest ecosystems.

[48] Article 10 of Law 4014/2012, Official Government Gazette, A' 209/21.9.2011 regulates the Environmental authorisation procedure for projects and activities in areas included in the Natura 2000 network.

[49] Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report.

- Criterion 5: maintenance, conservation and appropriate enhancement of protective functions in forest management (soil and water).
- Criterion 6: maintenance of other socioeconomic functions and conditions.

- Are there any **supporting mechanism for the management plans**? If yes, please elaborate.

Funding, at both EU and national level, could be identified as supporting mechanisms for the management plans.

For instance, the Government's Strategic Projects Committee has awarded new projects worth €4.3 billion to the Project Preparation Facility of the Public Private Property Development Fund. One of these projects focuses on forest ecosystem management studies. The project concerns the integrated management and exploitation of the country's forest ecosystems according to their potential, through the preparation of Forest Studies.

This project organises forestry for more effective protection, maintenance and development of forests and perennial harvesting. The data of the Forestry Studies will be entered into a Single Database from which immediate and reliable conclusions can be drawn for the management of each forest in Greece. With the adoption of artificial intelligence and remote sensing technologies, it will be possible to efficiently process large volumes of data with increased accuracy and speed.

The Single Database will be interconnected with the Natura protected areas management framework, with the fire plans and Anti Nero projects, with the Grazing Management Plans under preparation and with the Forest Inventory and Monitoring System. In the future it will be linked to National Database Information Systems, but also to the River Basin Management Plans and Flood Risk Management Plans under revision.

The total project budget is estimated at EUR 15 000 000,00 and funding is secured from the Green Fund. The project is expected to start in the fourth quarter of 2024 and to be completed by the first quarter of 2026[50].

- Are **there impact assessment required** in your country in relation to the adoption of the forest management plans? What mechanisms are in place in your country to ensure that forest management plans are developed to ensure sustainable forest management practices? If yes, please elaborate.

Pursuant to Article 2(1) of Law 3208/2003, when planning the management and exploitation of forest ecosystems, by preparing the forestry plans provided for in Article 63 of the Forest Code (Legislative Decree 86/1969), **special measures** are taken to ensure, as far as possible, the protection of the landscape and the **preservation of biodiversity**. Forestry actions and practices, such as the selection of forest species in any afforestation or reforestation, methods of management, silvicultural handling and harvesting of wood and general interventions in forest

[50] HuffPost, 2024, The creation of an Integrated Forest Management System is progressing.

ecosystems, shall be designed in such a way as to ensure the protection of habitats for flora and fauna species and the conservation of biodiversity[51].

- Are the **Natura 2000 sites plans already implemented and well-coordinated or integrated** with forest management plans? Are traditional forest activities recognized in those plans? Are there guidelines for small forest owners and managers on what they can and can't do?

59% of Greek forests are included in areas of the Natura 2000 network[52]. However, Greek forests are not only protected as part of the Natura 2000 network, but also in the country's National Parks and other types of protected areas based on national legislation.

Besides the measures mentioned in the question above related to the preservation of biodiversity, there is no particular indication or provision ensuring that Natura 2000 sites plans are already implemented and well-coordinated or integrated with forest management plans.

The forest management plan is mainly a technical report focusing on sustainable timber yield without taking into account consideration the non-timber products and services of the forest resource[53].

No particular guidelines for small forest owners and managers could be identified.

6. Sustainable forest management.

6.1. Sustainable forest management definition and forestry practices

- Is sustainable forest **management (SFM) defined in your country**?

  ☒ Yes

  ☐ No

  SFM is the use of forest ecosystems in such a way and at such a rate as to allow the conservation of their biodiversity, their regeneration capacity, their vitality, and their ability to provide ecological, economic and social services in the present and in the future, at local, national and global level, without causing damage to other ecosystems (Article 4 of the National Forest Strategy).

- Does the definition of **SFM include specific objectives**?

  ☒ Yes

  ☐ No

  Based on the definition above:

  - Preserve the biodiversity of forests
  - Ensure the regeneration capacity of forests

[51] Law 3208/2008, Official Government Gazette, A' 303/24.12.2003.

[52] Ministry of Environment and Energy, Training Seminar, Innovative financing of forest management and restoration in Natura 2000 sites, 2019.

[53] Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report.

- Preserve the vitality of forests
- Ensure the ability of forests to provide ecological, economic and social services in the present and in the future, at local, national and global level, without causing damage to other ecosystems.

- Does your country have specific guidelines **on Sustainable Forest Management**? If yes, are those mentioned in the legislation?

  ☐ Yes, they can be found here:
  ☒ No
  ☐ Other sources defining or implementing Sustainable Forest Management

- Does your country have a **Forest Strategy and/or Forest Management Policy** setting policy priorities that implement a SFM approach?

  ☒ Yes, they can be found here: National Forest Strategy 2018-2038[54]
  ☐ No
  ☐ Other sources setting the Forest strategy/policy

For additional information on the National Forest Strategy 2018-2038 please refer to section 1.3.

- **Which requirements/obligations** result from the legally binding requirement for SFM?
  1. For forest owners
  2. For forest managers

The National Forest Strategy[55] is legally established with a Ministerial Decision and it is implemented through the Forest Action Plan. The First Forest Action Plan for the period 2019-2021 was established with a Ministerial Decision. The National Forest Strategy provides a list of indicators to monitor implementation of its horizontal and vertical axes. No particular requirements/obligations are directly addressed to forest owners or managers.

- Are **specific criteria and/or indicators** to determine whether SFM is being achieved? Where are they described (see table below)?

Yes, indicators are defined for each of the 3 horizontal and 4 vertical axes of the National Forest Strategy, to monitor implementation.

Regarding the 1st horizontal axis on forest governance, the following indicators are set:

- Number and extent of implementation of new technologies and assessment of their efficiency and new needs per five years.
- Number and members of new cooperation networks of different actors (e.g. FP Management Bodies, voluntary organisations, etc.).

[54] Ministry of Environment and Energy, National Forest Strategy 2018-2038.
[55] Ministry of Environment and Energy, National Forest Strategy 2018-2038.

- Adequate staffing of the organisational units with scientific, administrative and technical staff in accordance with their organisational charts.
- Staffing of the Forestry Service with new specialisations (e.g. lawyers, surveyors, biologists, geologists, etc.) in order to cover more fully the new forestry subjects.
- Appropriate use of existing staff based on their specialisation, training and skills.
- Clarification and elimination of overlapping responsibilities between the services.
- Establishment and further implementation of procedures for cooperation between different structures.
- Degree of implementation of the new standards for the preparation of Management Plans (e.g. forestry and other forest management studies, grazing management plans, single fire protection plans) in relation to all managed forest ecosystems and in relation to all forest ecosystems.
- Creation and maintenance of web portals and geospatial databases (annual number of updates, traffic).

Regarding the 2nd horizontal axis on inventory and monitoring, the following indicators are set:

- Implementation of an inventory within the first five years (YES/NO).
- Establishment and maintenance of a relevant open database (annual number of updates, traffic).
- Number of monitoring reports per five years.
- Ratio of exceptional versus regular reports per decade.
- Number of variables measured against those proposed in the NAP (percentage) per decade.
- Number of variables used to meet the country's international commitments (number) per decade.
- Percentage of forest maps validated on the area of all forest maps of all ecosystems (within the first five years).
- Percentage of forest inventory development on the area of forest ecosystems included in forest maps.
- Number of forest ecosystems with a management plan in progress (active) compared to forest ecosystems without a management plan.

Regarding the 3rd horizontal axis on research and innovation, the following indicators are set:

- Establishment and operation of a Research, Innovation and Training Structure: possibility of immediate implementation, 1st 5 years: YES/NO.
- Systematic training of Forestry Agency staff in research and innovation. Indicator 1=number of INEP or other recognised institutions training seminars/number of participants/number of participants with relevant tasks (2nd 5 years) Success: >=2 programmes/5 years, >=20 participants, >=5 in relevant position. Indicator 2=number of postgraduate programmes with a main or core focus on international forest policy and related international mechanisms. Success:>1/year with >=5 MSc students.

- Number of newsletters, press releases and media publications of material related to forest research and information for services, relevant stakeholders and the general public.
- Establishment of open licences and patents, exploitation of innovation products.
- Areas of application of innovative management and number of production of innovative products.
- Number of researchers per organisation.
- Number of publications per organisation and per NSRF thematic axis.
- Number of research projects to which the regional Forestry Services contribute.

Regarding the 1st vertical axis on forest economy, the following indicators are set:

- All indicators need to be monitored (annual change).
- Change in the contribution of forestry to the country's GDP (in absolute values - € and percentage - %).
- Number of institutional interventions (to integrate forestry sectors into GDP)
- activities - procedures for recording forest products and services produced - institutional framework for the integration of traditional or non-traditional activities with market value into the economic cycle).
- Quantities of wood products produced by category.
- Quantities of non-wood products produced by type.
- Quantities of biomass produced for energy by product category.
- Height of harvest and annual increment of timber producing forests.
- Number and area of forest ecosystems certified for sustainable management.
- Quantities of certified reproductive-planting material.
- Quantities of certified forest products.
- Area of reforestation and afforestation - restored forest ecosystems - utilized forested fields - agroforestry.
- Number and capacity of enterprises in the forest area by thematic axis and in relation to the carrying capacity of forest ecosystems.
- Number of education and training programmes for forestry workers - Number of forestry workers by employment category.

Regarding the 2nd vertical axis on climate change, the following indicators are set:

- Number of approved Regional Climate Change Adaptation Plans with vulnerability analysis for forest ecosystems.
- Impacts on forest ecosystems (assessment of changes in area of mortality, health status, changes in biodiversity indicators, etc.).
- Assessment of potential climate change impacts for different climatic conditions

- Potential impacts of climate change for different climate change projections, risk assessment and vulnerability assessment of forest ecosystems.
- Changes in the degree of fragmentation of forest ecosystems.
- Amount of carbon sequestered in forest ecosystems.
- Changes in carbon balance in the forest production and utilisation chain of wood and biomass.
- Estimation of current and future removals/emissions from the implementation of policies and measures in the field of land use, land use change and forestry.
- Number of new measures and actions per year related to the land use, land use change and forestry sector.
- Established mechanisms for cooperation between government agencies and cooperation between government agencies and social partners for cooperation on a voluntary basis.

Regarding the 3rd vertical axis on forest ecosystems and optimisation of ecosystem services, the following indicators are set:

- Development of road maps at national, regional and local level.
- Updating the technical specifications for the preparation of fire protection plans for forests and forest ecosystems.
- Creation and maintenance of a relevant database.
- Annual reporting by the Protection Offices of the local Forestry Services on prevention measures (emphasis on forest ecosystem management).
- Comprehensive report on forest fire prevention measures of the Coordinating Office for Protection and its publication.
- Annual reports on the number, extent and response to natural and man-made disasters (emphasis on forest fires), as well as the planning and evaluation of the effectiveness of prevention, together with proposals for improvement.
- Systematic recording and collection of violations (illegal logging, illegal erection of buildings - constructions, poaching, deforestation, etc.) from the electronic indexing and processing of entries in the regional Forestry Services' Incident Books in a single annual report by the central Forestry Service and evaluation of prevention actions.
- Annual publication of information leaflets/newsletters on forest ecosystem protection issues.
- Number of information workshops held annually on protection, promotion and education issues, as well as other communication activities with citizens.
- Extent and number of autopsies for on-site assessment of the post-fire situation after fires and restoration/reforestation reports/studies.
- Specifications of resilient and adapted settlements to forest fires in the immediate priority areas.

Regarding the 4th vertical axis on International and European Policies, the following indicators are set:

- Annual number of publications - reports in international media - participation in communication networks (e.g. Forest Communicators etc. number and type of actions of the unit, annual report of its actions].
- Inventory and five-yearly reports on the country's activities in the international arena.
- Creation and institutionalisation of a web portal on the international and European dimension of forest ecosystems, annual number of updates, number of visitors to this portal.
- Number of training seminars organised by European bodies, the Institute for Training (INEP) or other recognised bodies / number of participants / number of participants with relevant tasks.
- Number of postgraduate programmes focusing on international forest policy and related international mechanisms.

- Are some **forest managers implementing sustainable forest management practices voluntarily**? If yes, how are these voluntary management practices taking place? Through citizen initiatives, local initiatives, or other ways? Please explain how forest managers ensure that forest management practices are sustainable.

N/A

- Which mechanisms are put in place to support the implementation of SFM? Which measures are in place to monitor implementation of the SFM?

Beyond the indicators set out in both the National Forest Strategy and the First Forest Action Plan, there is limited information on the enforcement of these indicators or a detailed progress report on the 2019-2021 Action Plan's implementation. Nothing specified was raised through interviews either[56].

- Which forest management practices are required or prohibited by law in your forest/country? Please check below the proposed forest management practices and add supplementary ones if missing (Please include explanation of the legal requirements of the relevant techniques).

  ☐ Closer to nature silviculture practices

  ☐ Clear-cutting

  ☐ Shelterwood system

  ☒ Selective logging – According to Article 63 of the Forest Code (Legislative Decree 86/1969), the management of public or non-public forests, in order to achieve forestry objectives and to ensure the conservation and maintenance of forests is based, inter alia, on logging schedules[57].

  ☒ Afforestation and reforestation to enlarge forest areas – The forestry legislation provides that the forest owner must tolerate the interference of the competent state authorities in their forest area on the one hand and on the other hand, they must take the

[56] Interview with Forest Owner Association of Greece, 22.01.2025.

[57] Legislative Decree No 86 (Forest Code), Official Government Gazette, A' 7/18.01.1969.

actions required by law for the conservation of forest wealth, including the carrying out of regeneration and reduction felling or reforestation (a. 62(4) of the Forest Code).

☐ Controlled burn

☐ Mandatory salvage logging

☒ Other .....Reforestation of burned forest – The forestry legislation provides that the forest owner must tolerate the interference of the competent state authorities in their forest area on the one hand and on the other hand, they must take the actions required by law for the conservation of forest wealth, including the guarding and protection of private forest in case of fire (Article 18 par. 1 and 33 of Law 998/1979, Article 183 of the Forest Code) and the reforestation of destroyed private or forest property (Article 42 par. 2 of Law 998/1979).

- Are there limitations on the management models to be applied, like clearcuttings or their sizes? **Is there a ban on clear cutting linked to SFM?**

Besides what has been mentioned under Section 4, no such limitations linked to SFM were identified.

- Is there a **defined/legal target for forest land to be managed for conservation and species protection objectives in your country or region**?

No such target was identified in the national legislation.

- Are there **forest owner obligations** related to **forest restoration** after harvest?

No such obligations were identified in the national legislation.

6.2. "Closer-to-nature" guidelines and practices

(This section relates to the Commission Guidelines on Closer to nature forest management but also Commission guidance on payment schemes for forest ecosystem services both aiming to provide information and guidance for sustainable forest management)

- Has your country incorporated the **newly published Commission guidelines** in their legal or regulatory framework?

No reference was found to the term closer-to-nature in the Greek forestry framework.

- Has your country **recognized under law/regulatory measure a closer-to-nature approach** in forest management? If yes please provide the source where this is explained and elaborate below.

☐ Yes: in the Strategy that can be found here: .....

☒ No (however, please see below)

Several elements of closer-to-nature can be found in the objectives and direction actions of the National Forest Strategy 2018-2038. For instance, the objectives related to the Mediterranean region, as addressed also in the Commission Guidelines on Closer-to-Nature Forest Management. However, no reference as such is found to the term "closer-to-nature" in the Greek forestry framework.

- Does your country have legislation/measures setting specific biodiversity targets/management objectives for sustainable forest management at a national or regional level?

  ☒ Yes, at national level – they can be found here: National Strategy and Action Plan on Biodiversity[58] and National Forest Strategy[59].

  ☐ Yes, at regional level – they can be found here: .....

  ☐ No

  Please describe them and elaborate:

The **National Strategy and Action Plan on Biodiversity 2014 – 2029** refers to forests and forest protection in several of each objectives, in particular the assessment and conservation of forest genetic resources (Objective 4 on Conservation of genetic resources of Greece), the integration of the biodiversity dimension in sectoral policies including forestry (Objective 5 on Synergies of sectoral policies for biodiversity conservation) and the role of forests in carbon sequestration and reduction of GHG (Objective 7 on impacts of climate change on biodiversity)[60].

The **National Forest Strategy 2018-2038** which aims to move Greek forestry towards a model of multifunctional Mediterranean forestry emphasis the role of Mediterranean forests as unique in biodiversity in terms of genetic resources, species, ecosystems and landscape[61].

- Under horizontal axis 2 on inventories and monitoring, the objective is the creation of a national forest ecosystem inventory that monitors also variables related to biodiversity.
- Similarly, the horizontal axis 3 on research and innovation should among others contribute also to biodiversity conservation.
- Under the vertical axis 2 on climate change, one of the defined actions is to maintain the extent and quality of forest ecosystems, reducing fragmentation and improving their structure which among others leads to the conservation of biodiversity and habitats. The defined monitoring indicators on impacts on forest ecosystems include changes in biodiversity indicators.
- Under vertical axis 3 on forest protection and ecosystem services, one of the two main objectives is the management of forest ecosystems to conserve them and halt the loss of biodiversity. The defined actions include appropriate management practices and measures to enhance and conserve biodiversity[62].

[58] Ministry of Environment and Energy, National Strategy and Action Plan on Biodiversity 2014-2029.

[59] Ministry of Environment and Energy, National Forest Strategy 2018-2038.

[60] Ministry of Environment and Energy, 2014, National Biodiversity Strategy.

[61] Ministry of Environment and Energy, National Forest Strategy 2018-2038.

[62] Ministry of Environment and Energy, National Forest Strategy 2018-2038.

6.3. Climate change and Forest carbon absorption

- Does your country have legislation/measures setting specific climate change targets or objectives for sustainable forest management at a national or regional level?

The key objectives of the National Forest Strategy 2018-2038[63] for Greece include enhancing forest resilience to climate change, promoting biodiversity and improving forest governance. The first Forest Action Plan that was introduced under the National Forest Strategy was valid for the period 2019-2021. As of now, there has not been a new Forest Action Plan introduced in Greece following the previous one.

[63] Ministry of Environment and Energy, National Forest Strategy 2018-2038.

7. Forest land market

NOTE: The key objective is to identify and present information on the basic legal framework regulating market of forest land and inheritance processes.

- Are there specific legal requirements or limitations when selling and buying forest land?

Before buying or selling forest land, it is crucial to verify the land's classification through the Hellenic Cadastre, which has mapped forested areas across the country. This ensures that the land is indeed classified as forest land and adheres to the protections associated with it. Forest lands are protected under the Greek Constitution (Article 24), which mandates their conservation and restricts certain development activities.

Any transaction involving forest land must comply with environmental laws, including the Forest Code and Law 998/1979, which restrict the conversion of forest land for non-forest uses. For instance, even if ownership changes, the new owner cannot typically alter the forest status or clear the land for alternative uses without going through rigorous legal procedures that often require approval from environmental authorities.

Pursuant to Article 72(1) of Law 998/1979, in the case of private forests and woodlands in excess of fifty (50) acres, whose owners wish to transfer them to third parties by sale, the State shall have the right of preference on equal terms for their purchase.

Even after a legal purchase, forest land cannot be developed without adherence to conservation laws. This applies particularly to lands within Natura 2000 zones or other protected areas where environmental impact assessments are required before any significant alteration or development can take place.

- Are there **limitations to divide** the land by selling or inheritances?

There are no specific inheritance rules applied to forests in Greece[64].

Pursuant to Article 60(1) of the Forest Code (Legislative Decree 86/1969), the division of forest property, either by distribution between the undivided co-owners or tenants, or by sale or any other act, without the prior permission of the Ministry of Agriculture, is prohibited, under penalty of absolute nullity of the relevant legal transaction. The Ministry's authorisation shall be entered in the relevant notarial deed, in which it shall be mentioned[65].

- Are there institutions/**bodies providing information** related to the forest land market?

In Greece, information about the forest land market, land tenure and geospatial data is largely managed through the Hellenic Cadastre and its National Forest Map Program. The platform supports individuals or entities interested in making claims or retrieving detailed forest land information[66].

[64] Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report.
[65] Legislative Decree No 86 (Forest Code), Official Government Gazette, A' 7/18.01.1969.
[66] Ministry of Digital Governance, National Cadastre; Ministry of Digital Governance, National Cadastre: forest maps.

- Are there institutions/**bodies contributing to dynamize that market,** like forest land banks or advisory bodies (similar to the CAP advisory bodies) and others? Is there regular information on the amount of forest land transferred and the prices of transmissions? (Information on this market is usually missing)

No such bodies could be identified.

- Are there **regulations of forest land leasing**? Are they common with agricultural land or independent and with specific requirements?

There are no particular provisions on forest land leasing in the national legislation. However, Article 45 of Law 998/1979 can be considered relevant here since it regulates permitted interventions in forests and woodlands. Pursuant to Article 45 of Law 998/1979, changes to the purpose of forests and woodlands are strictly prohibited, in whole or in part, unless expressly permitted in Law 998/1979. Any intervention in forests, woodlands, public grasslands or rocky areas is considered an exceptional measure and requires prior approval. Approval must be obtained from the locally authorised Forest Policy Implementation Inspectorate under the Ministry of Environment and Energy. For interventions on private land by third parties, the written consent of the landowner must be submitted to the relevant forestry department. This submission is required before the issuance of an information act and, in all cases, prior to the beneficiary's occupation of the land.

- Are there obligations **and or access to insurances for forest land or forest activities**?

No relevant obligations could be identified in the national legislation.

- Are there specific regulations providing, **facilitating or limiting access to financial credits** for forest activities or mortgages on forest land?

Forestry funding are credits coming from the Ordinary Budget, the Investment Budget, the European Union and other sources. The State subsidises about 60% of the expenditure paid in non-state forestry for various forestry works. To be eligible for subsidy must present a study approved by the Forestry Service for the forestry work to be carried out, while beneficiaries receive the funding after the work has been finished[67].

Many forest areas have unclear ownership due to historical and legal complexities. This makes it difficult to use such land as collateral for loans or mortgages, as banks require clear title of ownership and definitive property boundaries, which are not always available for forest land.

[67] UNECE, National Report of Greece Forest policy.

8. Forest companies, Forest incentives and taxation.

Forest Companies

- Is there a **register of forest industries**? Is there a **register of forest contractors**?

In Greece, there is no specific register solely dedicated to forest industries or contractors. Instead, forest management and land registration fall under the broader framework of the Hellenic Cadastre, which encompasses all land properties, including forests[68]. The National Forest Map Program, initiated in 1998, serves as a significant tool for mapping forest areas, but it does not constitute a traditional registry for forest industries or contractors[69].

- Is there any specific **regulation on forest ownership, forest cooperatives or other types of forest companies or are they all regulated under the** Company Law?

Forest ownership and forest cooperatives in Greece are subject to specialised regulations beyond general company laws. Specifically, forest cooperatives, such as forest-worker cooperatives, operate under dedicated legislation: Law 4423/2016 establishes the framework for "Forest Cooperative Organisations", detailing their operational standards and governance separate from general corporate laws. This law is designed to support cooperatives in the forestry sector, allowing them to function with certain privileges and responsibilities not applicable under broader company legislation[70]. Agricultural cooperatives are similarly governed under a distinct framework, Law 4384/2016, which outlines unique regulations that apply to agricultural and forest cooperatives specifically[71].

As for private forest ownership, while there is no overarching cooperative law that fully harmonises cooperative activities across different sectors in Greece, the Constitution (Article 24) mandates protection for forested lands, limiting the types of ownership changes and development allowed. Forest lands also fall under regulations that govern usage and transfer, which must often be approved by the Ministry of Agriculture to ensure conservation priorities are met, especially since forests play a central role in Greece's natural heritage and environmental strategy.

For any specific aspects of commercial operations and activities, however, forest cooperatives may still be subject to relevant sections of Greek Company Law when they engage in broader corporate activities, although they benefit from unique provisions under the cooperative-specific laws mentioned above.

[68] Ministry of Digital Governance, National Cadastre.

[69] Ministry of Digital Governance, National Cadastre: forest maps.

[70] Law 4423/2016, Official Government Gazette, A' 182/27.09.2016.

[71] Law 4384/2016, Official Government Gazette, A' 78/26.04.2016.

- Do **small forest owners have access to the status of forest companies**?

There is no explicit exclusion of forest owners from the status of forest companies. Therefore, we can conclude that small forest owners have access to the status of forest companies under the Greek legislation.

Forest incentives and taxation

As regards incentives, pursuant to Article 32(1) of Law 998/1979, to those who voluntarily or upon request participate in the extinguishing of forest fires and who have shown particular courage and efficiency in their work and have therefore contributed significantly to the extinguishing of the fire, an honorary diploma or a monetary prize or both shall be awarded.

No further incentives were identified in the national legislation.

- Are there **effective subsidies** for forest owners and managers to implement SFM? And/or to carry out biodiversity conservation measures? If it does exist, please compare the total amount paid at national level in the last 3 years with available information with the amount defined as necessary at the Prioritised Actions Framework.

Yes, there are effective subsidies that can be used to implement SFM by forest owners. The Rural Development in Greece is managed nationally through one Rural Development Programme (RDP), funded under the European Agricultural Fund for Rural Development (EAFRD) and national contributions. Some of these funds may be directed to SFM implementation.

Moreover, the Ministry of Environment and Energy is involved in three LIFE projects relevant to the protection of forests, including:

- Life ForestLife "Building cooperation, developing skills and sharing knowledge for Natura 2000 forests in Greece Building cooperation, developing skills and sharing knowledge for Natura 2000 forests in Greece" (LIFE14/GIE/GR000304),
- Life Bonelli eastMed "Conservation & Management of the Spirometer in the Eastern Mediterranean" (LIFE17 NAT/GR/000514),
- Life Grin "Promoting the Integration of Green Infrastructures in the Urban Web to Improve Climate Change Governance in Cities" (LIFE17GIC_GR_000029),

as explained on the relevant webpage of the Ministry.

No information could be found regarding the amount paid at the national level over the past three years.

- What taxes are applicable to Forest companies and forest owners?

Landowners, including forest landowners, pay the ENFIA tax, a property tax based on the property's assessed value. This tax includes a main tax and an additional tax on high-value properties. Property owners who hold land that is used for non-residential purposes, like forestry or business, may also incur other specific property-related taxes.

Moreover, pursuant to Articles 71 and 72 of Presidential Decree 30-11-1928/1928, the gross forestry income of sustainably or periodically managed non-public forests (private, communal, monastic, inter-family, etc.) is considered taxable if it results from the logging of all or part of the annual or periodic harvest of the amount determined for these forests by the logging tables, the temporary management reports, the permanent or temporary management plans, management programmes, etc. Taxable is also the gross profit. Also taxable is also the gross profit derived from the sale or withdrawal of forest products of private forests, resulting from accidental events (such as the destruction and uprooting of trees by snow, wind and other external causes and effects), from forest products from the burning of private forests and woodland, from the clearing of private forests and woodland and, in general, from all forest products logged, harvested and constructed from private forest land. The tax rate is set at 10% for gross forestry income derived from primary forestry products and 8% for gross forestry income derived from secondary forestry products[72].

[72] Presidential Decree 30-11-1928/1928, Official Government Gazette, A' 252/30.11.1928.

9. Enforcement: Forest control and penalties.

- Are there specific measures in place to enforce compliance with the legal requirements on forest management?

  Please list only the legislative measures including the responsible body that are specific to forest management requirements.

Chapter 8 of Law 998/1979 provides for:

9.1.1. Infringements relating to protective measures (Article 68)

9.1.2. Infringements relating to firefighting (Article 69)

9.1.3. Infringements of obligations relating to reforestation (Article 70)

9.1.4. Unauthorised change of use (Article 71).

Infringements relating to protective measures (Article 68)

Pursuant to Article 68 of Law 998/1979, individuals may face imprisonment for up to one year for obstructing forest photography or mapping, damaging protective works or signage, or failing to meet obligations as administrators of specific cooperatives. If these acts are committed negligently, the punishment is reduced to a maximum of six months imprisonment.

Violators of the rules regarding the passage of wheeled vehicles on the forest road network may receive imprisonment ranging from two to six months and an administrative fine between EUR 100 and 600. This fine is confirmed by a forester and collected through the Public Revenue Collection Code, with proceeds allocated to the Green Fund's Special Forestry Agency. Offenders may appeal the fine in an administrative court within sixty days of notification, but this appeal does not automatically suspend the fine's enforcement. However, a suspension may be granted under specific conditions.

Infringements relating to firefighting (Article 69)

Pursuant to Article 69 of Law 998/1979, anyone violating Article 23 (general prohibitions not specifically related to forest owners) faces imprisonment from two months to one year, which increases to a minimum of six months if the violation occurs in a designated dangerous area and at least two years if it leads to a fire in a forested area. Supervisors neglecting minors or individuals with impaired capacity who then cause a fire, as well as employers failing to ensure proper supervision near forest lands resulting in a fire, are also subject to imprisonment of up to one year. Article 23 violators may have their products, tools and materials confiscated and the operating license of any violating laboratory or technical complex may be revoked.

Those listed under Article 31 (obligation for holders of mechanical means, not specifically related to forest ownership) who refuse forest authority orders during a fire may be imprisoned for up to one year, as are mayors or community leaders who neglect to create these lists.

Infringements of obligations relating to reforestation (Article 70)

Under Article 70 of Law 998/1979, individuals who clear, deforest, or cultivate non-forest plants on land designated for reforestation, whether public or private, face a minimum of one year in prison and a fine of EUR 3 000 per 100 square meters destroyed. For destruction beyond one hectare, the fine increases to EUR 6 000 for each additional 100 square meters. Following a final conviction, an administrative fine is also issued by a forester within ten days. Additionally, anyone who damages or disrupts reforestation activities, forest plantations, nurseries, or hinders forestry officials, faces up to one year of imprisonment.

Unauthorised change of use (Article 71)

Under Article 70 of Law 998/1979, individuals who clear, deforest, or cultivate non-forest plants on land designated for reforestation, whether public or private, face a minimum of one year in prison and a fine of EUR 3 000 per 100 square meters destroyed. For destruction beyond one hectare, the fine increases to EUR 6 000 for each additional 100 square meters. Following a final conviction, an administrative fine is also issued by a forester within ten days. Additionally, anyone who damages or disrupts reforestation activities, forest plantations, nurseries, or hinders forestry officials, faces up to one year of imprisonment.

According to Article 71 of Law 998/1979, offenders who build or attempt to build within forests, reforestation areas, or public grasslands without authorisation face at least five years of imprisonment and a fine between EUR 20 000 and EUR 200 000. This includes contractors, subcontractors, builders and any third party assisting with construction. Workers and associates of these individuals who aid in such construction are subject to at least one year of imprisonment and a fine between EUR 2 000 and EUR 20 000. Those who unlawfully clear forest land, cultivate cleared land, or otherwise misuse forest land without proper approval face similar penalties and confiscation of any materials or products involved in the offense.

Furthermore, pursuant to Article 71 of Law 998/1979, buildings erected unlawfully cannot connect to essential services like water, electricity, or telecommunications, with violators facing a minimum of three months in prison and a fine between EUR 3 000 and EUR 30 000. Authorities must notify the prosecutor within two days of issuing a demolition order, with non-compliance considered disciplinary misconduct. Appeals may have suspensive effects as per Article 497 of the Code of Criminal Procedure. Further administrative fines apply to those who conduct road widening works without meeting legal obligations under Article 48 of Law 998/1979. Additionally, those failing to restore the natural landscape or forest vegetation, as required by Article 52 and enforced by the forestry authority, may be imprisoned for up to one year and fined between EUR 2 000 and EUR 20 000, as are those disregarding the obligations of Article 49 of Law 998/1979.

10. Conclusions

10.1. Legal or regulatory barriers for SFM

- What are the main legal and regulatory barriers and enablers affecting the implementation of SFM in your country?

The main legal and regulatory barriers to implementing SFM in Greece primarily derive from complex ownership and tenure laws and limited flexibility in forest land activities. In particular, complex and historic ownership structures, compounded by incomplete registration in the national cadastre, create legal uncertainties and make forest land management challenging for smaller stakeholders.

On the enabling side, Greece has established a legal framework that mandates reforestation, forest management plans and fire prevention measures, which support SFM principles. Financial incentives, though limited, are available for reforestation and forest conservation projects. Further, the National Forest Strategy (2018-2038) emphasises biodiversity and forest resilience to climate change, aligning with SFM goals. However, gaps remain, such as the need for stronger financial support for small forest owners, integration of closer-to-nature forestry practices and improved coordination among regional and national forestry authorities.

- Are there specific legal and regulatory barriers or challenges to implement a closer-to-nature approach in forest management in your country?

Implementing a closer-to-nature approach in forest management in Greece faces several legal and regulatory barriers. While the National Forest Strategy 2018-2038 emphasises biodiversity, resilience to climate change and sustainable forest practices, there is no specific reference to the "closer-to-nature" concept in Greek forestry legislation. This lack of explicit legal recognition limits formal guidance on implementing closer-to-nature principles.

Additionally, Greek forestry laws are imposing strict land use and activity limitations, which, while beneficial for general forest conservation, can hinder flexibility needed for closer-to-nature practices. For instance, restrictive policies on land use conversion and specific intervention approvals limit forest owners' ability to apply adaptable, ecosystem-based management techniques. Further, current forest management plans focus predominantly on timber yield rather than incorporating a balanced approach to forest biodiversity, soil health and other non-timber forest functions central to closer-to-nature practices.

In summary, while some foundational principles for closer-to-nature forestry exist in broader conservation policies, the absence of specific legal provisions, the strict regulatory framework and ownership complexities pose significant challenges to fully adopting a closer-to-nature approach in Greece's forest management.

- What are the main legal drivers for implementing a closer-to-nature approach in forest management for relevant actors?

The main legal drivers for implementing a closer-to-nature approach in forest management in Greece are grounded in the overarching principles of the National Forest Strategy 2018-2038, which emphasises biodiversity conservation, climate resilience and sustainable use of forest resources. Although closer-to-nature practices are not explicitly mentioned, certain aspects of the strategy align well with this approach. Specifically, the strategy's goals to protect and enhance biodiversity, reduce forest fragmentation and maintain forest ecosystem health encourage practices that resonate with closer-to-nature principles.

Greek law also mandates environmental protection measures under the Constitution, which restricts changes to forest land use and emphasises maintaining natural ecosystems. Furthermore, Laws 1650/1986 on environmental protection and 998/1979 on forest protection establish foundational guidelines that, while not directly promoting closer-to-nature forestry, indirectly encourage sustainable forest management by focusing on biodiversity conservation, limiting harmful interventions and mandating reforestation efforts.

Another driver is the inclusion of indicators in the National Forest Strategy to monitor the impacts of forest management on biodiversity and forest ecosystem resilience. This monitoring requirement encourages relevant actors, such as public forest authorities and private owners, to adopt management practices that prioritise ecosystem stability and biodiversity—a key aspect of closer-to-nature forestry.

For forests within Natura 2000 areas, Greek legislation requires alignment with conservation objectives for protected habitats, which naturally promotes management approaches favouring ecological balance and minimal intervention. This alignment, while not an explicit closer-to-nature mandate, provides a regulatory foundation for practices that can contribute to a closer-to-nature approach by prioritizing ecosystem health over intensive forestry activities.

In conclusion, although Greece lacks direct legal provisions for closer-to-nature forestry, existing biodiversity conservation laws, sustainable management mandates and the National Forest Strategy serve as indirect legal drivers encouraging practices aligned with a closer-to-nature approach.

10.2. Legal or regulatory gaps in national forest legislation

Please provide key conclusions based on the information referred to in previous sections.

Restrictive legal framework: Greece's forest management laws prioritise conservation and restrict changes to forest land use. This aligns with the Greek Constitution and various forestry laws, which emphasise protecting biodiversity and maintaining forest resources.

Gaps in closer-to-nature forestry: Although the National Forest Strategy 2018-2038 supports biodiversity and sustainable management, it lacks explicit guidelines or legal provisions for closer-to-nature forestry practices. The absence of specific recognition or structured policies for closer-to-nature methods poses challenges for those aiming to implement such practices comprehensively.

Complex ownership structure: A significant portion of Greece's forests remains under public ownership, with complex tenure and registration issues due to historical and legal reasons. This complexity complicates coordinated forest management and limits cohesive application of SFM principles across various ownership types.

Lack of financial support and incentives: Although some financial mechanisms exist, support for small forest owners remains limited. Enhanced financial incentives could encourage adoption of SFM and closer-to-nature practices, particularly for small owners who face economic constraints in managing their forest resources sustainably.

Challenges in enforcement and monitoring: While legal frameworks exist, the enforcement and monitoring mechanisms for SFM, especially for non-state forests, are relatively underdeveloped. Better-defined indicators, enforcement practices and progress assessments would strengthen adherence to sustainable practices and improve forest management outcomes.

National experts on forest legislation and references

- **Please provide the names and contacts of 3 to 5 experts in forest legislation in your country**,

Mr Ioannis Spanos – ispanos@fri.gr / ispanos1957@gmail.com - Director Researcher Forest Research Institute of Thessaloniki dpt. of Silviculture and Forest Ecology

Mr Panagiotis Platis – pplatis@fri.gr – Forest Research Institute

Mr Konstantinos Mantzanas - konman@for.auth.gr - Aristotle University of Thessaloniki (Department of Forestry and Natural Environment

Mr Thomas Papachristou – tpapachr@fri.gr - Forest Research Institute

Dr Theano Samara – theasam@fri.gr - Forest Research Institute

Mr Miltiadis Meliadis - mmelia@afs.edu.gr - American Farm School of Thessaloniki

Mr Theodorus N. Ikonomou - forecon.gr@gmail.com - Forest Owner Association of Greece

- Provide **key books or articles analysing the national and/or regional forest legislation** in your country, particularly if they compare it with other countries, if they analyse the effect in actual management of SFM.

Forest Land Ownership Change in Greece, COST Action FP1201 FACESMAP Country Report.

Paraschou, M., 2017, Ownership of privately owned forest land.

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Management and protection of private forests, 2021, https://dasarxeio.com/2021/09/05/101739/.

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Forest property, 2016, https://dasarxeio.com/2016/03/02/29041/.

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