



Greece

Population ¹	10,731,726
Area (km ²) ¹	131,960
GDP per capita (USD) ¹	20,316.57
TPES (Mtoe) ²	23.28
Energy intensity (toe/10 ³ 2010 USD) ²	0.09
CO ₂ emissions - energy (MtCO ₂) ³	63.21

Data from Orbis Crossborder Investment on energy projects and deals completed between 2015-2020⁴

Target industry	Number of projects and deals	Project/deal type	Project CapEx and deal value (million EUR)
Electric power generation, transmission and distribution	1 project 3 deals	1 new project 2 acquisition deals 1 minority stake deal	300m EUR total project CapEx 320m EUR total value of deals
Extraction of natural gas and crude petroleum	2 deals	minority stake deals	13m EUR total value of deals
Manufacture of refined petroleum products	1 project	new project	4m EUR total project CapEx

Sources:

1. The World Bank 2018
2. ©IEA, World energy balances, 2020, www.iea.org/data-and-statistics, webstore.iea.org/key-world-energy-statistics-2019
3. ©IEA 2020, CO₂ emissions from fuel combustion, www.iea.org/data-and-statistics, webstore.iea.org/key-world-energy-statistics-2019
4. Orbis Crossborder Investment (2020), Bureau Van Dijk. Greece is the destination country of the investment. Data represents the period 1 April 2015 - 1 April 2020. For more information see Annex II of this report.

Greece’s overall risk level against the assessed areas is **very low**.

Among the three risks assessed in EIRA, *discrimination between foreign and domestic investors* is lower compared to *unpredictable policy and regulatory change* and *breach of State obligations*.

Greece has a very good performance on three indicators, and a good performance on one indicator. *Regulatory environment and investment conditions* continues to be the highest-scoring indicator at 92 after increasing by two points. The country has improved its performance on *management of decision-making processes* from 75 to 90. It has maintained a very good score of 82 on the indicator *rule of law*. The score on *foresight of policy and regulatory change* has increased from 69 to 78.

On a more detailed level, Greece’s overall sub-indicator performance is very good. The highest-scoring sub-indicator continues to be *regulatory effectiveness* at 94, followed by *transparency* which has gone up from 75 to 92. On the sub-indicator *restrictions on FDI*, it has gained five more points compared to last year and improved its score from 85 to 90. The score on *institutional governance* has increased by 13 points and is now at 88. *Respect for property rights* is at 83, the same as in 2019, while the score on *robustness of policy goals and commitments* has increased from 75 to 81. *Management and settlement of investor-State disputes* is at 80. Its score on *communication of vision and policies* has improved from 63 to 75.

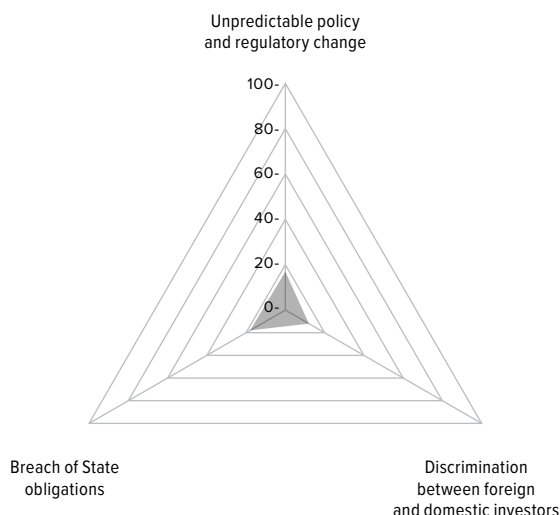
Greece provides attractive conditions to investors and is working in the right direction. Attention should be given to better communicating the country’s policies to investors.

YEAR-ON-YEAR COMPARISON

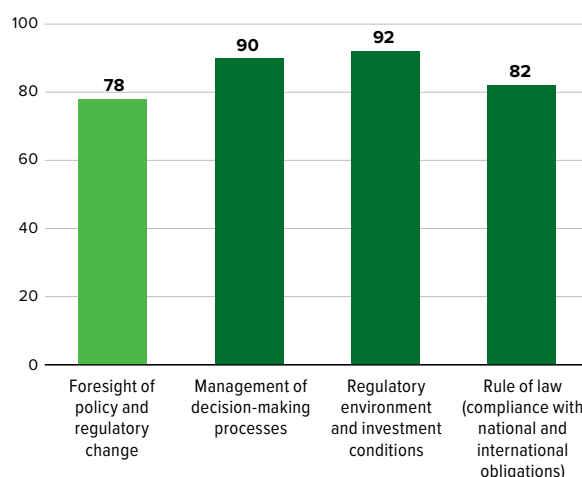
RISK AREAS	2018	2019	2020
Unpredictable policy and regulatory change	31	25	17
Discrimination between foreign and domestic investors	19	18	12
Breach of State obligations	23	18	18

INDICATORS	2018	2019	2020
Foresight of policy and regulatory change	54	69	78
Management of decision-making processes	75	75	90
Regulatory environment and investment conditions	90	90	92
Rule of law	77	82	82

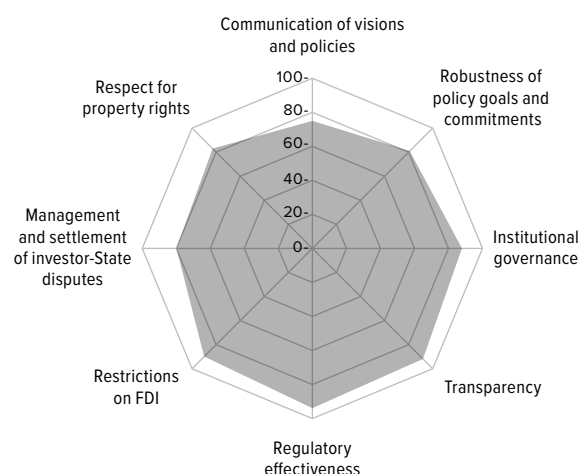
RISK LEVEL



INDICATOR PERFORMANCE



SUB-INDICATOR PERFORMANCE



Foresight of policy and regulatory change

QUICK FACTS

In December 2019, Greece adopted the National Energy and Climate Plan (NECP) 2030 and the Long-Term Strategy for 2050.

The National Energy Efficiency Action Plan was adopted in 2017 to implement the national energy efficiency improvement targets.

In 2016, Greece ratified the Paris Agreement as an EU Member State.

STRENGTHS

Taking account of the European Commission's recommendations, the Government revised the NECP 2030 and adopted the final text. The NECP contains well-articulated and clear goals. It sets an ambitious target for 2030 of at least 42% GHG emission reduction compared to 1990, demonstrating Greece's commitment to protect the environment and address climate change. One of its most important targets is to shut down all the lignite-fired thermal power plants currently in operation by 2023, and put a complete end to the use of lignite for power generation in Greece by 2028. The revised objectives of the NECP also provide for higher renewable energy penetration shares in gross and final energy consumption, and greater energy efficiency improvement that translates into lower forecasts of final energy consumption. Another key priority is to increase energy security by reducing imports and developing domestic energy sources. The Long-Term Strategy for 2050 sets a roadmap on climate and energy issues in the context of the country's participation in the collective goal of a climate-neutral EU by 2050.

The NECP envisages a single governance framework to monitor and assess policy measures in a cohesive manner. A fundamental component of the single governance framework is the integrated monitoring mechanism for the NECP targets, as well as the impact assessment of each policy measure through the use of relevant critical performance indicators. The Government has established the Inter-Ministerial Committee for Energy and Climate to develop and implement the governance framework for the monitoring mechanism.

AREAS FOR IMPROVEMENT

Following the adoption of the NECP, the Government should develop, as soon as possible, detailed action plans which will guide the implementation of the set goals. The achievement of Greece's ambitious targets within the foreseen timeframe will largely depend on the swift reaction of the concerned authorities, and their ability to set a regulatory and statutory framework to support the implementation of the policy measures.

Management of decision-making processes

QUICK FACTS

The Ministry of Environment and Energy leads the formulation of energy policies.

The General Secretariat for Private Investments and Public-Private Partnerships is the one-stop-shop which facilitates the licencing procedure for strategic investments.

Greece enacted Law no. 3861/2010 on the mandatory online publication of all laws and regulations.

STRENGTHS

Coordination between governmental and institutional bodies plays a critical role in the country's governance framework. The Inter-Ministerial Committee for Energy and Climate addresses issues relevant to the Long-Term Strategy for 2050. It comprises officials from multiple ministries and public authorities. Among other things, it formulates the national priorities and guidelines for Greece's energy planning, promotes proposals for energy policies and ensures consultation and coordination at the national and regional level. The Government has also set up an inter-ministerial committee to develop the Just Development Transition Master Plan which will serve as a roadmap towards the post-lignite era. The Government is taking various measures to digitalise public administration and facilitate transactions between the State and businesses. For instance, it has established the Ministry of Digital Governance and adopted Law no. 4608/2019 on the Attraction of Strategic Investments to introduce a safer and more transparent fast-track licencing procedure.

Law no. 4622/2019 on Organisation, Operation and Transparency of Government, Governmental Institutions and Central Public Administration was adopted in August 2019. It includes provisions for improving the legislative process and the impact assessment carried out during the law-proposal preparation phase. According to the Law, the Secretariat General for Legislative and Parliamentary Affairs is responsible for the quality assurance and subsequent approvals of draft laws before their submission to the Parliament. The Secretariat ensures the timely publication of regulatory acts and use of rules of good law-making across the central administration. Under the Law, public consultation is an integral part of the legislative process.

AREAS FOR IMPROVEMENT

While all legislation is centralised in the Official Gazette, it is challenging to trace law amendments, and users must rely on private legal databases to follow successive changes. To fulfil its mission, the Official Gazette should provide information on the relationship between different pieces of legislation by linking basic acts and related amendments, corrigenda and repeals, or by establishing a nexus between the consolidated resources and the changes they incorporate. This approach will allow users to identify the latest version of laws, and it will facilitate access to updated and accurate information.

Regulatory environment and investment conditions

QUICK FACTS

The Regulatory Authority for Energy of the Hellenic Republic (RAE) regulates the electricity and natural gas sub-sectors and monitors the oil products market.

The Hellenic Hydrocarbon Resources Management SA (HHRM) grants the rights to prospecting, exploration and exploitation of hydrocarbons.

Law no. 2289/1995 on Prospecting, Exploration and Production of Hydrocarbons provides the framework for licencing in the upstream sector in line with European standards.

STRENGTHS

Developing the new electricity market model, and making it fully operational, is a top priority for Greece in the immediate future. RAE has a critical role to play in the prompt delivery of this priority. In this context, the Government has adopted Law no. 4643/2019 to strengthen RAE's powers to control and monitor the energy market and to impose sanctions in case of breach of EU or national law. This Law includes provisions which address issues of corporate governance and financial viability of the Public Power Corporation (PPC). It also deals with the restructuring and privatisation of the Public Gas Company (DEPA). The Hellenic Energy Exchange, in cooperation with the Ministry of Environment and Energy, RAE and the Natural Gas Transmission System Operator (DESFA), is finalising a gas trading platform plan with the aim to start negotiations on the spot market by 2021. The gas trading platform will be operated and managed by the Hellenic Energy Exchange and will create the basis for Greece becoming a regional gas hub.

The Government is committed to supporting and encouraging foreign investment. Law no. 4608/2019 on the Attraction of Strategic Investments was adopted to establish a more attractive and effective framework for prospective investors. It offers a wide range of benefits which include tax incentives, spatial development incentives, and expenditure grants. The new framework aims to upgrade all the sectors of the economy and increasing employment opportunities through the establishment of investments. Moreover, capital transfer restrictions, imposed in 2015, were entirely removed as of September 2019 by Law no. 4624/2019.

AREAS FOR IMPROVEMENT

The Government should implement measures that will reduce RAE's consistently increasing workload on project licencing, especially for renewable energy projects. The application of a simplified, efficient and fast licencing process will allow RAE to manage its resources better and encourage the flow of foreign funds in the domestic market. A positive step in this direction was taken in May 2020, with the adoption of Law no. 4685 to modernise environmental legislation.

Rule of law

QUICK FACTS

Greece became a Contracting Party to the Energy Charter Treaty in 1997.

The Convention on the Settlement of Investment Disputes between States and Nationals of Other States was ratified by Greece in 1969.

Provisions against the expropriation of immovable property are stated in the Constitution and Law no. 2882/2001.

STRENGTHS

Law no. 4635/2019 introduces mandatory electronic filing and processing of legal documents by the administrative courts. It also gives parties to judicial proceedings remote access to case files. These new provisions, effective from January 2021, will increase the speed and efficiency of administrative justice. The new Law no. 4640/2019 on mediation abolishes previous legislation and extends the requirement of mandatory initial mediation to a broad category of civil and commercial law disputes of national and cross-border nature. It further harmonises Greek legislation with the provisions of Directive 2008/52/EC on Certain Aspects of Mediation in Civil and Commercial Matters.

Expropriation is permitted only upon the payment of effective compensation, within 18 months from the publication of a court decision regarding its determination. IP rights are protected through several laws and BITs to which Greece is a party. Additionally, the European Union Intellectual Property Office (EUIPO) protects the IP rights of businesses and innovators across the EU and beyond. The Greece-Kuwait BIT, which came into force in 2019, protects all types of investment from expropriation, including IP rights. In general, technology transfer is not restricted.

AREAS FOR IMPROVEMENT

While Greece is making efforts to accelerate judicial proceedings, it should make greater efforts to lower the domestic courts' caseload. For instance, mediation, currently regulated only for private civil and commercial cases, should also be encouraged in disputes involving public entities.

"Public interest" is defined on a case-by-case basis within the limits prescribed by the Supreme Administrative Court. A general definition of the term may be incorporated in the Expropriation Code (Law no. 2882/2001) to clarify its scope and application, and to create greater certainty. Additionally, Greece may consider widening the subject matter of the Expropriation Code, which now refers to real property, and include other types of property in line with the interpretation of the term under the Constitution.

IMPLEMENTATION STATUS



PROPOSED IN	EIRA AREAS FOR IMPROVEMENT	IMPLEMENTATION STATUS AS OF 1 APRIL 2020
Indicator 1		
	Finalise and adopt a national action plan to facilitate the implementation of the country's energy objectives.	Fully implemented. In January 2019, Greece finalised the National Energy and Climate Plan (NECP) 2030, which was revised and adopted in December of the same year.
2018	Set quantifiable short- and medium-term targets, as well as ultimate outcomes, for the country's energy priorities. There should be a timeframe and detailed actions to ensure the implementation of the targets.	Fully implemented. The NECP contains well-articulated and clear targets, such as the country's pledge to shut down by 2023 all lignite-fired thermal power plants and put a complete end to the use of lignite for power generation by 2028. It also sets an ambitious target for 2030 of at least 42% GHG emission reduction compared to 1990.
	Develop monitoring and evaluation mechanisms to improve the implementation and enforcement of the country's energy policy.	Work ongoing. The NECP envisages a single governance framework to monitor and assess the set policy measures. A fundamental component of the single governance framework is an integrated monitoring mechanism to monitor the NECP targets, and to assess the impact of each policy measure. The Inter-Ministerial Committee for Energy and Climate was established to develop and implement the governance framework of the monitoring mechanism.
2020	Expedite the development of action plans that will guide the implementation of the NECP goals.	Improvement suggested in 2020. Status will be updated in 2021.
Indicator 2		
2018	Ensure that enacted and draft laws, as well as regulations in force, are made available in English or other foreign languages.	Work ongoing. All the new strategy documents and national plans of Greece are available in English, for instance, the NECP 2030.
2019	Integrate amendments and corrigenda to consolidated texts of legal acts.	Pending
2020	Ensure that the Official Gazette provides information on the relationship between different pieces of legislation by establishing the link between basic acts and related amendments, corrigenda and repeals, or between a consolidated resource and the changes it incorporates.	Improvement suggested in 2020. Status will be updated in 2021.
Indicator 3		
2018	Abolish measures that limit the transfer of capital abroad.	Fully implemented. Capital transfer restrictions that were imposed in 2015 were completely removed as of 1 September 2019 by Law no.4624/2019.
2020	Take measures to reduce the Regulatory Authority for Energy's (RAE) consistently increasing workload on project licensing, especially in relation to renewable energy projects.	Improvement suggested in 2020. Status will be updated in 2021.
Indicator 4		
	Adopt effective case management measures to lower the domestic courts' caseload and accelerate judicial proceedings. Make alternative dispute resolution mechanisms widely available and applicable.	Work ongoing. Law no. 4635/2019 introduced mandatory electronic filing and processing of legal documents in administrative courts. Parties to the judicial proceedings will now be allowed remote access to the case files. Law no. 4640/2019 on Mediation, published in the Official Gazette in November 2019, enhanced the requirement of mandatory initial mediation for a broad category of civil and commercial disputes of either national or cross-border nature, and harmonised the Greek legislation with the provisions of Directive 2008/52/EC.
2018	Incorporate a general definition of the term "public interest" in the Expropriation Code (Law no. 2882/2001) to clarify its scope and application. Widen the scope of the Expropriation Code, which only covers real property, to include other types of property.	Pending
	Avoid the retroactive application of laws to increase investment security.	Fully implemented. In 2014, the total amount of State aid (feed-in-tariff) received by the renewable energy producers was retroactively amended by Law no. 4254/2014. However, since 2014 Greece has not made any retroactive changes to the law.