It is indeed difficult to make comments or suggest changes at this stage of adoption as both Pillar proposals present problems in their approach, insist on using number of events etc and do not follow the agreed approach B.

Therefore, any suggestions for changes on our side or from any other country, would mean significant delays without visible expected improvement as lack of common understanding is evident.

**To provide an example see the following:**

Pillar 3

**The selected types of indicators** **do not correspond to** the expected results and targets of the actions mentioned in the A.P. and further to this most of the indicators are not calculated. e.g.

* + Joint measures, such as clean-up programmes, addressing marine litter stemming from land-based sources, lost and discarded fishing gear, and recreational activities.
	+ Reduction in the amount of microplastics and other pollutants in seawater, leading to improved water quality and reduced risks to human health and marine life.
	+ Activities supporting the implementation of the sub/regional oil spill contingency plan (REMPEC) for the Adriatic-Ionian Region.
	+ Improved of monitoring and the knowledge base of nutrient flows and load, to enable better decision-making and more targeted interventions. No indicators are selected.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| OI: Number of activities supporting the implementation of global and EU targets for biodiversity through the participations in joint training schemes  | RCO85 Interreg: Participations in joint training schemes  | 0 (2023) | tbd(2030) | TSG 3  |
| OI: Number of activities supporting the implementation of global and EU targets for biodiversity through the participation in joint actions across borders | RCO81 Interreg: Participation in joint actions across borders | 0 (2023) | tbd (2030) | TSG 3 |
| OI: Number of events on pollution deriving from maritime traffic and marine litter from ships | Completion of joint training schemes (RCR81) | 0 (2023) | 3 (2023) TBD | TSG3 questionnaire |
| RI: Marine litter does not adversely affect the coastal and marine environment |  |  |  | Decision IG.26/3 COP Barcelona ConventionAnnex I DIRECTIVE 2008/56/EC |
| RI: Concentrations of contaminants are at levels not giving rise to pollution effects |  |  |  | Decision IG.26/3 COP Barcelona ConventionAnnex I DIRECTIVE 2008/56/EC |
| No. of dissemination events of the REMPEC contingency plan  | RCO83 Interreg: Strategies and action plans jointly developedRCR79 Interreg: Joint strategies and action plans taken up by organisations | 0 (2023) | TBD | TSG3 questionnaire |
| RI: Human-induced eutrophication is minimised, especially adverse effects thereof, such as losses in biodiversity, ecosystem degradation, harmful algal blooms and oxygen deficiency in bottom waters |  | ? (2023) | Tbd (2030) | Decision IG.26/3 COP Barcelona ConventionAnnex I DIRECTIVE 2008/56/EC |

Following the above problems and in order to avoid blocking or significantly delaying the process of the adoption of the Strategy and A.P. revision, the Greek Authorities will not respond to the message received or make any comments so that “**absence of reaction be taken as silent agreement”.** It will be up to the Commission to request or make any changes.

In the near future, and as the A.P. is considered a dynamic documents improvement where necessary should be pursued.