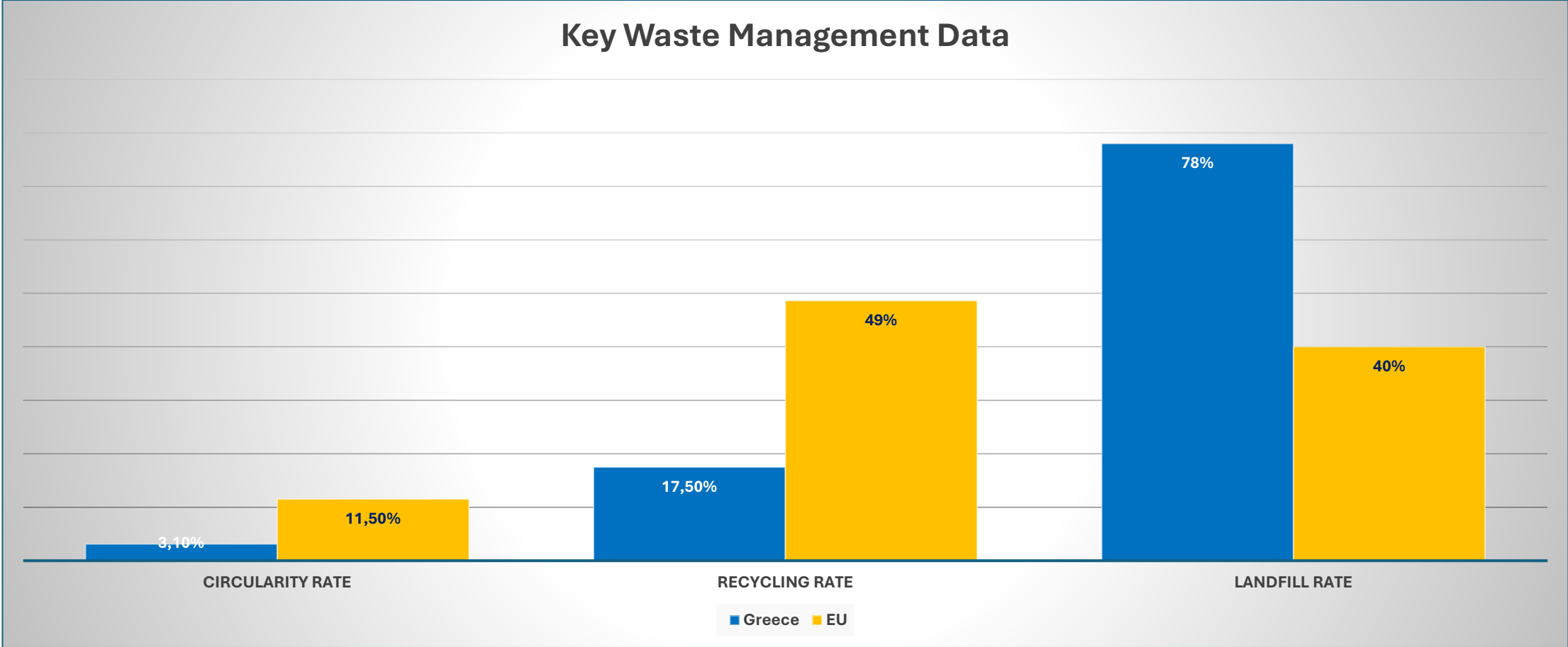


Greece requires an urgent review of strategy and clarification of the regulatory environment

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Greece is not converging with the EU



Despite the progress uncertainties persist and are the main concern in the waste management sector

There is considerable progress in the development of MBT infrastructure but with an urgent need of extensive upgrades to achieve recycling and landfill diversion targets.

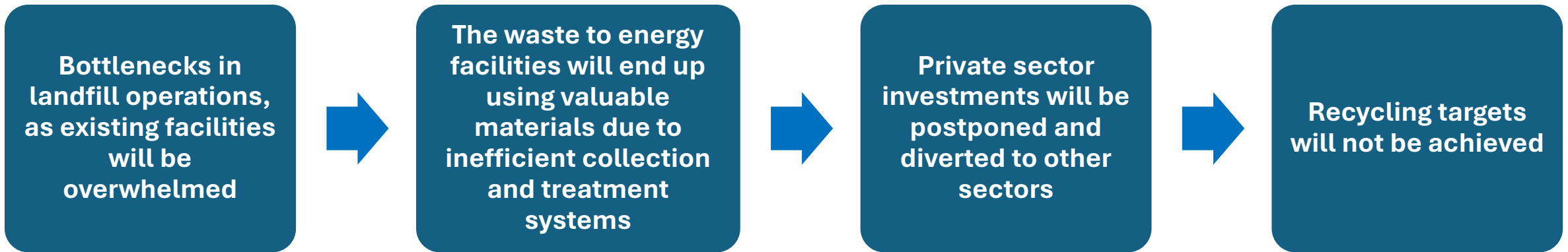
At the same time there is uneven development across the country, fragmented value chains, difficulties in implementing sorting at source, missing links or overlaps (recycling and waste to energy), delays in tendering procedures.

Furthermore, the regulatory & operational framework has not yet been crystalized, uncertainty persists on revision of regional planning frameworks, state aid/funding and competition issues have to be resolved, the liability and accountability of the waste management authorities and the private operators have to be clarified as well as the action plan and the way to move forward.

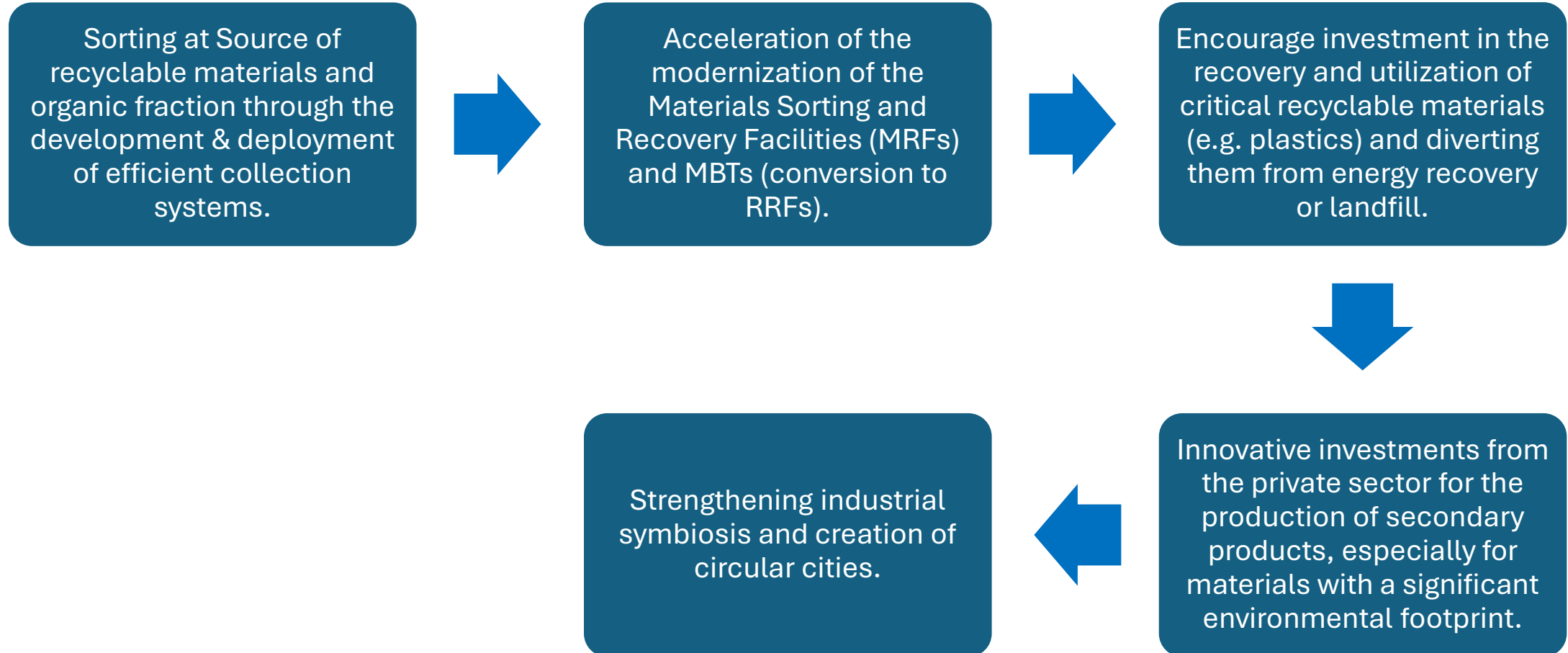
To Move Forward We should Clarify the Regulatory Environment and Provide a Clear and Precise Roadmap

- To exploit the full potential of the market the regulatory environment and a detailed map providing clear guidelines to all stakeholders should be provided and clarified as soon as possible - preferably before the end of 2024.
- All stakeholders should be able to assess the implications of the new implementation framework before taking further decisions on investments and forms of cooperation between the private and public sector.
- Key issues should be addressed and resolved:
 - There is an urgent need to clarify the funding mechanism of the transformation of MBTs to RRFs and of new projects with the **pro rata** regime and how to cover the gaps that may arise – What is the impact of applying the **pro rata regime** for Solid Waste Management Authorities?
 - The requirement to update/complete the Regional waste management plans was announced approx. 9 months ago. A tender is currently in place for their update but the real question is: when will this be actually completed? Further delays have serious impacts on the swm projects/investments & achievement of targets. Furthermore, what will be the impact on waste tariffs?
 - How state aid policies will be applied in waste management sector? The required market analysis is based on the possibility & the potential interest of the private sector offering the services. But what exactly are the regulatory conditions set by law for offering private waste management services in Greece? Given that waste is an asset, how will the authorities offer long term contracts to the private sector so as for a private operator to exploit this asset?
- The European Commission and the Greek Government should undertake credible evaluation studies on the full impact of the new regulations on the end users (households) of the waste management system.
- ***Transparency is the key to sustainable policies.***

Further delays in the completion of the necessary infrastructure would generate a new round of complications



A new set of key priorities is required



Thank you

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