



Brussels, 3 July 2025
(OR. en)

11095/25

Interinstitutional File:
2025/0196 (NLE)

ECOFIN 933
UEM 379
FIN 805
ECB
EIB

COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	30 June 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

No. Cion doc.:	COM(2025) 367 final
Subject:	Proposal for a COUNCIL IMPLEMENTING DECISION amending Implementing Decision (EU) (ST 10152/21 INIT; ST 10152/21 ADD 1) of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece

Delegations will find attached document COM(2025) 367 final.

Encl.: COM(2025) 367 final

11095/25

EN



EUROPEAN
COMMISSION

Brussels, 30.6.2025
COM(2025) 367 final

2025/0196 (NLE)

Proposal for a

COUNCIL IMPLEMENTING DECISION

**amending Implementing Decision (EU) (ST 10152/21 INIT; ST 10152/21 ADD 1) of 13
July 2021 on the approval of the assessment of the recovery and resilience plan for
Greece**

{SWD(2025) 177 final}

Proposal for a

COUNCIL IMPLEMENTING DECISION

amending Implementing Decision (EU) (ST 10152/21 INIT; ST 10152/21 ADD 1) of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility¹, and in particular Article 20(1) thereof,

Having regard to the proposal from the European Commission,

Whereas:

- (1) Following the submission of the national recovery and resilience plan ('RRP') by Greece on 27 April 2021, the Commission has proposed its positive assessment to the Council. The Council approved the positive assessment by means of the Council Implementing Decision of 13 July 2021². That CID was amended on 8 December 2023³, 16 July 2024⁴, and 21 January 2025⁵.
- (2) On 14 May 2025, Greece made a reasoned request to the Commission to make a proposal to amend the Council Implementing Decision of 13 July 2021 in accordance with Article 21(1) of Regulation (EU) 2021/241 on the grounds that the RRP is partially no longer achievable because of objective circumstances. On that basis, Greece has submitted an amended RRP.

Amendments based on Article 21 of Regulation (EU) 2021/241

- (3) The amendments to the RRP submitted by Greece because of objective circumstances concern 108 measures.
- (4) Greece has explained that eight measures are partially or totally no longer achievable due to unexpected delays related to public procurement procedures. This concerns, respectively, milestone 64 under measure 16851 Biodiversity protection as a driver for

¹ OJ L 57, 18.2.2021, p. 17.

² ST 10152/21 INIT; ST 10152/21 ADD 1.

³ ST 15831/23 INIT REV1; ST 15831/23 ADD 1 REV 1.

⁴ ST 11858/24 INIT; ST 151858/24 COR 1; ST 151858/24 ADD 1; ST 151858/24 ADD COR 1.

⁵ ST 17055/24 INIT; ST 17055/24 ADD 1; ST 17055/24 ADD 1 COR 1.

sustainable growth, milestone 82 under measure 16911 Aerial means for crisis management, milestone 80 under measure 16283 Implementation of Regional Civil Protection Centers (PEKEPP) through PPP schemes under component 1.4 Sustainable use of resources, climate resilience and environmental protection, milestone 108 under measure 16779 Interoperability and web services development, milestone 128 under measure 16827 Data Governance Strategy and Policies under component 2.2 Modernise, target 182 and milestone 182a under measure 16925 Digital Transformation of the social support system under component 3.4 Increase access to effective and inclusive social policies, milestone 213 under measure 16703 Combating illegal trade and protecting intellectual property, under component 4.2 Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption, target 261 and milestone 262 under measure 16630 Cretan Northern Highway (B.O.A.K.) under component 4.6 Modernise and improve resilience of key economic sectors. On this basis, Greece has requested to amend certain requirements of the aforementioned measures to address unexpected delays related to public procurement. Furthermore, Greece has requested to decrease the scope of measure 16827. Furthermore, Greece has requested to remove measure 16283. Furthermore, Greece has requested to remove the interim target 261. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

- (5) Greece has explained that nine measures are partially or totally no longer achievable because of lower than expected demand. This concerns, respectively, target 35 under measure 16876 Energy upgrade of public sector buildings under component 1.2 Renovate, milestones 312 and 316 under measure 16285 Investments in the national irrigation network through PPP schemes under component 1.4 Sustainable use of resources, climate resilience and environmental protection, target 90 under measure 16818 Fiber optic infrastructure in buildings under component 2.1 Connect, targets 183 and 186, milestone 186a under measure 16922 Social Integration, milestones 174a, 179 and 176 under measure 16904 Disability, targets 177 and 180 and milestone 180a under measure 16919 Child Protection under component 3.4 Increase access to effective and inclusive social policies, milestone 220 under measure 16705 Digital Transformation of Fiscal Management and Supervision in Governance & Electronic Invoicing under component 4.2 Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption, milestone 346 under measure 16622 HORIZON 2020 “Seal of Excellence”: financing top innovative companies under component 4.5 Promote research and innovation. On this basis, Greece has requested to amend certain requirements of the aforementioned measures to reflect the lower than expected demand. Furthermore, Greece has requested to decrease the scope of measures 16876 and 16705. Furthermore, Greece has requested to remove target 35, milestone 312, target 177 and target 180. The Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (6) Greece has explained that six measures are partially or totally no longer achievable due to supply chain disruptions. This concerns, respectively, milestones 10 and 15 under measure 16871 Revitalization actions of the most affected territories (Just transition territories), milestone 16 under measure 16926 Support of the installation of storage systems to enhance RES penetration under component 1.1 Power up, milestones 51, 53, and 54 under measure 16831 Produc-E Green under component 1.3 Recharge and refuel, target 118 under measure 16826 Digital skills upgrade programs for conscripts, under component 2.2 Modernise, milestones 365 and 366 under

measure 16996 Installation of energy storage for additional RES penetration, milestones 372 and 373 under measure 16997 Promotion of CCS technologies to foster industry decarbonization under component 5.2 REPowerEU Investments. On this basis, Greece has requested to amend certain requirements of the aforementioned measures to address the perceived supply chain disruptions. Furthermore, Greece has requested to remove measures 16997 and 16826. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

- (7) Greece has explained that eight measures are partially or totally no longer achievable due to unforeseen legal issues. This concerns, respectively, milestone 29 under measure 16879 Preparation of Urban Plans in implementation of the urban policy reform, milestone 30 under measure 16894 Establishment of new special spatial planning for RES, industry, tourism and aquaculture under component 1.2 Renovate, milestone 141a under measure 16941 Restructuring and rebranding of OAED local PES (KPA2) under component 3.1 Promote job creation and participation in the labour market, milestone 145b under measure 16794 Strengthening the Apprenticeship System under component 3.2 Education, vocational education and training, and skills, target 187 under measure 16688 Promote integration of the refugee population into the labour market under component 3.4 Increase access to effective and inclusive social policies, milestones 195a, 195 and 196 under measure 16291 Digital Transformation of the Tax and Customs Administration under component 4.1 Making taxes more growth friendly and improving tax administration and tax collection, milestone 271 under measure 16892 Upgrading suburban railway of West Attica, milestone 306 under measure 16599 Digitalization of Economic Diplomacy Network & Exporters Training Program under component 4.6 Modernise and improve resilience of key economic sectors. On this basis, Greece has requested to amend certain requirements and reduce scope of the aforementioned measures to address unforeseen legal issues. Furthermore, Greece has requested to remove measure 16599. The Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (8) Greece has explained that three measures are partially no longer achievable due to unexpected technical challenges. This concerns, respectively, milestone 171 under measure 16757 Establishment of a Radiotherapy Centre at the “Sotiria” Thoracic Diseases Hospital of Athens, target 156, new target 156a, and targets 157 and 158 under measure 16816 Reforms and acceleration of investments in the Healthcare Sector - Clawback reduction and rationalization of healthcare expenditure under component 3.3. Improve resilience, accessibility and sustainability of healthcare, and milestone 211a under measure 16952 Strengthening the National Anti-Corruption Framework through targeted interventions in the fields of detection, prevention and raising awareness under component 4.2 Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption. On this basis, Greece has requested to split target 156 into two targets of measure 16816, reduce the scope of measure 16757, and add a new milestone 211a to the aforementioned measure 16952. The Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (9) Greece has explained that 27 measures have been amended to implement better alternatives in order to achieve the original ambition of the measure. This concerns milestone 40 under measure 16873 Interventions in residential areas and in the building stock, milestone 39 under measure 16932 Olympic Athletic Center of Athens under component 1.2 Renovate, milestones 45a and 49, and targets 52 and 55 under

measure 16924 Electromobility under component 1.3 Recharge and refuel, milestone 81 under measure 16910 Monitoring and Management System under component 1.4 Sustainable use of resources, climate resilience and environmental protection, milestone 122 under measure 16853 Supply of Central Cloud Computing Infrastructure and Service, milestone 125 under measure 16955 Upgrade of Cloud-computing infrastructure and services of the National Infrastructures for Research and Technology (GRNET), milestone 124 under measure 16928 Incorporation of new technologies and trends towards Public Administration's advanced services, increase of efficiency and effectiveness, and decrease of systems operating, upgrade and maintenance costs, targets 94 and 95 under measure 16778 Digitisation of archives and related services, milestone 99 under measure 16929 Towards Public Administration's "customer"-oriented services through simplification and improvement of processes, systems enhancements and compliance with European strategies and policies under component 2.2 Modernise, milestone 131 and new milestone 131a under measure 16706 Digital Transformation of SMEs, milestone 132 under measure 16973 Establishment of a digital business ecosystem and introduction of tax incentives for the facilitation of the SMEs digital transformation under component 2.3 Digitalisation of business, milestone 146 under measure 16792 Labor force skilling, reskilling and upskilling through a reformed training model (Vocational Education & Training Reform), milestone 150 under measure 16289 Strategy for Excellence in Universities & Innovation, milestone 152 under measure 16934 Upgrading Vocational Education and Training under component 3.2 Education, vocational education and training, and skills, milestone 161 and target 166 under measure 16755 Reform of the Primary Health Care System, milestone 165 under measure 16783 Implementation of the National Public Health Prevention Program "Spiros Doxiadis" (NPP"SD"), milestones 335 and 336 under measure 16984 Personal Doctor reform under component 3.3 Improve resilience, accessibility and sustainability of healthcare, milestones 175 and 175a under measure 16726 Social Benefits Optimisation, target 184 under measure 16685 Diversity Awareness under component 3.4 Increase access to effective and inclusive social policies, target 189 under measure 16614 Online cash registers & POS (reform) under component 4.1 Making taxes more growth friendly and improving tax administration and tax collection, targets 342 and 344, milestones 343 and 345 under measure 16986 Completion of the national cadastre milestone 216 under measure 16711 Professionalization of Public Procurement domain under component 4.2 Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption, milestone 243 under measure 16581 Enhanced capital market supervision and trustworthiness, milestones 244b and 244c under measure 16957 Strengthening the capacity of the financial system to overcome legacy challenges and finance the real economy under component 4.4 Strengthen the financial sector and capital markets, milestones 268, 268a, 268b and 268c under measure 16982 Organisational reform in the railways sector under component 4.6 Modernise and improve resilience of key economic sectors, milestone 355 under measure 16988 Regulatory and market operation framework for carbon capture, usage, and storage technologies to foster industry decarbonisation under component 5.1 REPowerEU reforms, targets 368 and 369 under measure 16994 Energy Efficiency and promotion of RES for auto-consumption under component 5.2 REPowerEU investments. On this basis, Greece has requested to amend certain requirements of the aforementioned measures to implement better alternatives. Furthermore, Greece has requested to extend the implementation timeline of some of the aforementioned measures,

specifically milestones 175 and 355. Furthermore, Greece has requested to remove interim targets and milestones, specifically target 94, milestone 161 milestone 49 and target 55.. Furthermore, Greece has requested to remove milestone 345 by advancing its implementation and merging it with milestone 343. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

- (10) Greece has explained that 33 measures have been amended to implement a better alternative allowing to reduce the administrative burden, whilst still reaching the objectives of the respective measures. This concerns target 8 under measure 16865 Restructuring and enhancement of the RES CHP Account revenues, milestone 2 under measure 16870 Interventions for the electricity interconnection of islands and the upgrading of the electricity network under component 1.1 Power up, the measure description of measure 16875 Infrastructure development and buildings' restoration in former royal estate in Tatoi under component 1.2 Renovate, milestones 72 and 73 under measure 16846 Urban Wastewater and Sludge Management Infrastructures from Wastewater Treatment, milestones 62a and 63 under measure 16849 National Reforestation Plan and Parnitha flagship investment, milestones 71 and 74 under measure 16850 Drinking Water Supply and Saving Infrastructures, milestone 332 under measure 16983 Preliminary inspection of seismic resistance of buildings under component 1.4 Sustainable use of resources, climate resilience and environmental protection, milestone 119 under measure 16736 New system for Public Procurements, milestone 113 under measure 16738 Central Document Management System, milestone 110 under measure 16780 Further Modernisation of Public Administration's One-Stop Shops, milestone 98 under measure 16782 Interconnection and interoperability of registries, systems and services for data exchange between national public organisations and interoperability of registries, systems and services for data exchange between national public organisations, milestone 123 under measure 16854 Smart Cities, milestone 111 under measure 16965 Data Classification Studies for Public Sector's Information Systems under component 2.2 Modernise, milestone 163 under measure 16756 Organizational Reforms in the Health System under component 3.3 Improve resilience, accessibility and sustainability of healthcare, milestone 194 under measure 16611 Digital transformation of tax audits, milestones 204 and 204a under measure 16643 Codification and simplification of tax legislation under component 4.1 Making taxes more growth friendly and improving tax administration and tax collection, milestone 212 under measure 16702 Enhancing the AML/CFT Framework, milestone 208 under measure 16972 Reforming Public Administration, milestone 219 under measure 16974 Accounting Reform under component 4.2 Modernise the public administration, including through speeding up the implementation of public investments, improving the public procurement framework, capacity building measures and fighting corruption, milestone 237 under measure 16292 New Judicial Buildings, milestones 236 and 238 under measure 16575 Accelerating the administration of justice, milestone 235 under measure 16733 Skills and digital skills for judges and judicial employees (judicial staff) under component 4.3 Improve the efficiency of the justice system, milestones 247 and 247a under measure 16624 Creation-Expansion-Upgrade of Infrastructures of Research Centers supervised by the General Secretariat for Research and Innovation (GSRI) under component 4.5 Promote research and innovation, milestone 272 and 272a under measure 16949 Smart Bridges, milestone 285 under measure 16725 Upgrading higher arts education, milestone 277 under measure 16786 Simplification of the Procedures of the Ministry of Infrastructure & Transport, milestones 295 and 297 under measure 16931 Tourism Development, milestone 314 under measure 16626 Economic

transformation on the Agricultural Sector, milestone 315 under measure 16584 Proposals for actions in the Aquaculture Sector, milestones 255 and 256 under measure 16628 Central Greece Highway E-65: Trikala-Egnatia Section under component 4.6 Modernise and improve resilience of key economic sectors, milestone 356 under measure 16990 Grid and storage capacity – fostering of storage investments, milestone 361 under measure 16992 Toolset to promote energy sharing, self-consumption and renewable Energy Communities, milestone 363 under measure 16993 Roadmap for innovative energy efficiency interventions and identification of new financial instrument under component 5.1 REPowerEU Reforms. On this basis, Greece has requested to amend certain requirements of the aforementioned measures. Furthermore, Greece has requested to remove measure 16965 and merge it in measure 16827. Furthermore, Greece has requested to remove the interim milestones and targets, specifically milestone 2, milestone 71, milestone 72 and milestone 255. The Council Implementing Decision of 13 July 2021 should be amended accordingly. should be amended accordingly.

- (11) Following the removal of measures under Article 21 of Regulation (EU) 2021/241, Greece has further requested to use the resources freed up by the removal of certain measures and decrease in the level of their implementation to increase the level of implementation of 14 measures. This concerns targets 24, 25 and 26 under measure 16872 Energy renovation on residential buildings under component 1.2 Renovate, milestone 84 under measure 16909 Infrastructure - Establishment of a strategic National Disaster Risk Management under component 1.4 Sustainable use of resources, climate resilience and environmental protection, milestone 109 under measure 16810 CRM for the General Government under component 2.2 Modernise, milestones 136 and 137 and the new milestone 134a under measure 16750 Digital Transformation of Labour Systems, target 144 and milestone 144a under measure 16747 Active Labour Market Policies Reform under component 3.1 Promote job creation and participation in the labour market, milestone 148b under measure 16676 Digital transformation of Education under component 3.2 Education, vocational education and training, and skills, milestones 167, 168 and 173 under measure 16752 Digital Transformation of Health (DigHealth) under component 3.3 Improve resilience, accessibility and sustainability of healthcare, milestone 185 under measure 16763 Digital Transformation of the Migration and Asylum system, milestones 181 and 181a under measure 16402 Social and Affordable Housing under component 3.4 Increase access to effective and inclusive social policies, milestones 258 and 259 under measure 16631 Road Safety Upgrade, milestone 274 under measure 16959 Digital Transformation of the Hellenic Railways Organisation, milestone 275 under measure 16960 Smart Infrastructure with environmental and cultural focus, milestones 293 and 298 under measure 16975 Upgrade Interventions for Regional Ports under component 4.6 Modernise and improve resilience of key economic sectors, milestone 370 and target 371 under measure 16995 Pilot projects for Biomethane and Renewable Hydrogen Production under component 5.2 REPowerEU investments. On this basis, Greece has requested to increase the level of implementation of the aforementioned measures. Furthermore, Greece has requested to remove target 24, milestones 136 and 137, and target 293. The Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (12) Greece has explained that milestones 347, 348, 349, and 350 under measure 16999 Accessibility Restoration following the devastating effects of storm "DANIEL" under component 4.6 Modernise and improve resilience of key economic sectors are partially no longer achievable, because of higher than expected cost of restoration in the

aftermath of a natural disaster. On this basis, Greece has requested to decrease the scope of the measure. Furthermore, Greece has requested to remove interim milestones 347 and 348. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

- (13) The Commission considers that the reasons put forward by Greece justify the amendment(s) pursuant to Article 21(2) of Regulation (EU) 2021/241, and the Council Implementing Decision of 13 July 2021 should be amended accordingly.

Distribution of milestones and targets

- (14) The distribution of milestones and targets in instalments should be modified to take into account the amendments to the plan and the indicative timeline presented by Greece.

Corrections of clerical errors

- (15) Four clerical errors have been identified in the text of the Council Implementing Decision, affecting five milestones and four measures under four components. The Council Implementing Decision should be amended to correct these clerical errors that do not reflect the content of the RRP submitted to the Commission on 27 April 2021, as agreed between the Commission and Greece. Those clerical errors relate to, milestone 140 of measure 16913 A New Strategy for Lifelong Skilling: Modernising and Upgrading Greece's Upskilling and Reskilling System under component 3.2 Education, vocational education and training, and skills, milestones 339 and 340 of measure 16985 Modifications to Greece's tax policy framework under component 4.1 Making taxes more growth friendly and improving tax administration and tax collection, milestone 269 and the description of measure 16833 Implementation of EASA compliance rectification works under component 4.6 Modernise and improve resilience of key economic sectors, milestone 319 and the description of measure 16543 Actions for the simplification of the business environment and its upgrading in quality and safety under component 4.7 Improve competitiveness and promote private investments and trade. Those corrections do not affect the implementation of the measures concerned.

Commission's assessment

- (16) The Commission has assessed the amended RRP against the assessment criteria laid down in Article 19(3) of Regulation (EU) 2021/241.
- (17) The Commission considers that the amendments put forward by Greece do not affect the positive assessment of the RRP set out in the Council Implementing Decision ST 10152/21 of 13 July 2021 on the approval of the assessment of the RRP for Greece regarding the relevance, effectiveness, efficiency and coherence of the RRP against the assessment criteria laid down in Article 19(3), points (a), (b), (c), (d),(da), (db), (e), (f), (g), (h), (i), (j) and (k).

Do no significant harm

- (18) In accordance with Article 19(3), point (d), of and Annex V, criterion 2.4, to Regulation (EU) 2021/241, the amended RRP is expected to ensure that no measure (Rating A) for the implementation of reforms and investments projects included in this RRP does significant harm to environmental objectives within the meaning of Article

17 of Regulation (EU) 2020/852 of the European Parliament and of the Council⁶ (the principle of ‘do no significant harm’).

- (19) The amended RRP assesses compliance with the principle of ‘do no significant harm’ following the methodology set out in the technical guidance provided in the Commission Notice entitled ‘Technical guidance on the application of “do no significant harm” under the Recovery and Resilience Facility Regulation’⁷.
- (20) Greece submitted an assessment of the principle of ‘do no significant harm’ for each new and substantially revised measure of the amended RRP. The information provided shows that the RRP is expected to ensure compliance with that principle. The information provided by Greece makes it possible to conclude that the RRP is expected to ensure that none of the measures does significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852.

Contribution to the green transition including biodiversity

- (21) In accordance with Article 19(3), point (e), of and Annex V, criterion 2.5, to Regulation (EU) 2021/241, the amended RRP contains measures that contribute to a large extent (Rating A) to the green transition, including biodiversity, or to addressing the challenges resulting therefrom. The measures supporting climate objectives account for an amount which represents 38.1% of the amended RRP’s total allocation and 81.6% of the total estimated costs of measures in the REPowerEU chapter calculated in accordance with the methodology set out in Annex VI to Regulation (EU) 2021/241. In accordance with Article 17 of Regulation (EU) 2021/241, the amended RRP is consistent with the information included in the National Energy and Climate Plan 2021-2030.
- (22) The amended RRP maintains measures supporting the green transition that contribute to achieving the 2030-2050 targets and the objective of Union’s climate neutrality by 2050, as well as fostering biodiversity. For instance, the ambition of measure 16924 has been considerably increased in the amended RRP, as the target for electric buses for public transport has been upscaled from 220 to 425.

Contribution to the digital transition

- (23) In accordance with Article 19(3), point (f), of and Annex V, criterion 2.6, to Regulation (EU) 2021/241, the amended RRP contains measures that contribute to a large extent (Rating A) to the digital transition or to addressing the challenges resulting from it. The measures supporting digital objectives account for an amount which represents 22.3% of the amended RRP’s total allocation calculated in accordance with the methodology set out in Annex VII to that Regulation.
- (24) The measures in the amended RRP continue contributing to the digital transition or helping to address the related challenges and positively address Greece’s shortcomings in the digital field as identified in the second State of the Digital Decade report 2025. The amended RRP continues to significantly address the digital transition challenges faced by Greece in the areas of connectivity, digital public services, human capital and digital skills, the digitalisation of businesses and the adoption of advanced digital technology.

⁶ Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (OJ L 198, 22.6.2020, p. 13).

⁷ OJ C 58, 18.2.2021, p. 1.

Costing

- (25) In accordance with Article 19(3), point (i), of and Annex V, criterion 2.9, to Regulation (EU) 2021/241, the justification provided in the amended RRP on the amount of the estimated total costs of the RRP is to a medium extent (Rating B) reasonable and plausible, is in line with the principle of cost efficiency and is commensurate to the expected national economic and social impact.
- (26) The justification provided by Greece on the amount of the estimated costs of the RRP was to a medium extent reasonable, plausible and in line with the principle of cost efficiency. Greece provided sufficient information and evidence that estimated costs were not covered by existing or planned Union financing. However, in a limited number of cases, costs estimates could not be sufficiently substantiated. Overall, this warrants a rating of B under the assessment criterion of Article 19(3), point (i), of Regulation (EU) 2021/241.

Any other assessment criteria

- (27) The Commission considers that the amendments put forward by Greece do not affect the positive assessment of the RRP set out in the Council Implementing Decision ST 10152/21 of 13 July 2021 on the approval of the assessment of the RRP for Greece regarding the relevance, effectiveness, efficiency and coherence of the RRP against the assessment criteria laid down in Article 19(3), points (a), (b), (c), (da), (db), (g), (h), (j) and (k).

Measures supporting investment operations contributing to the objectives of the Strategic Technologies for Europe Platform (STEP)

- (28) In accordance with Article 4(4) of the Regulation (EU) 2024/795, Greece considered as a matter of priority projects that have been awarded a Sovereignty Seal pursuant to Article 4(1) of the Regulation (EU) 2024/795. However, Greece considered that no project having been awarded a Sovereignty Seal was to be included in the amended RRP because their timeline goes beyond 2026.

Positive assessment

- (29) Following the positive assessment by the Commission of the amended RRP with the finding that the RRP satisfactorily complies with the criteria for assessment set out in Regulation (EU) 2021/241, in accordance with Article 20(2) of and Annex V to that Regulation, the reforms and investment projects necessary for the implementation of the amended RRP, the relevant milestones, targets and indicators, and the amount made available from the Union for the implementation of the amended RRP in the form of non-repayable financial support should be set out.

Financial contribution

- (30) The estimated total costs of Greece's amended RRP is EUR 36 371 226 245. As the amount of the estimated total costs of the amended RRP is higher than the updated maximum financial contribution available for Greece, the financial contribution determined in accordance with Article 4a of Regulation (EU) 2021/1755 of the European Parliament and of the Council, Article 20(4) and 21a(6) of Regulation (EU) 2021/241 allocated for Greece's amended RRP should be equal to EUR 18 220 378 076. Therefore, the financial contribution made available to Greece remains unchanged.

Loans

- (31) The loan support made available to Greece amounting to EUR 17 727 538 920 remains unchanged.
- (32) Council Implementing Decision ST 10152/21 INIT; ST 10152/21 ADD 1 of 13 July 2021 on the approval of the assessment of the RRP for Greece should therefore be amended accordingly. For the sake of clarity, the Annex to that Council Implementing Decision should be replaced entirely,

HAS ADOPTED THIS DECISION:

Article 1

The Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Greece is amended as follows: (1) Article 1 is replaced by the following:

“Article 1

Approval of the assessment of the RRP

The assessment of the modified RRP of Greece on the basis of the criteria provided for in Article 19(3) of Regulation (EU) 2021/241 is approved. The reforms and investment projects under the RRP, the arrangements and timetable for the monitoring and implementation of the RRP, including the relevant milestones and targets, the relevant indicators relating to the fulfilment of the envisaged milestones and targets, and the arrangements for providing full access by the Commission to the underlying relevant data are set out in the Annex to this Decision.”;

Article 2

Addressee

This Decision is addressed to the Hellenic Republic.

Done at Brussels,

For the Council
The President