



**HWEA**  
**HELLENIC WIND ENERGY ASSOCIATION**

To:

Mrs. Jessika Roswall

Commissioner for Environment, Water Resilience and a Competitive Circular Economy

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cc:

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Prot. No: 2025/421

Athens, 21 March 2025

**Subject: Policy issues for wind energy and biodiversity in Greece**

Dear Commissioner,

With this letter, we would like to bring to your attention three important policy issues concerning the development of wind energy in relation to biodiversity protection in Greece. Renewables and biodiversity constitute two significant pillars of the sustainable development.

As a matter of principle, we support the case-by-case, specific, and detailed assessment of each proposed investment project based on strict environmental protection criteria as per the EU and national legislation. We approach with great skepticism the establishment of broad, horizontal, a-priori exclusion zones that do not allow for the scientific and well-documented assessment of each case based on actual and specific data. Having said that, we note the following:

1. Greek government is considering the blanket, across-the-board modification of all issued Environmental Impact Approvals (EIA) for under development and operational wind parks in an extensive area — too many kilometers around the area which was burned in the summer of 2023 in **North Greece (Thrace)** due to extreme wildfire<sup>1</sup>. Imposing new, excessive

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<sup>1</sup> In the summer of 2023, areas of Thrace (at North Greece) with significant biodiversity were suffered by extensive forest fires. Clearly, the 2023 wildfire was an unprecedented event of exceptional significance, with consequences on multiple levels, including social aspects. As such, it has created significant new needs for

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terms and conditions in already licensed and operational projects can only be done after case-by-case assessment by the competent public body foreseen in the existing legislation, and subject to specific justification that these new terms are necessary for each wind farm.

2. Significant problems arise with **requests to modify the design of wind farms that have already received Environmental Terms Approval (AEPO) in Natura areas**. Several authorities, including regional authorities and the National Environment and Climate Change Agency, examine these requests as if they were new projects, reassess the overall project's impacts, and disregard the differentiation of impacts resulting from the proposed modifications. In the vast majority of cases, the environmental footprint is reduced due to a decrease in construction and interventions (e.g. fewer wind turbines). This approach causes delays and legal uncertainty.
3. Greece is conducting **specialized studies and plans for the more effective protection and management of Natura areas**. This is very important and necessary. However, in almost all of these studies, wind energy is overlooked. The studies propose that wind turbines should not be installed in nearly all of these areas, without providing a detailed justification of the specific potential impacts on each individual sub-area. Additionally, the studies do not include an assessment of the impact that this exclusion will have on development and energy costs. Finally, this exclusion creates legal uncertainty and ambiguity regarding the renewal of already operating projects.

The above does not exhaust the issue of the relationship between wind energy and biodiversity in Greece. For this reason, we remain at your disposal or that of your associates to discuss all related matters.

Sincerely,

Panagiotis Ladakakos

President HWEA

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managing its impacts and drawing lessons and conclusions—not only regarding accountability but, above all, for improving future planning.

Taking into account that several wind parks are currently in operation in the broader area, around the burned areas, the wind energy sector has been and remains willing to develop and implement an effective solution framework—without sensationalism or populism—based on two key pillars:

- Synergies on how existing and future wind farms in the area could contribute to wildfire prevention and response.
- Utilization of tools already provided by legislation on a case-by-case basis, in order to possibly impose additional environmental terms on specific wind parks if it is improved that this is necessary due to the new situation.