HWEA
HELLENIC WIND ENERGY ASSOCIATION

To:

Mrs. Céline Gauer

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cc:

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Athens, 22 June 2026

Dear Director-General Gauer,

The Hellenic Wind Energy Association (HWEA) ELETAEN is the collective voice of the wind energy sector in Greece. Our members include Greek and international companies active across the entire wind energy value chain, including turbine manufacturers, project developers, investors, operators, service providers, and other industry stakeholders. Membership is also open to individuals, scientists, professionals, and academics engaged in the wind energy sector. HWEA ELETAEN was founded in 1990 and is a member of WindEurope.

Through this letter, we would like to draw your attention to a matter of utmost importance for the wind energy sector in Greece. Specifically, it concerns the draft Special Spatial Framework for Renewable Energy Sources (RES), which has been presented by the Greek Government and is currently under public consultation until 24 June 2026[1].

The extent of the a priori exclusion zones for new wind farms introduced by the draft framework will decisively shape the future and competitiveness of the wind energy sector in Greece for the next decade. These excessive and horizontal restrictions result in an a priori exclusion zone

[1] https://ypen.gov.gr/dimosia-diavoulefsi-epi-a-tou-eidikou-chorotaxikou-plaisiou-gia-tis-ananeosimes-piges-energeias-kai-v-tis-stratigikis-meletis-perivallontikon-epiptoseon-sbe-aftou/

covering more than 61% of the country's terrestrial area. Consequently, it is inevitable that highly suitable projects will be rejected without any individual assessment, despite the fact that many of them would likely have been approved had they undergone the appropriate permitting and environmental evaluation procedures.

Beyond these adverse consequences, we believe that the proposed Special Spatial Framework for Renewable Energy Sources raises serious concerns regarding its compatibility with key provisions of European Union legislation, including Article 16f of the Renewable Energy Directive (RED III).

Naturally, we are already in contact with the Greek authorities and will actively participate in the ongoing public consultation process. However, given the significance of this issue, we respectfully believe that it also merits your attention.

We have attached a briefing note providing further details and remain at your disposal for any clarification or additional information you may require.

Yours sincerely,

Panagiotis Ladakakos

President HWEA

Attachment:

Briefing Note on the Draft Special Spatial Framework for RES in Greece

Briefing Note on the

DRAFT SPECIAL SPATIAL FRAMEWORK FOR RENEWABLES IN GREECE

June 2026

New exclusion zones against wind energy

The amplitude of a priori exclusion zones for new wind farms contained in it will decisively determine the future and competitiveness of the wind energy sector for the next decade. Amongst the most problematic restrictions appear to be those establishing the following areas as a priori exclusion zones:

- **Areas of an altitude above 1,200 meters** (Article 5, para. 1.9 of the proposed Framework).

  The Strategic Environmental Assessment (SEA) accompanying the Special Spatial Framework for RES does not explain or substantiate why it should be categorically assumed that no area above 1,200 m altitude can be spatially and environmentally suitable for the development of a new wind farm. In fact, the opposite is true: there are undoubtedly areas above 1,200 m with excellent wind resources that are fully suitable, from both a spatial planning and environmental perspective, for hosting wind energy projects.

- **Islands with an area of less than 300 sq. km** (Article 5, para. 1.10).

  If the restrictions imposed by Special Spatial Framework for Tourism are also considered, then, out of Greece's thousands of islands, islets and rocky islets, only 11 islands (plus Crete and Euboea) remain, where new wind farms may be examined. This is yet another arbitrary threshold for which neither the Ministry of Environment and Energy nor the SEA provides any explanation or justification as to why the installation of wind energy facilities should be prohibited on all islands smaller than 300 km², regardless of their size.

- **Special Protection Areas (SPAs, Article 5 par. 1.5).**

  A horizontal designation of all SPAs indiscriminately as exclusion areas is introduced. The envisaged exception in relation to wind potential is of no practical significance, as the overwhelming majority of Special Ecological Assessments (SESs) do not allow new wind farms in SPAs. This designation is unexplained. Nowhere in the SEA or the Appropriate Assessment are there data substantiating, or even explaining, this choice.

  After years of experience from the operation of wind farms in protected areas, in Greece and the rest of Europe, it has been shown that the consequences for birds — and for

biodiversity in general — cannot support the definition of so extensive a-priori exclusion zones which prohibit the case-by-case judgement based on actual data[2].

It is characteristic that the Appropriate Assessment accompanying the Strategic Environmental Assessment (SEA) emphasizes the importance of bird detection and turbine shutdown systems and states: "*This measure is expected to result in* ***negligible residual impacts on the population decline of protected raptor species, even in areas of high sensitivity*** *according to the relevant scientific sensitivity maps, as well as on* ***migratory birds****." (Appropriate Assessment, p. 201)*

- Areas designated as exclusion zones by the approved **Special Environmental Studies (SESs)**.

  These concern most of Natura areas, including SPAs (Article 5, para. 1.6 and para. 2). The upgrade of approved SESs into regulatory documents before the issuance of the relevant Presidential Decrees is contrary to the national legislation and will ultimately be detrimental to nature protection. Such an approach will cause serious legal confusion and significant problems in the implementation of the framework. The Presidential Decrees and the Management Plans – which have not been approved yet - are the institutional/regulatory documents that determine, in a binding and clear manner, the protection terms and land uses — not the SES[3].

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[2] Indicatively:

- The collision risk of migrating birds at wind turbine, BioConsult SH, 2025, https://bwo-offshorewind.de/wp-content/uploads/2026/01/The-collision-risk-of-migrating-birds-at-wind-farms.pdf
- Turbine Shutdown Systems Review for Birds at Wind Farms: a Review and Application at St. Nikola Wind Farm, Kaliakra, Bulgaria, January 2018, Natural Research Ltd., D. Philip Whitfield, https://ask4wind.gr/wp-content/uploads/2024/06/AP-23-1-Turbine-Shutdown-Systems-Review-for-Birds-at-Wind-Farms.pdf
- State of the world's raptors: Distributions, threats, and conservation recommendations, Christopher J.W. McClure, James R.S. Westrip, Jeff A. Johnson, Sarah E. Schulwitz, Munir Z. Virani, Robert Davies, Andrew Symes, Hannah Wheatley, Russell Thorstrom, Arjun Amar, Ralph Buij, Victoria R. Jones, Nick P. Williams, Evan R. Buechley, Stuart H.M. Butchart, Biological Conservation 227 (2018) 390–402, https://ask4wind.gr/wp-content/uploads/2020/06/93.-State-of-the-worlds-raptors-Distributions-threats-and-conservation-recommendations-Christopher-J.W.-McClure-James-26D.pdf
- Telemetry Project Red Kite – LIFE EUROKITE, https://www.life-eurokite.eu/de/publikationen/red-kite-telemetry-project.html & Παρουσίαση poster "First results of the LIFE EUROKITE project: Human-caused mortality of the red kite in Europe assisted by high-resolution GPS telemetry tracking. Rainer Raab et al., 7th Conference on Wind energy and Wildlife impacts 2023 (CWW2023)"
- O'Donoghue, B.G., Casey, M.J., Malone, E., Carey, J.G.J, Clarke, D. & Conroy, K. (2020) Recording and Addressing Persecution and Threats to Our Raptors (RAPTOR): a review of incidents 2007–2019. Irish Wildlife Manuals, No. 126. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland, https://ask4wind.gr/wp-content/uploads/2024/06/AP-23-7b_Ireland_2017-2019_raptors_threats.pdf
- Myths and Facts, Ask4wind initiative, HWEA https://ask4wind.gr/cons-myth05/

[3] See also the same for the Spatial Planning Framework for Tourism: https://eletaen.gr/wp-content/uploads/2026/05/2026-5-25-epistoli-ypen-exp-tourismou.pdf

- **The entire area of Municipal Units where the weighted-average wind potential across their entire territory is below 4 m/sec** (Article 4, para. 3.1).

  In other words, even if there is an area with rich wind potential that meets the remaining spatial-planning criteria, the possibility of installing a wind farm there will still be prohibited from being examined because the wind potential is much lower in the other areas of the same Municipal Unit.

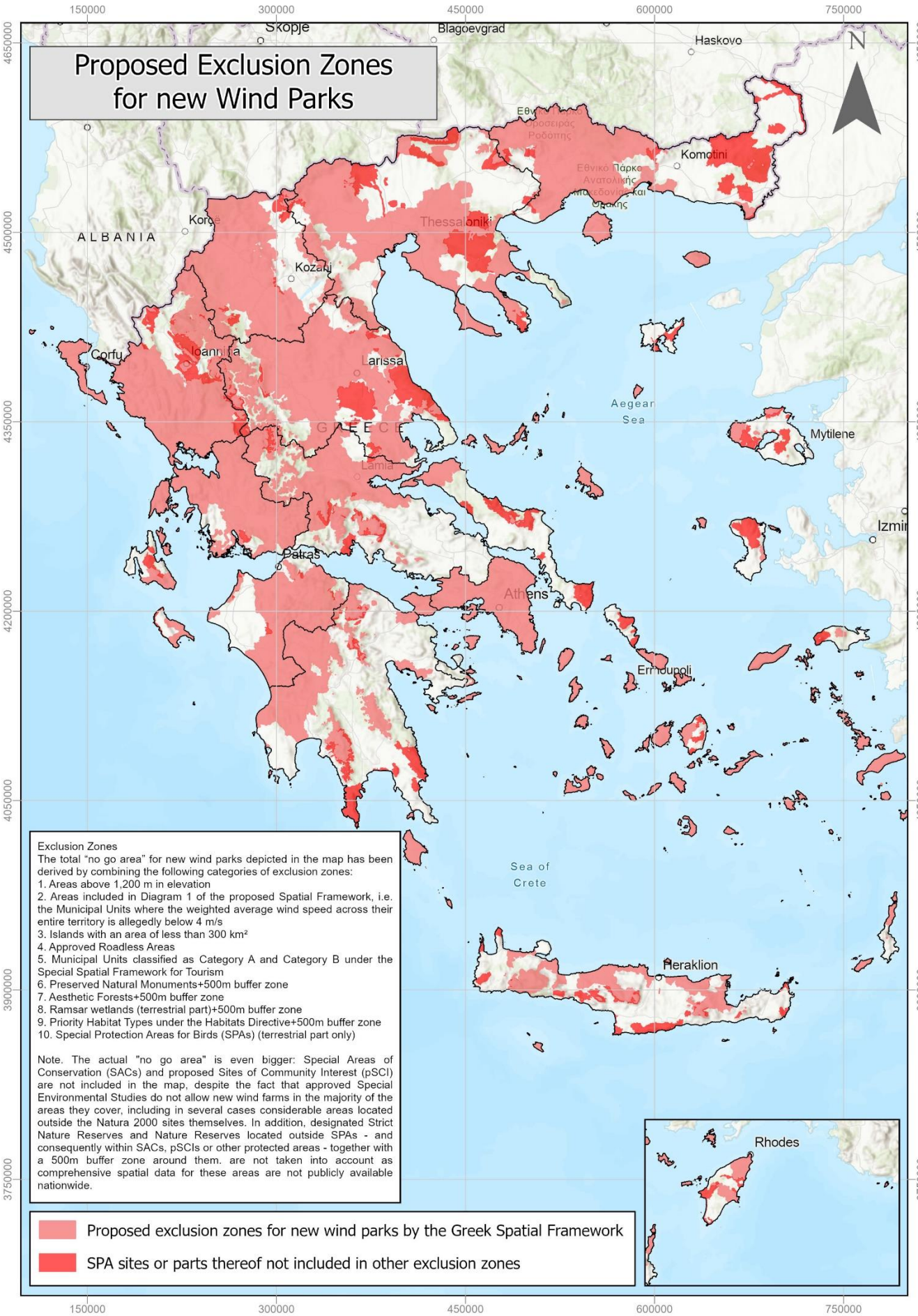
The abovementioned excessive and horizontal restrictions, together with others mentioned in the Special Spatial Framework for RES (e.g. Ramsar wetlands, priority habitats inside Natura 2000 sites, aesthetic forests, etc.), result in **an a-priori exclusion zone covering more than 61% of Greece's terrestrial area**. It is therefore certain that excellent projects will be cancelled without assessment, which, if assessed, would have been approved.

All the a-priori exclusion zones are depicted in the following map[4].

Furthermore, it should be stressed that the remaining 39% is not a free zone for wind energy. On the contrary, there are various other restrictions that may prevent the development of a wind farm: proximity to archaeological sites, Civil Aviation Authority regulations, interference with military infrastructure, proximity to settlements or tourist areas, etc.

Finally, the extensive exclusion zone described above may create doubts for the **repowering** of operating wind farms. Although, we feel that this is not the intention of the draft Spatial Framework, we need more clear expressions that these projects are not subject to the new Special Spatial Framework for RES but rather remain governed by the provisions of the existing legislation currently in force.

[4] It should be noted that the relevant map in the published draft Spatial Framework depicts only part of the exclusion zones, which distorts the real magnitude of the total no-go area for wind energy.


Proposed Exclusion Zones
for new Wind Parks
N
Skopje
Blagoevgrad
Haskovo
Komotini
Thessaloniki
Kozani
ALBANIA
Corfu
Ioannina
Larissa
GREECE
Lamia
Aegean
Sea
Mytilene
Izmir
Patras
Athens
Ermoupoli
Sea of
Crete
Heraklion
Rhodes
150000
300000
450000
600000
750000
4650000
4500000
4350000
4200000
4050000
3900000
3750000
Exclusion Zones
The total "no go area" for new wind parks depicted in the map has been derived by combining the following categories of exclusion zones:
1. Areas above 1,200 m in elevation
2. Areas included in Diagram 1 of the proposed Spatial Framework, i.e. the Municipal Units where the weighted average wind speed across their entire territory is allegedly below 4 m/s
3. Islands with an area of less than 300 km²
4. Approved Roadless Areas
5. Municipal Units classified as Category A and Category B under the Special Spatial Framework for Tourism
6. Preserved Natural Monuments+500m buffer zone
7. Aesthetic Forests+500m buffer zone
8. Ramsar wetlands (terrestrial part)+500m buffer zone
9. Priority Habitat Types under the Habitats Directive+500m buffer zone
10. Special Protection Areas for Birds (SPAs) (terrestrial part only)
Note. The actual "no go area" is even bigger: Special Areas of Conservation (SACs) and proposed Sites of Community Interest (pSCI) are not included in the map, despite the fact that approved Special Environmental Studies do not allow new wind farms in the majority of the areas they cover, including in several cases considerable areas located outside the Natura 2000 sites themselves. In addition, designated Strict Nature Reserves and Nature Reserves located outside SPAs - and consequently within SACs, pSCIs or other protected areas - together with a 500m buffer zone around them. are not taken into account as comprehensive spatial data for these areas are not publicly available nationwide.
Proposed exclusion zones for new wind parks by the Greek Spatial Framework
SPA sites or parts thereof not included in other exclusion zones

The violation of European legislation

Balancing and impact assessment | RES as projects of overriding public interest

The process of assessing environmental impacts of a wind farm and establishing protection for nature, is objectively impossible to be served through the blind approach of extensive exclusion zones. Balancing, or otherwise the case-by-case appraisal of the cost-benefit relationship is mandatory. This balance must consider the benefits offered by wind energy and by each specific proposed project.

For example, a wind farm with excellent energy productivity due to high wind potential may be assessed to proceed even in an area of high protection, because its implementation will reduce energy cost and lead to the achievement of energy and climate targets with fewer wind turbines overall. Conversely, if in another area, of the same value and protection, the wind potential is not so good, the balancing may conclude that the wind farm should not proceed or should proceed with a different design.

I] The substantive prohibition of this balancing, through the establishment of exclusion zones by means of the Special Spatial Framework for RES or the SESs, is contrary to the European RED III Directive.

According to Article 16f of the Directive:

> *"By 21 February 2024, until climate neutrality is achieved, Member States shall ensure that, in the permit-granting procedure, the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC and Article 9(1), point (a), of Directive 2009/147/EC. Member States may, in duly justified and specific circumstances, restrict the application of this Article to certain parts of their territory, to certain types of technology or to projects with certain technical characteristics in accordance with the priorities set out in their integrated national energy and climate plans submitted pursuant to Articles 3 and 14 of Regulation (EU) 2018/1999. Member States shall inform the Commission of such restrictions, together with the reasons therefor".*

However, by establishing horizontal exclusion zones on the basis of certain general characteristics of an area (e.g. that it is an SPA, or that it is located above a certain altitude, or that it is an island), and especially when that area belongs to the Natura network, Greece precludes examination of the application of Article 6(4) of the Habitats Directive in the light of **Article 16f of the RED III Directive**.

In other words, by establishing an exclusion zone, Greece is doing — among other things — exactly what the penultimate sentence of Article 16f of the RED III Directive describes: it restricts the application of that Article to certain parts of its territory, to certain types of technology or to projects with certain technical characteristics. This, however, cannot be done without due reasoning and substantiation of the special circumstances, communicated to the European

Commission. **Greece must examine the special circumstances of each specific area or sub-area and, on that basis, substantiate, if it so decides, why in that specific area certain types of technology or projects should be excluded from the provisions of Article 16f of the RED III Directive**. It is more than obvious that this cannot be done through the Special Spatial Framework for RES or its supporting study or another general study such as an SES.

We also recall that, on the basis of par. 7 of Article 4 of Law 4951/2022, RES projects are characterized as public-utility projects serving, among other things, public safety and health and having positive effects of primary importance for the environment, irrespective of the entity implementing them. This provision of national legislation must of course be read in conjunction with, and in the light of, Article 16f of the RED III Directive. This combined reading was applied by the Council of State in its important Judgments 34 and 35/2026, and in particular in paragraph 5 thereof.

II] To assess how legislation understands the manner of application throughout a whole territory (and not only in Natura areas) of the concept that RES projects are presumed as being of overriding public interest, we may also recall par. 2 of Article 3 of Regulation (EU) 2022/2577, as amended and extended until 30 June 2025. Specifically:

> *"Member States shall ensure, at least for projects which are recognised as being of overriding public interest, that in the planning and permit-granting process, the construction and operation of plants and installations for the production of energy from renewable sources and the related grid infrastructure development are given priority when balancing legal interests in the individual case.*
>
> *Concerning species protection, the preceding sentence first subparagraph shall only apply if and to the extent that appropriate species conservation measures contributing to the maintenance or restoration of the populations of the species at a favourable conservation status are undertaken and sufficient financial resources as well as areas are made available for that purpose"*

In other words, the application of Article 16f of the RED III Directive includes the balancing of benefits against impacts on other legally protected interests, which must be carried out on a specific case-by-case basis. If the other legally protected interest concerns species protection, measures must be taken to maintain or restore the populations of the species. All of these are directly violated by the unsubstantiated, horizontal establishment of exclusion zones.

The transitional provisions

The draft Framework submitted for public consultation provides that it will not apply to projects that already hold an Environmental Terms Approval Decision (AEPO) or that had submitted a complete AEPO application dossier by 20 May 2026. **This transitional provision is not sufficient**:

1] First, the date of 20 May 2026 is arbitrary. It is simply the date on which the public consultation was launched. The obvious and reasonable approach would be for the effective date of any transitional provision to coincide with the date on which the new Spatial Framework enters into force.

2] Even under such an approach, however, the transitional provision would require substantial improvements in order to cover a much larger number of projects that are at an advanced stage of development (e.g. projects that have completed long-term wind measurements, whose technical and financial viability has already been assessed by RAE, that have completed or are preparing Appropriate Assessments, etc.).

Furthermore, according to press report the Ministry calculates that the transitional provision as presented would cover 16 GW of wind projects. Of this capacity, more than 6.5 GW is already operational or under construction. Consequently, the transitional provision would effectively cover less than 10 GW of wind projects that are still under development and either already hold an Environmental Terms Approval (ETA) or are currently undergoing environmental permitting.

However, it must be emphasized that the Spatial Planning Framework is not the only regulatory instrument governing project permitting. On the contrary, there are numerous other constraints that may ultimately prevent the development of a wind farm, including proximity to archaeological sites, Civil Aviation Authority restrictions, interference with military infrastructure, proximity to settlements or tourist areas, and many others. As a result, **only a small fraction of the projects currently under development will eventually be implemented**.

Moreover, the overwhelming majority of ETAs are currently undergoing amendment procedures. This is because the overall permitting process leading to the issuance of an ETA takes many years. Consequently, when ETAs are finally issued, they reflect outdated project designs based on older wind turbine models. Investors therefore seek amendments proposing fewer but more productive and technologically advanced turbines.

Greek authorities (particularly those not directly supervised by the Ministry of Energy) frequently assess such amendments as if they were entirely new applications. As a result, **many amendment requests are unlawfully rejected, even though the proposed amendment leads to less environmental impacts vs the design which already possesses a valid ETA**.

Evidence of these distorted administrative practices can be found in the recent low participation of wind energy projects in the RAE tender under the Apollo Programme.

The conclusion from all the above is that **the volume of projects effectively protected by the transitional provision (less than 10 GW) is very limited and in no way corresponds to the targets set out in the National Energy and Climate Plan (NECP)**. According to the latest NECP, the targets for wind energy by 2050 are 24,8GW (= 13GW onshore + 11,8GW offshore).