

Newsletter



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Ministerial Decision 144622/9465 on modifications to RES Projects and Standalone Energy Storage Stations

A new Ministerial Decision of the Ministry of Environment and Energy regulates what applies in cases of modernization, expansion, improvement, or modification of already environmentally permitted Renewable Energy Sources (RES) projects and Standalone Energy Storage Stations.



Purpose and legal framework

The new Ministerial Decision of the Ministry of Environment and Energy with number 144622/9465 (the “Decision”), published in Government Gazette B’ 7065/29.12.2025 aims to establish criteria based on which the substantial or non-substantial character of a change in environmental impacts is assessed in cases of modernization, expansion, improvement, or modification of environmentally permitted RES projects and Standalone Energy Storage Stations of Group 10 of Ministerial Decision 17185/1069/21-2-2022 (Governmental Gazzete B’ 841), pursuant to the last sentence of paragraph 2 of Article 6 of Law 4014/2011 (Governmental Gazzete A’ 209), taking into account the point with number 24 of Annex I and point 13 of Annex II of Directive 2011/92.

Evaluation criteria

The criteria for evaluating whether the change in environmental impacts to occur in the event of a modification of an environmentally permitted project or activity is substantial or not are set out in the Annex of the Decision. When a modification meets the general and specific criteria applicable to it, the change in environmental impacts it causes is deemed non-substantial,



except in those cases where the competent environmental authority, with specific reasoning based on objective evidence, determines that, despite the fulfilment of the criteria, the change in environmental impacts will be substantial. The criteria established by the Decision are applied during the assessment carried out by the competent authority, in accordance with point (b) of paragraph 2 of Article 6 of Law 4014/2011 (Governmental Gazzete A' 209).

Procedural changes

Procedural changes that require an amendment to the Approval Decision of Environmental Terms (AEPO), such as adapting it to the applicable regulatory framework, incorporating permits into the AEPO, as well as amending, adding, or eliminating environmental terms where this arises from new scientific and technical developments in the field of environmental protection and management, project operation, and advancements in anti-pollution technology, are considered non-substantial changes.

Cumulative assessment of previous amendments

In cases where other amendments have preceded, the competent environmental authority, in order to assess whether the amendment is substantial or not, takes into account all previous amendments, and in particular the environmental terms as they have been shaped following the most recent amendment.

Application – AEPO amendment file

The AEPO amendment file must include documentation regarding the fulfilment of the criteria. An AEPO amendment request pending at the time of publication of the Decision is concluded by applying the provisions of the Decision, unless the project or activity owner requests its assessment based on the previously applicable framework.



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